Nō te rere moana Aotearoa
MARITIME NEW ZEALAND

Summary of submissions and submission analysis:

Design, Construction, and Equipment Rules Reform

Package 1 consultation:

- **Fire Protection**
- **Machinery & Ancillary Equipment**
- **Life-saving Appliances**
- **Anchors & Cables**

MARCH 2026

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Contents

About this document

1. Maritime NZ is undertaking a multi-year project to reform the Design, Construction and Equipment (DCE) rules. The purpose of this rules reform is to remove duplication and inconsistencies in the rules where there is no clear reason why, provide for greater flexibility to accommodate emerging technologies, and ensure maritime safety is maintained or enhanced.
2. The project to reform the DCE rules has been underway for some years. Stakeholders who have engaged with the reform have asked Maritime NZ what submitters have said in public consultations about the rules and how Maritime NZ intends to respond.
3. Maritime NZ acknowledges stakeholders' interest in what will happen with their submissions. Normally a summary of submissions is published at the end of the law-making process. However, in this case the scale and duration of the project means there will be a long gap between the first public consultation and the date when the new Rule Parts and Maritime Transport Instruments (MTIs) become law.

This document is not a consultation document

4. This document is not part of the DCE rules public consultation process. Stakeholders have had the opportunity to provide input, and consultation on the topics in Package 1 closed on 18 October 2024.
5. This document sets out the current thinking by Maritime NZ. However, feedback from future consultations may raise matters that lead to changes to the Package 1 draft Rule Parts and MTIs. Final decisions on rules will be made by the Minister at the end of the project, once consultation on all draft rules and MTIs has been completed.

How this document is structured

6. The Summary of Submissions and Submission Analysis on the Package 1 Consultation comprises a significant volume of material, structured under the headings below.

Background

7. This section provides a brief overview of the DCE rules reform project.

Significant topics and summary of themes and summary of how Maritime NZ will respond

8. This section provides a summary of the common themes made in submissions. It may be helpful for readers who have limited time.
9. Key themes and summaries are provided by Rule Part topic, including the actions Maritime NZ intends to take in response to the submissions. Each issue that requires a response is briefly described.

Detailed submissions tables and proposed responses are attached in the appendices

10. This section contains all the submissions on Package 1, arranged in tables by topic and sub-topic. The main policy proposals under each topic heading are briefly summarised

11. The tables include comments from Maritime NZ about the topics or aspects of a submission. These are intended to be informative.

12. In some cases, Maritime NZ has indicated how we will respond to a point made in a submission. The responses will inform drafting instructions used to make changes to the draft Rule Parts and MTIs. Once completed, the draft Rule Parts will be prepared for approval by the responsible Minister (most likely the Associate Minister of Transport), and the draft MTIs will be prepared for approval by the Director of Maritime NZ.

About the submissions

13. Submitters have not been identified. However, submissions with text that includes "we" are generally from a sector group.

Written submissions

14. The following sector groups made written submissions:

- Federation of Commercial Fishermen
- Leigh Commercial Fishing Association
- Marine Transport Association
- NZ Recognised Marine Surveyors

15. Some submissions included statements from members, which have been included in the tables.

16. Eleven people made individual written submissions. The submitters were operators, surveyors and suppliers / service providers.

17. The content of written submissions has been divided and allocated to the different topics. In a few cases an extract appears in more than place where a sentence in the submission addresses more than one topic.

18. The text in the tables is a copy of what submitters wrote. Care has been taken not to change the meaning of the submissions, but in some cases explanatory context has been added [in brackets], some spelling has been corrected, and some punctuation has been added.

19. Some submitters used the Maritime NZ submission templates and simply noted "agree" or ticked a box in the submission form. These are recorded in the tables as "support".

Oral submissions

20. Seven individuals including maritime operators, service providers and organisations with an interest attended online sessions. Maritime NZ also met with representatives

of Government agencies that operate commercial fleets - Customs, Department of Conservation, Ministry for Primary Industries, and Police. NIWA also attended the session for Government agencies.

21. Comments provided during meetings and online sessions were recorded as notes and then summarised in the tables of submissions.

Background

22. The reform of the DCE rules is a large, multi-year project addressing 15 existing Rule Parts. Changes to the rules are being consulted on as packages, each including four proposed new Rule Parts and the associated maritime transport instruments (MTIs). The proposed new Rule Parts and MTIs will come into force at the same time, after all changes have been consulted on.
23. In August 2024 the first package of draft Rule Parts and MTIs (Package 1) was released for public consultation. The topics were Fire Protection, Machinery & Ancillary Equipment, Life-saving Appliances, and Anchors & Cables.
24. In May 2025 Package 2 consulted on proposed new Rule Parts and MTIs for Stability, Drainage, Freeboard and Subdivision; Watertight and Weathertight; Electrical; and Radio Equipment.
25. We expect to consult on Package 3 in 2026, addressing Accommodation, Access, Escape, and Personal Safety; Lifting Appliances; Navigation Equipment; and Survey and Certification. Package 4 will follow and address consequential amendments to Part 404 Cape Town Vessels; revisions to the convention Rule Parts – SOLAS, Tonnage, and Load Line; and rules for non-conventional vessels not covered by other Rule Parts (for example houseboats).
26. More information about the reform of the DCE rules can be found at https://www.maritimenz.govt.nz/rules/40-series-reform-project/

What we heard - Significant topics and summary of themes in Package 1 and the proposed response

27. Themes and key points from submissions on the Package 1 public consultation are summarised below. The key themes do not cover every point raised through submissions and online sessions. However, these details are included in the table of submissions at the end of this document and will be incorporated, where appropriate, into the final drafts of the Rule Parts and MTIs.
28. The tables below summarise how Maritime NZ intends to respond to the themes raised in submissions, recognising that final decisions rest with the responsible Minister for the Rules and the Director for MTIs. Each main topic has a separate table. Each table is preceded with a summary of the key themes raised in the submissions.

General concerns and response

Topic	Response
Many submitters supported the proposed changes, or did not expressly oppose them, but were concerned that proposed rule changes will add costs for existing operators.	Maritime NZ is carefully considering costs and benefits and is revising proposals that could unnecessarily increase costs where costs outweigh benefits. Proposals that will be revised are discussed under the topic headings below.
Some submitters were concerned that transition time frames could be too short where changes would apply to existing vessels.	Maritime NZ is reviewing and aligning the transition timeframes for all proposals. These will be consulted on as part of the public consultation on the Survey and Certification Rules, expected to be by mid-2026.
Submitters wanted to know what rules will apply if a vessel has a major alteration or changes its scope of certification; or is purchased in Australia (second-hand) for commercial use in New Zealand.	Maritime NZ is reviewing the definition and application of **major alteration** and **major change to a ship's operation**. Maritime NZ will consult on these definitions as part of the public consultation on the Survey and Certification Rules, expected to be by mid-2026.
Some submitters were concerned that navigating the new rule DCE set is difficult, because requirements will be arranged by topic, split between Rules and MTIs, and numbered in a different way.	Maritime NZ will: - Re-order the new Rule Parts to reflect the order in which topics are arranged in Parts 40A, 40C and 40D. - Provide consolidated versions of the new rules and MTIs. These will include cross references and commentary to make it easier for users to understand and navigate the requirements. - Provide training on using the new rules and MTIs.
The proposed rule changes would mean that restricted coastal limits would no longer be	Guidance on the removal of restricted coastal limits as a threshold for determining requirements will be provided as part of implementation of the new rules. The

Topic	Response
used as a category to determine what life-saving appliance requirements would apply.	guidance will explain that vessels operating within coastal limits would be required to comply with the requirements specified for a vessel operating within the coastal limit. Or if operating within 12 NM, the requirements specified for vessels operating within inshore limit (b)[1] – that is, as defined in paragraph (b) of the inshore limits definition in Part 20: Operating Limits.
Some submitters thought that New Zealand Maritime Rules should align with the Australian National Standard for Commercial Vessels (NSCV) or that New Zealand should adopt the NSCV.	The draft new rules align with the NSCV where practicable. However, the NSCV has not been adopted in full. The NSCV sets requirements based on Australian operating limits. These do not include and are different to New Zealand operating limits, so the NSCV cannot be directly applied. Some standards in the NSCV are higher than the draft rules propose and would be difficult to justify based on costs versus benefits. Other parts of the NSCV have gaps; or set standards that are lower than necessary to address safety; or are overly detailed. New Zealanders would have no say in future changes to the NSCV that could have a significant impact on the New Zealand commercial fleet.
One sector group thought that rules are unnecessary because operators should be able to manage risks themselves, or as part of their obligations under the Health and Safety at Work Act 2015.	Maritime NZ believes that Maritime Rules are necessary. It would be expensive and inefficient for every operator to have to work out for themselves the appropriate design, construction, and equipment standards for each aspect of their vessel. The results would be inconsistent and could result in harm to the individual operator; other people on their vessel; and other vessels in the vicinity. The operating context would be

[1] inshore limits means —

(a) the inshore limits set out in Part 2 of Appendix 1; and

(b) in relation to a ship, any defined section of the coastal limits not beyond the limit of the territorial sea of New Zealand (which has been assigned to that ship as an inshore limit by a surveyor under rule 20.20(1)),subject to rule 20.20(4):

Topic	Response
	ambiguous particularly for small operators, who would not know with confidence if they had met requirements or not. Setting standards in rules is normal in New Zealand where safety is important. For example, rules apply to the other modes of transport (air, road, and rail), and the Building Code sets standards for buildings. All other jurisdictions that are comparable to New Zealand (including Australia, the United Kingdom, Canada and the European Union) set design, construction, and equipment rules for ships. However, as noted above, Maritime NZ will be reviewing draft rules where safety benefits are not clear or proportionate to the risks of harm.

Key themes: Fire Protection Rules

29. Feedback on the proposals was mixed. Much of the feedback generally supported the proposals or partially supported the proposals with helpful comment on specific technical details. Some submitters wanted the rules to allow more flexibility or more discretion for surveyors.
30. Some submitters thought that the new fire protection requirements should not apply to **existing vessels** – that is, that 'grandparenting' should apply. Other submitters thought that longer transition timeframes should apply.
31. One submitter opposed the whole approach to **fire risk classification** arguing that there is no historical evidence to support it. They also suggested that all inshore fishing vessels should be treated as low risk.
32. The proposals for **fire detection and alarm systems** were broadly supported. One submitter was concerned that stand-alone heat/smoke detectors could disrupt sleep due to false alarms.
33. Submitters gave conditional support for proposals for **fixed fire extinguishing (FFE) systems.** They noted the difficulty of making an existing engine room sufficiently gas-tight to allow a FFE system to work properly and were concerned that the proposed two-year transition time would be insufficient. Two submitters noted potential health risks if crew are exposed to the chemicals used in FFE systems.
34. Submitters broadly supported the proposed **structural fire protection (SFP)** requirements for new vessels. Some submitters made helpful suggestions to clarify some technical aspects – for example stairways and thresholds for electrical energy storge systems. However, submitters were concerned about the cost and practicality of **applying SFP requirements to existing vessels**, and the **proposed five-year transition period**.
35. There was mixed support for proposals to consolidate and harmonise requirements to carry **firefighter's outfits and self-contained breathing apparatus**. Support was also mixed for a new proposal that vessels of 24 metres or more would need to carry a minimum of two **emergency escape breathing devices** in machinery spaces.
36. Submitters generally supported proposals to reduce and simplify requirements to carry **fire hose appliances** (pumps; hydrants; mains; hoses); and to require **gas fitting work and LPG installations** to be carried out by a registered and licensed gasfitter.

Response to submissions on draft Fire Protection Rules and MTI

Topic	Issue	Response
Fire Protection Definitions	"Berthed passenger" is not defined.	Maritime NZ will provide guidance on 'berthed passenger' as part of the implementation of the rules.
	Application of the term "internal spaces" is not clear.	Maritime NZ will add a definition of 'internal space'.
Fire detection and alarm systems	The draft Rules would require all Medium and High fire risk vessels to have a fixed fire detection and alarm system, which could include some vessels of less than 15m depending on their fire risk rating.	Maritime NZ will review the draft requirements to have fixed fire detection systems on vessels of less than 15 metres in length and existing vessels.
	Submitters noted that installing fire detection and alarm systems involves significant work on the vessel and takes a vessel out of service for a prolonged period, with corresponding lost revenue. They suggested a transition period of 3 years or next renewal survey, whichever is the greater.	Maritime NZ is reviewing and aligning the transition timeframes for all proposals and will consult on this as part of the public consultation on the Survey and Certification Rules. The transition timeframe to install a fixed fire detection and alarm system will be included as part of this work.
Fixed fire extinguishing (FFE) system	Concern that crew could be exposed to toxic smoke in the place where they activate the FFE system.	Maritime NZ will clarify the Rules to ensure that the means to activate the FFE system is in a safe position on the vessel.
	Suggestion that the instruction manual covering the operation and maintenance requirements for the FFE system (MTI 8.2(8)) should be allowed to be carried digitally.	Maritime NZ will revise MTI 8.2(8) to include digital information.

Topic	Issue	Response
Structural fire protection (SFP) on new vessels	[In regard to] Electrical Energy Storage (EES) systems, structural fire protection (SFP) should be based on EES capacity not propulsive power. EES SFP should be linked to operating limit and time/range to rescue. Length of vessel has little relevance to EES fire protection needs.	Maritime NZ will revise the structural fire protection (SFP) provisions where vessels are powered by electrical energy storage systems, to set requirements based on battery / EES capacity rather than propulsion power. The approach to SFP for EES outlined in the recent consultation on the Fire Protection chapter (C4) of Australia's NSCV will be considered as part of this work. Maritime NZ will ensure that any changes to the Fire Protection rules align with the settings proposed for the rules for Life Saving Appliances, Access, Escape, and Personal Safety. These three sets of requirements must work together as they are designed to collectively ensure survival in an emergency. For example, a liferaft may provide a means to remain safe if the fire protection systems on a vessel are overwhelmed in a fire.

Topic	Issue	Response
Structural fire protection (SFP) on existing vessels of 24 metres or more in length	Submitters pointed out that retrofitting structural fire protection to an existing vessel would be costly and practically challenging to do.	Maritime NZ is reviewing and aligning the transition timeframes for all proposals. This work will include timeframes to fit structural fire protection to an existing high fire risk vessel of 24 metres or more in length. Considerations will include whether 10 years would be more practicable, and whether a fire detection and alarm system and a fixed fire extinguishing system would be an effective mitigation for an existing vessel of 24 metres or more that lacks SFP. Considerations will also include ensuring appropriate life-saving appliances are available if SFP requirements are reduced for an existing vessel of 24 metres or more.
	Section 3 Structural Fire Protection lacks clarity regarding internal stairways.	Maritime NZ will revise the proposed SFP requirements in MTI clause 3.2(4) applying to internal stairways so that existing vessels are not required to comply (i.e. grandparenting would apply).

Topic	Issue	Response
Firefighter's outfits and self-contained breathing apparatus	The proposals would reduce requirements for many operators but would increase requirements for around 50 non-passenger vessels of 24 metres or more in length. This was opposed by several submitters.	Maritime NZ will reconsider the proposals for firefighter's outfits and self-contained breathing apparatus, including whether the proposed inshore threshold for non-passenger vessels should move to coastal, and whether requirements should more closely align with the Australian National Standard for Commercial Vessels (NSCV). Considerations will also include ensuring appropriate life-saving appliances are available if these requirements are reduced.
Fire Control Plans	A fire control plan would be required for High fire-risk vessels of any length; Medium fire-risk vessels of 15 metres or more; and all vessels of 24 metres or more in length. Submitters thought these thresholds "are set too high" [that is, would apply to too many vessels.]	Maritime NZ will review the proposed thresholds for Fire Control Plans and consider whether they should align with Australia, which does not require plans for smaller vessels operating close to shore. The Australian National Standard for Commercial Vessels (NSCV) requires a fire control plan if the vessel is 25m or more in length; or carries dangerous goods; or carries 37 or more day passengers in coastal and offshore limits; or carries more than 12 berthed passengers in any limits.

Key themes: Machinery and Ancillary Equipment

37. Submitters generally supported the proposals. Some submitters provided helpful comment or suggested clarifications to specific technical details - for example how to arrange **bilge alarms in fish holds** to avoid 'nuisance' alarms caused by normal ice melt.

38. Submitters supported **engine alarms** and arrangements to **remotely shut down the engine** on new vessels but generally opposed retrofitting these requirements to existing engines because they thought it was not practicable.

Response to submissions on draft Machinery and Ancillary Equipment Rules and MTI

Topic	Issue	Response
Fuel systems and fuel tanks	The Rules as drafted would require a hydrocarbon detector for diesel fuel tanks, but diesel has a high flashpoint so is not an explosion risk.	Maritime NZ will revise the draft Rules to apply to low flashpoint fuels.
	The draft Rules require integral tanks to be pressure tested but do not require testing for other tanks.	Maritime NZ will revise the draft Rules to require non-portable fuel tanks to be tested to a minimum pressure.
	The use of Bar as a measure of pressure is inconsistent with other systems.	Maritime NZ will revise the draft Rules to use kPa as a measure rather than bar.
Engine alarms and remote engine shutdown	Submitters supported these requirements for new engines but noted that it would not be practicable to retrofit to an existing engine.	Maritime NZ will include a grandparenting provision to exclude existing engines from the requirements for an engine alarm and remote shutdown.
	Suggestion to revise the engine shutdown draft by adding electrical means.	Maritime NZ will revise the drafting to include electrical means of engine shutdown.
Bilge alarms in fish holds, cargo holds and watertight compartments	This proposal was generally supported but also opposed by some submitters concerned about false alarms, particularly due to ice melt in a fish hold.	Maritime NZ will revise the proposed Rules to avoid ‘nuisance’ alarms. This could be achieved by connecting the alarm to a separate float switch that would be triggered if the water level rises higher than the upper limit of the bilge pump.

Topic	Issue	Response
Bilge drainage	The Rules need to allow for vessels that may have been approved with alternative arrangements to a conventional bilge main and manifold. [Refer rule C7.2(3)]	Maritime NZ will add provisions – aligned with the NSCV – to allow an alternative arrangement to a bilge main and manifold. Maritime NZ will add grandparenting provisions for passenger, non-passenger and fishing vessels of 24 metres or more in length that pre-date 27 May 2004; and sailing vessels that pre-date 10 April 2010.
	The Rules as drafted would not allow a bilge pump in an engine space to start automatically. [Refer rule C7.2(12)]	Maritime NZ will revise the provisions for automatic bilge pumps to allow an automatic bilge pump in an area containing contaminants if it discharges to a suitable sized bilge holding tank that is fitted with an alarm to signal when the level gets high.
Electrically powered bilge pumps	Suggestion that there should be an alarm (audio / visual) when the manual override switch has been activated to isolate the automatic function.	Maritime NZ will assess the costs and benefits of adding this requirement and add if practicable.
	The proposed Rules would require electrically powered submersible bilge pumps to have an IP67 rating, but a submitter advised that most common bilge pumps do not explicitly state the rating.	As part of implementation of the rules, Maritime NZ will work with suppliers and provide information on how to determine which electrical bilge pumps have an IP67 rating.
Plastic seawater and bilge pipe	The allowable standards for plastic pipe and the thresholds for when plastic pipe must be fire-resistant “require a lot of work”.	Maritime NZ will revise the MTI to add more structural standards that plastic pipe may be manufactured to. Maritime NZ will review the requirements for when plastic pipe would need to be fire-resistant. This will include considering what Australia requires, and whether to align requirements

Topic	Issue	Response
		with the High fire-risk thresholds proposed in the draft Fire Protection Rules.
	Plastic pipe components use 90-degree right angle bends that negatively affect the delivered volume and pressure.	Maritime NZ will review the draft MTI to require swept bends where appropriate when plastic pipe is used.

Key themes: Life-saving Appliances Rules

39. **Lifejackets.** All submitters agreed that all persons on board should have a lifejacket. Some expressed concern about servicing arrangements for lifejackets, including the frequency of servicing. There were mixed views on when the lifejacket requirements should come into effect. Some suggested they should come into effect when the rules came into effect, some thought a two-year transition period was reasonable while others suggested a longer transition period, for example, five years. One submitter suggested that lifejackets should have age limits for what can be used.
40. **Liferafts.** Some submitters strongly supported requiring liferafts in the inshore limits, while others were strongly opposed, with concerns about access to servicing and cost. One submission opposed the proposed thresholds of operating south of 44 degrees south latitude or in water temperatures under 15 degrees centigrade – but others supported these proposals. Two submitters opposed relaxing liferaft standards to allow open liferafts because they could expose occupants to the risk of hypothermia.
41. **Rescue boats**. Most submitters supported more flexible arrangements for rescue boats. Some submitters thought it would not be appropriate to allow tenders or other auxiliary craft to be used as rescue boats. Submitters opposed proposals to extend requirements for a rescue boat to inshore limits and vessels with 12 passengers or more in coastal limits.

Response to submissions on draft Life-saving Appliances (LSA) Rules and MTI

Topic	Issue	Response
Lifejackets	The proposal in relation to when buoyancy apparatus could be used instead of a lifejacket or personal floatation device (PFD)	Maritime NZ will update the draft Rules to make it clear that a lifejacket or PFD is required for all persons on board, except in

Topic	Issue	Response
	was not clear. Submitters were concerned that it would allow carley floats to be carried instead of lifejackets. This is not the case.	the limited circumstances specified in MTI 5.4(4) and (5) where a surveyor may determine that a lifejacket or PFD is not required: - In the case of MTI 5.4(4) – a wetsuit of 53 Newtons or more may be used instead of a lifejacket or PFD if it is a condition on the Certificate of Survey that it is worn at all times during the voyage; the vessel operates within enclosed water limits, inshore limits, or inshore fishing limits; the vessel only operates during daylight hours; and the surveyor is satisfied there are no other factors that would indicate the use of a wetsuit is not appropriate. - In the case of MTI 5.4(5) – a lifejacket or PFD may not be required if buoyancy apparatus is available; the vessel is operating so close to shore that in an event of an emergency a person could disembark to shore; the master and crew have lifejackets; and the average mean water temperature does not go below 15 degrees Celsius. Maritime NZ does not propose to include a rule that would require vessels to carry buoyancy apparatus, for at least 30% on board, in addition to the requirement for lifejackets for all on board.
	Submitters supported the proposal to require lifejackets to be carried for all persons on board. However, regarding the proposed timeframes submitters were concerned that: - Vessels would need to carry lifejackets for all persons on commencement of the Rules, which may be insufficient time; and	Maritime NZ is reviewing and aligning the transition timeframes for all proposals, and these will be consulted on as part of the public consultation on the Survey and Certification Rules. The transition timeframe to meet the proposed new lifejacket requirements will be included as part of this work.

Topic	Issue	Response
	- Existing lifejackets would need to meet proposed new standards in two years, which would be a significant cost and may not align with planned maintenance and replacement schedules.	
Liferafts	**Requirement to carry a liferaft** Feedback in the online sessions was critical of the complexity of the risk-based approach for determining when a liferaft is required, which respondents noted was difficult to follow. Some operators and sector groups were concerned at the level of discretion the proposals would give to surveyors due to what they experience as wide variation in the way that surveyors apply the current rules. The primary concern with the proposal was the cost of liferafts - both the purchase costs and ongoing servicing costs. Some operators of small vessels were also concerned that they would not be able to practically fit a liferaft on their vessels.	Maritime NZ will review the provisions which set out when a liferaft would be required, with a focus on: - Simplifying the risk-based approach and application of surveyor discretion. - Ensuring the requirements for vessels are set at the right level, particularly those vessels operating within enclosed water limits, inshore limits and inshore fishing limits. The proposed requirements are likely to reduce in some areas e.g. the requirement to have 200% liferaft capacity in some situations. - Ensuring that any changes to the Life-saving Appliance proposals align with the settings proposed for the rules for Fire Protection and Accommodation, Access, Escape, and Personal Safety. These three sets of requirements must work together as they are designed to collectively ensure survival in an emergency. For example, a liferaft may provide a means to remain safe if the fire protection systems on a vessel are overwhelmed in a fire. Part of this review will include considering the costs of servicing.
	Open reversible liferafts The proposal to allow open reversible liferafts within coastal limits is more permissive than current requirements.	Maritime NZ will review the proposal to allow open reversible liferafts out to coastal limits. The review will consider whether their use should be restricted to vessels operating closer to shore – for example enclosed water limits or restricted limits;

Topic	Issue	Response
	The response to the proposal was mixed. Two submitters were concerned that open liferafts are cold and would lead to hypothermia. Another submitter took the view that any liferaft would be better than none.	what capacity they would need to accommodate; and the overall costs of an open liferaft compared to an enclosed liferaft.
	Liferaft servicing The cost and logistical challenges associated with servicing liferafts have been raised by stakeholders for some years.	- Maritime NZ will consider extending the service period for non-SOLAS liferafts to align with manufacturer recommendations as long as the recommended servicing interval does not exceed 36 months. - Maritime NZ will review the draft Rules to consider whether the new rules should include a requirement that persons servicing appliances within approved facilities must be approved by the manufacturer for those specific appliances. - The review of the requirement to carry a liferaft (discussed above) will include consideration of the costs of servicing.
Rescue boats	**Requirement to carry a rescue boat** Rescue boats may cost several tens of thousands of dollars. Submitters consider proposals to require a wider range of vessels to carry a rescue boat to be unwarranted, particularly for passenger vessels operating in the inshore and coastal limits.	Further analysis is required before the Rules are finalised. Maritime NZ will review the proposed thresholds for requiring a rescue boat. In particular, the review will consider whether the proposed settings for passenger numbers and vessel length, and the operating limits within which alternatives to rescue boats can be used, are set at the right level.
	Rescue boat launching and retrieval Concerns that the Rules need to have more detail on design / construction standards for rescue boat launching equipment.	Further analysis is required before the Rules are finalised. Maritime NZ will consider whether the draft Rules for rescue boat design need to be more specific regarding: - Approval of rescue boat launching equipment.

Topic	Issue	Response
	Manual launching for rescue boats would be allowed out to the coastal limits. Submitters were concerned that manual launching and retrieval may not be appropriate in all situations / operating areas.	- Conditions that apply to manual launching and retrieval.
Lifebuoys	The proposed new Rules would reduce requirements for many vessels, but consolidating and harmonising the current rules would increase requirements for some vessels without a good policy reason for doing so. Particular concern was raised in relation to increased requirements for vessels 15 metres or more but less than 24 metres operation within enclosed water limits, inshore limits, or inshore fishing limits.	Maritime NZ proposes to retain the requirement for 4 lifebuoys to be carried on vessels that are 15 metres or more but less than 24 metres and that operate within enclosed water limits, inshore limits, or inshore fishing limits. However, we propose to extend a surveyor's discretion to reduce the number of lifebuoys required (MTI 4.6(4)) to include vessels of 15 metres or more but less than 24 metres – if certain circumstances apply.
	Suggestion to require lifebuoys to be marked. This is consistent with the requirements in the current rule. Being able to trace a lifebuoy back to its source would be valuable in some circumstances, to determine if there has been a safety related incident.	Maritime NZ will revise the draft MTI to require lifebuoys to be marked with the name of the port of registry and the vessel on which it is carried.
Line throwing appliances	Concern that the requirement to carry a line throwing appliance has increased without a good policy reason for doing so.	Maritime NZ will consider whether existing vessels should be able to comply with the current rules – that is whether grandparenting should apply. This will be included as part of consultation on the draft Survey and Certification Rules.

Key themes: Anchors & Cables Rules and MTI

42. Submitters generally supported the proposals. Some submitters provided helpful comment or suggested clarifications to specific technical details.

43. Submitters did not support the draft new Rules being based on standard stockless anchors, which they considered old-fashioned and not widely used. Suggestions for improvement included adding a pathway for non-traditional anchors based on anchor holding power rather than weight and clarifying when non-traditional anchors need to be certified.

Response to submissions on draft Anchors and Cables Rules and MTI

Topic	Issue	Response
General requirements	The general requirement that "Anchors and cables fitted to a ship must be capable of holding the ship when required." [Rule C1.1(2)] is too broad and could be read as covering all situations.	Maritime NZ will revise the draft wording of Rule C1.1(2) to link performance to the intended design.
High holding power (HHP) and super high holding power (SHHP) anchors	The draft Rules and MTI do not provide a mechanism to substitute an ordinary stockless anchor for another design based on holding power (rather than weight).	Maritime NZ will revise the draft Rules to: - Add a pathway for non-traditional anchors based on anchor holding power rather than weight. - Clarify when certification is required for non-traditional anchors.
Steel wire anchor cable	A steel wire cable should be thimbled or swaged to prevent damage and potentially breaking. At the other end a spelter socket should be used for the same reason.	Maritime NZ will revise the draft MTI clause 2.7(8) to require steel wire rope to have end termination, including thimbles swages and spelter sockets.
Certificate of test requirements	It is unlikely that information on steel wire rope will be available regarding the ore material used; the grade of zinc coating applied; the adhesion test results; or the method of the breaking load testing [refer [MTI clause 3.3(2)(j)]].	Maritime NZ will revise the draft MTI to remove zinc coating and ore details from MTI clause 3.3(2)(j), as these are not safety critical.

Appendix 1: Fire Protection Rules and Maritime Transport Instrument: Detailed submissions and proposed responses

Fire Protection Rule design and general comments

Consultation proposals:

The proposed new rules would consolidate and harmonise the fire protection rules across vessel types, where applicable.

The arrangement of rules has been standardised across the different topics.

Topic	Support / did not support	What submitters said	Maritime NZ's response
Use of 'subrules'	Comment	There is reference to subrules, yet no subrules appear to be labelled within this document. C4.2 (2) and (3) There are references to subrules in this section – refer my comments above.	**No changes are proposed.** A subrule is a part or detailed clause of a rule. This approach is widely used in legislation including the current and proposed rules. Subrules do not need to be labelled.
Definition of berthed passenger	Comment	Also clarify the interpretation of berthed passengers.	**No changes are proposed.** Providing a definition of berthed passenger has the risk of unintentionally capturing many vessels - for example passengers can sleep on seats and couches. Our research did not locate definitions in comparable jurisdictions, including nothing being included in the NSCV. As part of implementing the rules, Maritime NZ will provide guidance on 'berthed passenger'.
	Comment	Add definition of "berthed passenger" to definitions section.	
Definition of 'internal space'	Comment	Further definition/scope of the term "internal spaces" in Section 7, Clause 7 of the MTI would assist with compliance.	**Response** Maritime NZ will add a definition of 'internal space'.
Definition of length	Comment	Sections C3.2(2) to (4) are confusing. Application should be for ships measured LOA (remove LLL) as this just adds another layer of complexity.	**No changes are proposed.** Many international conventions and classification society rules use 24 metres LLL as a threshold for applying requirements. Using 24 metres LLL in domestic rules would make alignment with these rule sets more straightforward. Only a small number of vessels would be impacted, and the benefits outweigh the drawbacks of added complexity.
General provisions **General Requirements** **Responsibilities Section** **Ship requirements section**	Support	Support	**No changes are proposed.**
Flexibility	Did not support	The Maritime Transport Instrument (MTI) requires further refinement, as it is currently too restrictive and does not allow surveyors to provide flexible solutions. For instance, references to the IMO FSS-Code and other standards may not be applicable to domestic vessels operating within restricted limits.	**No changes are proposed.** Maritime NZ agrees that some flexibility within the rules is desirable. To achieve this, the draft Rules set requirements – what is required – and the MTIs set out how to meet the requirements. This arrangement has been used because MTIs can be

Topic	Support / did not support	What submitters said	Maritime NZ's response
	Did not support	Should incorporate alternate solution for very small vessels. Needs ability for AMOC [alternative means of compliance] as technology is changing fast.	more easily revised by the Director of Maritime NZ in response to sector changes and developments. The drafting of the new Rules is constrained by the empowering provisions contained in the Maritime Transport Act 1994, and the requirements set by the Ministry of Transport guidelines on the use of Maritime Transport Instruments. Within these constraints Maritime NZ has endeavoured to draft flexible rules, but this does not extend to providing surveyors with open-ended discretion to decide rules requirements.
Role of MNZ/surveyor	Did not support	Where we have indicated a discretion should exist, [we] would expect the details of what measures are appropriate should be discussed with their surveyor for inclusion in their MTOP. As noted earlier [see general section], we would prefer the MTOP is approved by an experienced, registered surveyor rather than a Maritime Officer.	**No changes are proposed.** Maritime Rules Part 19 sets the requirements for Maritime Transport Operator Plans (MTOPs). Part 19 is not currently being reviewed, and at this stage there are no plans for approval of MTOPs to be done by surveyors.
General comments	Did not support	With the low risk of fire already noted by the Transport Accident Investigation Commission, we consider it would be appropriate for all vessels to have the appropriate alarms and fire fighting equipment installed by the date of their next survey but would recommend all operators look at the provision of such equipment as a priority. We would expect that all vessels currently operating under New Zealand survey certificates would already be compliant.	**No changes are proposed.**
	Did not support	Has failed to resolve the gaps in existing rule e.g. what is a galley and what galley fitout and use presents a fire risk? Tables or lists, not dependant combination of both.	**No changes are proposed.** The draft rules include a definition of galley and the MTI defines small and large galleys based on gas/electricity consumption, with additional protection for large galleys.

Fire risk classification

Consultation proposal:

All vessels would need to be classified as 'Low fire risk', 'Medium fire risk', or 'High fire risk'.

Support / did not support	What submitters said	Maritime NZ's response
Support	This seems reasonable to me.	**No changes are proposed** The fire risk classification is based on combining the likelihood of an event and the consequences of an event. This approach is widely used across many fields to assess risk. Around 20 fires on vessels are reported annually to Maritime NZ. Most of these fires are minor but serious fires occur periodically. New Zealand has been fortunate that these fires have not resulted in loss of life. Significant fires were considered when the risk classification was being developed. For example, the PeeJay V or the Dong Won in New Zealand, the Conception fire in California and the Brim in Norway. The fire risk classification is designed to weight vessels that carry passengers. The likelihood of harm increases as passenger numbers increase. Sleeping passengers face the highest risk, which is why the highest risk weighting applies where passengers sleep on board. Operating limits are weighted, as the consequences of a fire increase as a vessel moves further from shore and assistance. Length is used as a proxy for overall risk. As vessels get larger, they carry more systems and equipment; the systems on board are typically more complex; and the fire load (the amount of material that can burn) increases. Likelihood is expressed within the rules. For example, fixed fire-extinguishing systems are linked to engine output; the highest level of structural fire protection is required around areas of major fire hazard; and independent ventilation systems are required for major fire hazard areas. Most inshore fishing vessels are less than 15 metres in length. These would be classified as low fire risk vessels.
Did not support	Why? Because of length? Why not history of owner etc?	
Did not support	We do not accept the risk classification proposed by Maritime NZ. The classes are based on the potential impact of a fire and take no account of the likelihood of a fire nor the history and experience in the database. The division into fire risk classes based on the operating limits or on the size of the vessel is baseless. The probability of or the impact of a fire is not dependent in any way on the distance from shore, nor on the length of the vessel. We reject the risk classification.	
Did not support	Low risk vessel should be defined as one where all the persons on board are trained and competent in the use of firefighting and all other equipment on board and there is no substantial adverse risk to property or the environment.	
Did not support	All commercial vessels operating within New Zealand's waters and which only have harvesting and primary processing of fish should be classified, irrespective of their size, as low risk vessels. We would exclude factory vessels with other activities such as processing and/or freezing fish from being considered as low risk. We would exclude all passenger carrying or freight carrying vessels from being low risk vessels.	
Did not support	Does only passengers count? Does length equate to risk? What does impact risk?	

Fixed fire detection and alarm systems (wired in)

Consultation proposals:

Vessels of 15 metres or more in length would require a fixed (wired in place) fire detection and alarm system. All Medium and High fire risk vessels would require a fixed fire detection and alarm system, which could include vessels of less than 15 metres if they carry 37 or more passengers or carry berthed passengers or operate in the offshore limits or the unlimited area.

Vessel would have 2 years to meet this requirement from the date that the rules come into force.

Support / did not support	What submitters said	Maritime NZ's response
Support	Early warning and alarms for fire and threat of sinking or instability are a requirement on all vessels.	**Response** Maritime New Zealand will review the draft requirements to have fixed fire detection systems on vessels of less than 15 metres and existing vessels. Considerations will include allowing standalone detectors that have a wireless connection to the sounder(s) - i.e. by wi-fi - so that a triggered alarm can be heard throughout the ship. Maritime NZ is reviewing and aligning the transition timeframes for all proposals, including the proposed 2-year transition timeframe to install a fixed fire detection and alarm system. Proposals will be consulted on as part of the public consultation on the Survey and Certification Rules, expected to be by mid-2026. **Comment** Most submitters appear to support proposals to have fire detection and alarm systems. The draft clause MTI 7.2(10)(b) requires a fixed fire alarm to be "audible and visual". Under draft rule C7.2(5) a stand-alone fire detection and alarm is not required if the vessel has a fixed system. The current draft rules would require all Medium and High fire risk vessels to have a fixed fire detection and alarm system. This could include vessels of less than 15 metres if they carry 37 or more passengers or carry berthed passengers or operate in the offshore limits or the unlimited area, which was not intended. The original policy analysis concluded that fixed systems should not be required for smaller vessels.
Support	We agree that all vessels should have early warning and alarms systems, appropriate to the size and capability of the vessel. Such alarms should be both visible and audible in the wheelhouse and any accommodation area. For vessels where a continuous power supply is available, the alarms should be connected to that power supply and be capable of automatic operation.	
Support	The addition of these systems greatly improves the early detection of a fire.	
Support	Support	
Support	Two years to implement the proposal appears reasonable.	
Support	Due to cost, it makes sense, but during the transition they must have some sort of fire detection system whether it's a watch keeper, or other electronic system in place in its stead until the system is installed, and certified	
Support	We support the approach. Earlier detection improves the chances of controlling the fire and successful damage control. We note that one of our vessels is under 15m in length but does already have a fire detection and alarm system in each engine room. In this case, we would prefer to have the option of leaving the fixed fire detection and alarm systems in place; possibly an explicit clause stating that a fixed fire detection and alarm system is an acceptable alternative to standalone smoke alarms would cover this scenario.	
Support	I've priced this in the past and it was expensive, so I chose not to do it. I see it as a positive requirement and happy to do so.	
Did not support	I do not agree with the 2-year timeline to have these installed. The installation of such a system requires in many case the removal of deckhead linings, installation of bulkhead glands for the wiring, rearranging of bridge display layout etc, all of which is time consuming and takes a vessel out of service for a prolonged period, with the corresponding lost revenue. I suggest the timing should be 3 years or next renewal survey, whichever is the greater.	
Did not support	Overkill, boat isn't big enough where you can't smell smoke.	
Comment	[Operator] does not have a fixed fire-extinguishing system in the engine room of their larges[t] vessel (the ---- 18 metres). However, they do have a camera in the engine room, so if there is a smoke smell they check the camera.	

Fire detection and alarm systems: Stand-alone smoke / heat detector

Consultation proposal:

Vessels of more than 6 metres but less than 15 metres in length would require standalone smoke detectors and alarms (e.g. smoke detectors commonly found in homes) or heat detectors and alarms if they have an inboard engine or an electrical energy storage system with an output of 120 kW or more. Vessels would need to meet this requirement when the rules come into force.

Support / did not support	What submitters said	Maritime NZ's response
Support	If the crew are asleep, or otherwise occupied they may not notice if a fire starts and gains a hold in the ER, or the accommodation unnoticed	No changes are proposed. This proposal appears to have general support. This proposal reflects the approach required under the Australian National Standard for Commercial Vessels (NSCV). The cost for operators would be low.
Support	Any new measures to reduce risk to the safety of lives at sea should be embraced by industry	
Support	Support	
Support	Support	
Support	Why would you not? How many people die in their sleep unaware there is a fire?	
Support	Sounds ok	
Did not support	Don't want smoke alarms on boat, just another hassle. Will stuff up our fatigue management if it wakes us in the middle of the night with low batteries.	

Fixed fire extinguishing (FFE) systems

Consultation proposals:

A fixed fire-extinguishing (FFE) system would be required for the following vessels:

- **A vessel with an enclosed engine space, with an engine (or engines) with a total power of 375 kW or more, and the vessel carries:**
  - **passengers in the coastal limit; or**
  - **37 or more day passengers; or**
  - **any berthed (i.e. sleeping) passengers.**
- **A vessel of 15 metres or in length overall (LOA).**
- **A vessel that is more than 6 metres in length that has an inboard engine of 120 kW or more used for main propulsion.**
- **A vessel with an electrical energy storage system (EES) of 120 kW or more output used for main propulsion.**
- **A vessel with an inboard petrol engine (that is, a petrol engine in an enclosed machinery space).**

A space that requires a FFE system would to be gastight to the extent that the FFE medium would be contained in that space.

Vessels with an engine space of 10 cubic metres or less would be able to use a portable fire extinguisher to discharge into the space instead of having a FFE system.

Existing vessels would have 2 years from when the new rules come into force to meet these requirements.

Topic	Support / did not support	What submitters said	Maritime NZ's response
General response	Support	Yes, makes sense.	**Response** See responses to specific proposals below. **Comment** Support for this proposal and for the proposed transition timeframes was mixed, with slightly more support than opposition.
	Support	I think this is reasonable given that we will have time for the upgrades required.	
	Support	Makes sense, provided those vessels not now required to carry fire hoses / pumps etc, have the equivalent source of FFA, such a portable extinguishers, fire supressing grenades etc to replace that capacity, but whatever they use instead, cannot be less effective or provide less FF capacity.	
	Support	We generally support the proposal. All of our vessels currently have fixed fire suppression systems in the engine rooms and generator voids. Fixed fire extinguishing systems are quick and easy to activate, providing the best chance to control the fire. Opening hatches to deploy hand held fire extinguishers risks backdraft, risks the safety of the crew unnecessarily and requires a higher degree of skill/risk to deploy correctly.	
	Support	Should be standard for any new vessel. If space and design allow, it's a better HS option for existing vessels	
	Support	We operate some vessels which will require new fixed systems with an estimated cost of $30,000 per vessel. While this incurs additional cost, we accept this requirement as we cannot substantiate any reason not to proceed with the installation.	
	Support	Fixed FFA systems such as Sapphire are relatively cheap and very easy to install, the operator can install, where the supplier signs off, and the system surveyed annually as before. Fire suppression grenades. There are a number of relatively cheap and easy to install options out there.	

Topic	Support / did not support	What submitters said	Maritime NZ's response
	Support	See previous comments. Because there are systems which are very easy to install, very effective, less hazardous to people, that are available.	
	Did not support	Bit of a hassle, not even possible for my boat, I would have to encase my motor somehow. How would we be able to service our motor if this was encased. Just not possible with our vessel design.	
	Did not support	We oppose the regulation of the need for any fixed or automatic fire extinguishing devices.	
Comments	Comment	While I agree that the addition of FFE system does increase the ability to fight a fire with less risk to crew, there are a couple of points that may not have been considered. (1) The ability for a FFE to work efficiently is based on a volumetric calculation assuming the space can be closed off (fire dampers etc). For some vessel's general arrangement may make it problematic to achieve that easily, if for example a workshop is part of the machinery space, that then leads into store in the same space for example, the volume of the required fire retardant is greatly increased. Where the required retardant volume is increased the calculation to determine the piping sizes etc also increases correspondingly, bringing with it increased costs. The solution may be the addition of bulkhead and doors to create segregation and a smaller volume that requires FFE. (2) For vessels where an inboard petrol engine is installed and a FFE is fitted it should be noted that the risk with inboard petrol engine is not only fire, but also explosion. Inboard petrol engine vessels should focus on detection of petrol fumes in addition to an FFE.	**No changes are proposed.** Comment 1 noted. Regarding comment 2, the draft Machinery and Ancillary Equipment Rules require a hydrocarbon gas detector.
	Comment	Fixed fire suppression systems such as FirePro have the smoke and heat detection alarms incorporated into the activation panel. It would be beneficial if the rules allow for this explicitly, rather than separate panels.	**No changes are proposed.** The draft Rules and MTI already provide for joint arrangements for the alarm panel and FFE activation.
	Comment	Under section 8 clause 8 of the MTI, we would support an explicit mention that the maintenance /instruction/operation manual can be carried onboard digitally, or made available ashore if vessel maintenance is exclusively carried out ashore and operating instructions are visible on or by the fire suppression activation panel.	**Response** Draft MTI clause 8.2(8) includes a requirement for the vessel to carry an instruction manual covering the operation and maintenance requirements for the FFE system. Maritime NZ will revise this clause to include digital information.
	Comment	[Operator] noted that they have F500 portable fire extinguishers for use when there is a lithium-ion battery fire. It appears to be an extinguisher that uses lithium gel to: • interrupt the chemical process that leads to thermal runaway; and • prevent thermal propagation by providing a thermal insulation between cells. They come in a range of sizes, including 4 litre and 9 litre, and comply with AS 1841.2 (and therefore our proposed rules) as a water-based extinguisher with an additive suitable for Class A, B, and F fires.	**No changes are proposed.**

Topic	Support / did not support	What submitters said	Maritime NZ's response
Transition time frames	Did not support	Where a vessel (under 15m) requires a simple addition of an injection port and a portable extinguisher then I agree with 2 years. Where a vessel requires an engineered system, or the addition of bulkheads/doors for separation it should align with intermediate or renewal survey with the minimum interval of 3 years, but no greater than 5 years so the works can be aligned with a planned vessel outage.	**Response** In response to consultation feedback, Maritime NZ is reviewing and aligning the transition timeframes for all proposals, and these will be consulted on as part of the public consultation on the Survey and Certification Rules. The transition timeframe to meet the proposed fire suppression system requirements will be included as part of this work.
Exposure to suppressants	Did not support	These are a health hazard and are dangerous if faulty.	**Response** Maritime NZ will clarify the rules to ensure that the means to activate the FFE system is in a safe position on the vessel. **Comments** To mitigate risks to health, the draft rules are designed to protect people from being exposed to FFE chemicals by requiring a 2-stage activation (including a warning) to ensure that there is nobody in the space when the extinguishing medium is released.
	Comment	The path that the crew will take to reach the point of fire-retardant injection needs to be carefully considered. The space in which the fire is occurring will emit poisonous fumes (while compartments are often deemed airtight in reality they never really truly are) so the route to that point needs to be such that the crew are not put in danger from these fumes, and the structure will not fail beneath them during this operation.	
Handheld fire extinguisher	Did not support	We note that there is a proposed requirement under Section 9 of the Maritime Transport (Fire Protection) Instrument to also have fire extinguishers inside these compartments. We would consider these to be redundant due to the fixed fire suppression system covering the space, and trying to enter the space after the fixed fire suppression system has been activated would introduce oxygen to the space and do more harm than good. The primary fire suppression method for these machinery spaces on these 15-24m vessels should be the fixed fire suppression system, with no other extinguishers carried inside the space.	**No changes are proposed.** Requiring fire extinguishers in an engine space is a common approach across jurisdictions. It provides a practical way to extinguish a small fire before it develops to a point where activation of the fixed system is required.

Structural fire protection: Requirements for new vessels

Consultation proposals:

New vessels entering the fleet would require structural fire protection (SFP) with fire resistant divisions if they:

- **Are 24 metres or more in length; or**
- **Are 15 metres or more in length and operate in the offshore limits or the unlimited area; or**
- **Carry any berthed passengers and operated in coastal limits; or**
- **Carry more than 36 berthed passengers in any operating area.**

The draft Maritime Transport Instrument (MTI) provides detail about SFP requirements:

- **Much of the MTI content carries over current requirements, with some consolidation and harmonisation between vessel types.**
- **Vessels of less than 35 metres in length would require a 30-minute fire rating. Vessels of 35 metres or more in length would require a 60-minute rating.**
- **An electric vessel with propulsion machinery of 120 kW or more output would require fire-resisting divisions in the space where energy storage system (batteries) is located.**
- **New requirements address fire-resisting divisions made of fibre reinforced plastic (FRP).**

Support / did not support	What submitters said	Maritime NZ's response
Support	Support	**Response** Maritime NZ will revise the structural fire protection (SFP) provisions where vessels are powered by electrical energy storage systems, to set requirements based on battery / EES capacity rather than propulsion power. The approach to SFP for EES outlined in the recent consultation on the Fire Protection chapter (C4) of Australia's NSCV will be considered as part of this work. **Comment** The structural fire protection proposals for new vessels were generally supported. The draft rules require fire rated divisions if a new ship has "an electrical energy storage system used to power main propulsion machinery of 120 kW or more output". We agree that the clause should address the capacity of the battery / EES and not propulsive power.
Support	Fire resistant bulkheads for example, and fire resistant materials are a no brainer. Why would you not include them in a new build irrespective of size, function and area of operation. Retrofitting is not often possible so while you have a blank canvas, do it.	
Support	This is the best opportunity to fit fire boundaries with SFP. It also offers a degree of acoustic treatment assisting with fatigue induced by noise.	
Support	The proposal closely follows the SOLAS Classed vessels which is a good standard.	
Support	Yes, these are fairly standard requirements globally	
Support	The cost and design can be incorporated during design and build stage and therefore is a known upfront cost which can be managed appropriately.	
Support	Support proposals	
Comment	No comments other than supporting a tabled, flexible approach to structural fire protection so that a vessel has an appropriate level of structured fire protection based on vessel size, operation, and risk.	
Comment	EES [Electrical Energy Storage] SFP should be based on EES capacity not propulsive power. EES SFP should be linked to op limit and time/range to rescue. Length of vessel has little relevant to EES fire protection needs. 35m is too high to be meaningful protection anyway	
Comment	FRP solutions will prove difficult to comply [with] due to the broad range of composites & thickness.	

Structural fire protection: Requirements for existing vessels

Consultation proposals:

The following vessels already in the domestic commercial fleet would need to have structural fire protection with fire resistant divisions within five years of commencement date:

- **All vessels of 24 metres or more in length that operate in the coastal or offshore limits or the unlimited area.**
- **A vessel of 24 metres or more in length that carries more than 36 berthed passengers in any operating limits.**

Support / did not support	What submitters said	Maritime NZ's response
Support	Sounds fair	Response Maritime NZ is reviewing and aligning the transition timeframes for all proposals. This work will include timeframes to fit structural fire protection to an existing high fire risk vessel of 24m or more in length. Considerations will include whether 10 years would be more practicable, and whether a fire detection and alarm system and a fixed fire extinguishing system would be an effective mitigation for an existing vessel of 24m or more that lacks SFP. Considerations will also include ensuring appropriate life-saving appliances are available if SFP requirements are reduced for an existing vessel of 24m or more. Comment Submitters appear to support structural fire protection proposals for new vessels entering the fleet. Submitters were concerned about the cost and practicality of applying requirements to existing vessels. Maritime NZ understands that retrofitting structural fire protection would be a major undertaking that may not make financial sense in terms of the costs of the work measured against the value of the vessel. An initial assessment of vessels in the fleet that are over 24m in length indicates that many are aging and may reach the end of their lifespan if the transition period was set at 10 years rather than 5 years. In this sense, 10 years may be a better period, as operators would have ample time to plan for and purchase new vessels or retrofit existing vessels. Structural fire protection is one of several measures designed to ensure a vessel is appropriately protected in the event of fire. Consideration of extended time frames for retrofitting structural fire protection will include the requirements for other key fire safety measures – including whether the vessel has early detection and effective fire suppression / extinguishing systems. Ensuring that any changes to the Fire Protection proposals align with the settings proposed for the rules for Life-saving Appliance and Accommodation, Access, Escape, and Personal Safety. These three sets of requirements must work together as they are designed to collectively ensure survival in an emergency. For example, a liferaft may provide a means to remain safe if the fire protection systems on a vessel are overwhelmed in a fire
Support	Support	
Support in part	I do agree though qualified materials certified A60 & A30 for FRP structures are very limited and very expensive often creating confusion on suitability do to the material composition. Steel & Alloy not so bad. Removal & Reinstatement of all equipment fixed to the fire boundary would be costly. Added weight to the vessel would also need to be taken into performance calculations in larger engine rooms.	
Did not support	We cannot support the need for structural fire-resistant structures to be retrofitted to existing vessels. We would however expect that new vessels would incorporate such features as a design standard subject to practicality, discretion and cost.	
Did not support	C3.2(1) Type and Design – there is reference to existing ships. This should be removed as it is not feasible to make structural fire protection modifications to any existing ship.	
Comment	"If a transverse fire division had to be installed below main deck the costs would come for the following, but not limited to: Naval architect fees. Surveyor attendance fees. Drawing approval fees. Modification of existing drawing fees such a Fire and Safety plan, docking plan, GA, profile plan etc. Stability book review and approval. Dry dock fees as welding to hull structure. Repair of hull coatings relating to hot work Cleaning and gas free of any fuel tanks related to hot work. Waste disposal fees. Electrical disconnections of cable run to install fire resistant cable glands. Plumbing (domestic systems) disconnections and reconnections. Construction fees of division. Cooling system connections. Hydraulic connections. Install of insulation fees. Control system reconnections. Ventilation assessment and re-routing. Emergency escape assessment and modifications. There will be more."	
Comment	If it can be retro-fitted, possibly a 'nice to have' but if the vessel was built under pre-existing Class or survey requirements, it probably has SFP anyway, however it may not be practical to retro-fit as cost may play a significant part here. If there are major structural alterations being done, then it would make sense to include SFP with these upgrades.	
Comment	It is not often practical to retrofit unless that is part of a major refit. However, SFP doors / closures could be retrofitted with little destructive alterations to surrounding bulkheads etc. We have a program with our vessels fitting modern SFP doors throughout our ships.	

Comment	For some vessels the addition of SFP may simply be an upgrade of the current general arrangement however for some vessels this may require significant structural changes, some of which may need to be installed with the vessel out of water. For some operators this may signal the end of the vessel's suitability to be employed, together with the crew etc.	
Did not support	Another area of concern is Section 3(4) – Structural Fire Protection. This clause lacks clarity regarding internal stairways. If structural changes are required to enclose an internal stairway that connects a saloon to the forward cabins, this is impractical. We urge that more consideration be given to the MTI before its implementation.	**Response** Maritime NZ will revise the proposed SFP requirements in MTI clause 3.2(4) applying to internal stairways so that existing vessels are not required to comply (i.e. grandparenting would apply). **Comment** The current rules require internal stairways on passenger vessels to be enclosed with smoke-tight divisions of non-combustible or fire restricting materials if - The stairway serves more than two decks of accommodation; and - The vessel is 35 metres or more and proceeds beyond restricted limits or carries more than 36 berthed passengers. The technical requirements in the proposed MTI are like the current rules but apply to all vessel types and would apply from 24m not 35 metres. We agree that it would be impractical for an existing vessel to make structural changes to align with this requirement and will revise the draft rules to allow existing vessels to be grand parented.

Gas fitting work and LPG installations

Consultation proposal:

Gas fitting work and LPG installations would need to be carried out by a registered and licensed gasfitter, who would need to provide a gas safety certificate to the vessel's operator.

Support / did not support	What submitters said	Maritime NZ's response
Support in part	New installations yes, as long as a system is not leaking or dangerous from corrosion or age it should be left alone.	**No changes are proposed.** This proposal appears to be supported.
Support in part	This sounds reasonable. Corrosion or age it should be left alone.	

Firefighter's outfits and self-contained breathing apparatus

Consultation proposals:

A vessel of 24 metres or more would need to have a minimum of 2 firefighters outfits and 2 sets of self-contained breathing apparatus. This generally carries over current requirements, with the following differences:

- **Passenger vessels of less than 24m that carry more than 36 day passengers or 12 berthed passengers currently require 2 firefighters outfits and breathing apparatus [the proposal would reduce requirements.]**
- **Non-passenger vessels of 24m or more operating in inshore limits currently require 1 firefighters outfit and breathing apparatus [the proposal would increase requirements.]**

Support / did not support	What submitters said	Maritime NZ's response
Support	We carry 4 x SCBA sets and 12 x spare BA bottles. The larger the vessel arguably the more equipment is needed as there may be several fire parties covering a larger area.	**Response** Maritime NZ will reconsider the proposals for firefighter's outfits and self-contained breathing apparatus, including whether the proposed inshore threshold for non-passenger vessels should move to coastal, and whether requirements should more closely align with the Australian National Standard for Commercial Vessels (NSCV). Maritime NZ will reconsider the proposals for firefighter's outfits and self-contained breathing apparatus, including whether the proposed inshore threshold for non-passenger vessels should move to coastal, and whether requirements should more closely align with the Australian National Standard for Commercial Vessels (NSCV). Considerations will also include ensuring appropriate life-saving appliances are available if these requirements are reduced. **Comment** This proposal received mixed support. It is possible that some submitters did not appreciate that the proposal would reduce requirements for vessels under 24m that currently require firefighters outfits and breathing apparatus. The proposal would potentially impact around 50 non-passenger vessels of 24m or more that operate in enclosed or inshore limits. These vessels may carry 1 firefighter outfit and self-contained breathing apparatus. However, it is not safe or practicable for one person to fight a fire and some of these vessels may already carry 2 sets. The NSCV (Part C Section 4 – Fire Safety, Table 2, page 18) requires firefighter's outfits for fire risk category IV vessels operating in Areas A, B or C. This is equivalent to vessels of 37-200 passengers in the unlimited area; 202 – 450 passengers in coastal limits or beyond; 13-36 berthed passengers in the unlimited area; or 37 or more berthed passengers in coastal limits or beyond. These would all be classed as High fire-risk vessels under the proposed new rules.
Support	Yes, makes sense	
Support	Support	
Did not support	Firefighters' outfits should apply to vessels in the Offshore and Unlimited areas only. Applying this requirement to all medium and high-risk vessels, regardless of their size or operating limit is impractical. Several vessels would not be able to comply with the rule or the exception.	
Did not support	We cannot support the call for firefighting suits or breathing apparatus and again leave that to the discretion of the vessel operator. We would not expect low risk vessels to be required to have firefighting suits or breathing apparatus.	
Comment	Carrying this equipment also requires consideration of amending Maritime Rules Part 31 to include a requirement for crew training in this equipment (e.g. STCW Basic Fire Fighting course). Most restricted limits vessels will be operated by crew that have not been required to complete STCW basic training covering the use of this equipment, making the carriage of the equipment ineffective.	
Comment	This rule should potentially also factor in how close the vessel is to shore based emergency response, or operating limits (e.g. carrying this equipment may be redundant within enclosed limits due to close vicinity of shore based assistance, assistance from other vessels within harbours).	

Emergency escape breathing devices (EEBDs)

Consultation proposal:

Vessels of 24 metres or more would need to have a minimum of two Emergency escape breathing devices (EEBDs) in machinery spaces. The current rules do not require any vessels to carry EEBDs.

Support / did not support	What submitters said	Maritime NZ's response
Support	Yes, makes sense	**No changes are proposed.** This proposal received mixed support. Not requiring EEBDs in a machinery space with two escape paths would have the risk that in an incident an exit could be blocked, or that the space is filling with toxic gases necessitating the immediate use of an EEBD.
Support	Support	
Support in part	What are you going to do with two? Totally inadequate. An EEBD should be placed in every machinery space, shaft tunnel, steering flat, refrigeration room, freezer hold, workshop etc, i.e. any spaces deemed as potential enclosed spaces if in a fire situation. Depending on crew numbers likely to be working in that space, then additional EEBDs so everyone can have access to one. Our ships carry 16 across their machinery spaces.	
Did not support	EEBD's are employed where the crew may have to evacuate a high-risk space and have to move through the toxic environment to escape. Where a machinery space is fitted with a main exit point and an emergency escape positioned at the opposite end of that space the crew can escape without the need to transit through the hazardous area. The requirement to install EEBD's should be after the owner/operator has had the space assessed and it has been determined there is only a single escape path.	
Did not support	Support in principle, but with changes to the MTI necessary with respect to the application of this rule. We do not support this section of the MTI. [section 11]	

Fire hose appliances (Pump; Main; Hydrant; Hose; Nozzle)

Consultation proposal:

The current fire appliance rules have been consolidated and harmonised across ship types. Most proposed requirements are like the current rules, but no fire appliances would be required on vessel of less than 15 metres in length.

- **A high fire-risk vessel of 15 metres or more in length, and a vessel of 24m or more in length would require 2 main fire pumps, 2 fire hydrants and 2 hoses and nozzles.**
- **A vessel of 15 metres or more in length and less than 24m would require 1 main fire pump, 1 fire hydrant and 1 hose and nozzle.**
- **Portable fire pumps would be allowed as emergency fire pumps (not currently permitted).**
- **Hand operated fire pumps would not be a part of the new rules.**

Support / did not support	What submitters said	Maritime NZ's response
Support	Good	**No changes are proposed.** Submitters generally supported the fire appliances proposals. The proposed operating pump pressures align with the Australian National Standard for Commercial Vessels (NSCV).
Support	Sounds Good	
Support	Makes sense, provided those vessels not now required to carry fire hoses / pumps etc, have the equivalent source of FFA, such a portable extinguishers, fire supressing grenades etc to replace that capacity, but whatever they use instead, cannot be less effective or provide less FF capacity	

Support / did not support	What submitters said	Maritime NZ's response
Support	Fire hoses appliances are difficult to manage, particularly in confined spaces where the use of portable appliance can be more effective.	
Support	It is well understood that two crew are required to use a fire hose arrangement.	
Support	We support removing the requirement to have hand operated fire hose pumping arrangements.	
Support in part	I agree with the reduction of the pumping capacity reducing from 25 cbm as this requires a large pump that requires an equally large energy source and has the capacity to deliver a large volume of water. This can pose risk around down flooding and listing, ultimately ending of capsize. However, I don't agree with the reduction in operating pressure of the pump as this will reduce the distance that a water jet can be projected and the effectiveness of a water spray curtain. Have you investigated the pressure and volume requirements of the nozzles in question to see if this pressure reduction still meets the operational requirements? A shorted water jet will require the crew to get closer to the fire.	
Comment	Depending on the size of the vessel, it may not be practical [to have fire hose appliances] provided they have other FF systems on board in its place that will provide the equivalent FF capacity.	
Comment	Three of our four fire pumps are currently engine driven ancillary pumps running off our main propulsion. We agree that having the fire pump operated through a separate system to the main engines is more resilient, but also note that if the power sources for the fire pump are in the same compartment as the main propulsion machinery then the intent is redundant.	

Interior surface finishes and fit-out; Flammable liquids; Portable fire extinguishers; Fire blankets; Buckets; Sand and Non-portable fire extinguishers

Consultation proposals:

Requirements for surface finishes and fit out are like the current rules but differentiate between spaces according to fire risk and reference more standards. Requirements for fire blankets and Highly Flammable Liquids are much the same. Requirements for portable fire extinguishers have been clarified but are much the same. A fire bucket would only be required if a vessel is less than 15 metres in length and does not have a fire hose. Requirements to carry sand and non-portable fire extinguishers would be removed.

Topic	Support / did not support	What submitters said	Maritime NZ's response
Interior surface finishes and fit-out material	Support	C4.1 and C4.2(1) Support	**No changes are proposed.** These proposals were supported.
Portable fire extinguishers and fire blanket	Support	Support	
Highly Flammable Liquids	Support	Support	
Sand and non-portable fire extinguishers	Support	Sand buckets are only used for the crew to extinguish their cigarettes.	
	Support	Outdated and far less effective as modern portable fire extinguishers, and other FF options available.	
	Support	We agree with this proposal. There are now more modern solutions readily available.	
	Support	Support	

Topic	Support / did not support	What submitters said	Maritime NZ's response
Fire buckets	Support in part	We have vessels under 15m that have fire hoses. We would support an explicit clause in the MTI stating that a fire hose can be carried in place of fire buckets to cover this scenario. We have seen minimal gain from the carriage of fire buckets onboard over the last 18 years, and they have limited effectiveness on our vessels compared to using the fire hose for boundary cooling etc.	**No changes are proposed.** MTI clause 12.6(1) only requires a fire bucket if the vessel does not have fire hose appliances.
	Support	OK	

Fire Control Plans

Consultation proposal:

High fire-risk vessels of any length; medium fire-risk vessels of 15 metres or more in LOA; and vessels of 24 metres or more in length would require a fire control plan.

Support / did not support	What submitters said	Maritime NZ's response
Support in part	We support the C13.1 in principle but the MTI thresholds for Fire Control Plan are set too high. We do not support Section 13 of the MTI.	**Response** Maritime NZ will consider whether the proposed thresholds for Fire Control Plans should more closely align with Australia. **Comment** This proposal to carry a fire control plan would be a change for: - Passenger vessels that are less than 24 metres in length and carry more than 37 day passengers or any berthed passengers. - Fishing vessels of more than 15 metres and less than 60 metres in length. - Non-passenger vessels that are more than 15 metres and less than 24 metres in length. The Australian National Standard for Commercial Vessels (NSCV) requires a fire control plan if the vessel is 25m or more in length; or carries dangerous goods; or carries 37 or more day passengers in coastal and offshore limits; or carries more than 12 berthed passengers in any limits.

Existing vessels – transition arrangements, general

Consultation proposals:

An existing vessel would need to meet the following requirements 2 years after the commencement date:

- **Fixed fire detection and alarm system [This would not apply to all vessels. Refer to the sections below on Fire Detection systems.]**
- **Fixed fire-extinguishing system in the machinery space and spaces with a petrol engine [This would not apply to all vessels. Refer to the section below on Fixed Fire Extinguishing systems.]**

A high fire-risk ship of 24 metres or more in length would need to meet structural fire protection requirements 5 years after the commencement date. [This is discussed below under the heading 'Structural fire protection. Requirements for existing vessels'.]

Support / did not support	What submitters said	Maritime NZ's response
Did not support	Support. Existing vessels to be grandfathered where modifications to the vessel are necessary.	**Response**
Did not support	Support, provided existing ships are grandfathered and not required to meet these requirements.	

Did not support	Somewhat support provided existing ships are exempt from any of these requirements, other than where practical, i.e. portable detectors/alarms. It is not feasible to require existing operators to install control panels or install new equipment to accommodate these new requirements	In response to consultation feedback, Maritime NZ is reviewing and aligning the transition timeframes for all proposals. These will be consulted on this as part of the public consultation the Survey and Certification Rules, expected to be by mid-2026. **Comment** Submitters generally did not support proposals that would require an existing vessel to fit additional systems or modify the vessel. The Maritime NZ response is addressed under the specific proposals.
Did not support	Somewhat support provided existing ships are grandfathered and not required to meet these requirements.	
Did not support	We do not support this schedule. There are several sections within this part that [the organisation] does not support with respect to existing vessels. [The organisation] believes these vessels should be grandfathered. After evaluating the associated risk factors, we find no reason to apply these changes. Maritime New Zealand has not presented sufficient evidence indicating systemic failures or incident and accident statistics. Therefore, we see no justification for Maritime New Zealand to impose new regulations on the existing fleet.	
Comment	The cost of retrofitting could be expensive. Have limited experience when removing a part to do work. Notes that costs have gone up, with increases for materials but especially labour, which was around $80 an hour not long ago to $100 per hour now.	

Appendix 2: Machinery and Ancillary Equipment Rules and Maritime Transport Instrument: Detailed submissions and proposed responses

Machinery and Ancillary Equipment Rule design, and general comments

Consultation proposals:

The proposed new rules would consolidate and harmonise the machinery rules across vessel types, where applicable.

The arrangement of rules has been standardised across the different topics.

Support / did not support	What submitters said	Maritime NZ's response
Support	Support	**Response** Maritime NZ is addressing concerns about changes to scope of certification as part of the Survey and Certification draft Rules, due for public consultation as part of Package 3 in 2026. As part of the implementation of the new rules, Maritime NZ will provide consolidated versions that include cross references and commentary to make it easier for users to understand and navigate the requirements. **Comment** Comments noted. The arrangements of rules and MTI's is required to deliver requirements that can be more easily amended – for example in response to sector changes.
Support	Support	
Support	Support	
Support	Streamlining and harmonising the rules regarding the number, type, and capacity of bilge pumps simplifies the regulations.	
Support in part	Support B1.1 but have concerns about the need for B1.2 to B1.5, as these responsibilities are already covered by other regulations, such as MR19 and 44. For example, B1.3(b) concerning the interpretation of certification scope has caused confusion when a vessel adjusts its limits to match its existing certification requirements or decreases passenger or crew numbers. In these situations, a full survey isn't necessary. Suggest either removing this clause or providing further clarification.	
Did not support	[The] Sequence of rule does not support natural flow of determine requirements. i.e. it is not possible to assess steering before understanding the propulsion machinery. Unnecessary prescription obscures overarching safety outcome and prevents adaptation to system configuration e.g. C3.2(18). Has not resolved the areas missing form [sic] current rule. Stopped after tank section.	
Did not support	As per the fire rules, these rules as drafted are difficult to cross reference between the Rule and the MTI. This needs further work	

Fuel systems and fuel tanks

Consultation proposals:

The proposed new rules would:

- **Allow Fibre reinforced plastic (FRP) and thermoplastic freestanding fuel tanks on all vessels.**
- **Not allow tanks integral with the hull structure if the fuel has a flash point below 60 degrees Celsius.**

Most requirements in the proposed rules have been carried over from the current rules. These are similar across vessel types, and requirements have been consolidated and harmonised.

Topic	Support / did not support	What submitters said	Maritime NZ's response
FRP and plastic fuel tanks	Support	The tanks should be constructed such that the piping fittings are well secured and that vibration will not allow the fitting to work lose or crack that tank.	No changes are proposed. Proposal appears to be supported. Suggestion Noted.
	Support	If the technology is there, use it	
	Support	Sounds good	
	Comment	As for use of plastic [bilge] pipes and fuel tanks, we leave that to the discretion of the operator, knowing that they will not compromise the safety of their vessel by using inappropriate fittings.	
Testing of fuel tanks	Comment	No fuel tank pressure tests other than integral tanks. NOT ACEPTABLE. Puts you out of step with most other rules. Integral tanks tested to 0.3Bar. Puts you out of step with all other rules, the principals of naval architecture. Inform units please. kPa is the modern standard unit of liquid fluid pressure.	**Response** - Maritime NZ agrees that fuel tanks should be tested. We will revise the draft to include a minimum pressure. - Maritime NZ will revise the draft to use kPa as a measure rather than bar. **Comment** The Australian National Standard for Commercial Vessels (NSCV) Part C5A specifies that tanks must be tested to 2m of head, which equates to around 20 kPa. The MTI requires non-portable thermoplastic tanks to be constructed in accordance with ISO 21487 or ISO 10088. Both include test requirements to around 20 kPa. It will be helpful to include a measure in the rules. The .3 bar measure for integral fuel tanks was carried over from the current rules. It equates to around 30 kPa. We agree that kPa is a better measure to use.
Hydrocarbon detector	Comment	Hydrocarbon detectors for diesel fuel tanks - What safety issue?	**Response** Maritime NZ agrees that a hydrocarbon detector should apply to low flashpoint fuels. The draft rules will be revised to reflect this.

Topic	Support / did not support	What submitters said	Maritime NZ's response
Integral [petrol] fuel tanks	Did not support	I would like to formally lodge my feedback regarding consultation on Integral Fuel tanks. I believe on aluminium constructed hulls, fuel should be able to be contained in integral fuel tanks with conditions. Some issues would be if electric wires were present in the hull, or fumes could pass to other compartment etc. Advantages with integral tanks they have superior constriction strength and far less chance of splitting the normal contained fuel tanks. Extremely low maintenance. Inspection ports a must 30 years in 4 vessels – no issue. 3 years with bult in fuel tanks, splitting at holding points, showed a construction issue always present. They do exist in aircraft, namely the Boeing 707.	No changes are proposed. The proposed rules carry over the current rules. They are consistent with the NSCV Part C5A.

Steering gear

Consultation proposal:

The draft rules and MTI carry over the current rules.

Support / did not support	What submitters said	Maritime NZ's response
Comment	*Section 4.7 Steering gear* *A means of communication must be provided between the main steering position and emergency steering position to enable safe navigation of the ship when operating the emergency steering.* Not specified what communication type this may be. [Suggest] Include 2 * UHF radios on ships under 24m. Fixed phone or talk back on vessels above. No means required for telling course heading in new rule. [Suggest] Include a repeater for ships greater than 24m in steering flat.	No changes are proposed. The requirement for navigation equipment that enables the person steering to determine and maintain the ship's heading accurately, continuously, reliably, and under all operating conditions, and for a repeater for ships greater than 24 metres, are being considered under the new navigation rule set. This rule part and associated MTI will be considered as part of the 3rd package of consultation on the DCE rules.

Engine alarm and remote manual shutdown

Consultation proposals:

Engine alarm: Engines of 120 kW or more would require an engine alarm (visual or audible) to indicate abnormal engine conditions.

Engine shutdown: A remote manual shut down (or kill switch) would be required where the engine is not readily accessible from a permanently manned control station.

Existing vessels would have a 5-year transition period to meet these requirements.

Support / did not support	What submitters said	Maritime NZ's response
Support	All vessels with an enclosed ER should have an alarm system	**Response** Maritime NZ will include grandparenting provisions so that existing engines would not need to require an engine alarm and remote shutdown. Maritime NZ will revise the drafting to include electrical means of engine shut-down. **Comment** These proposals appear to be supported. However, retrofitting requirements to existing engines may not be practicable at reasonable cost. The proposed 120 kW threshold for when an engine alarm would be required (rule C5.2(14)) aligns with the 120 kW threshold proposed in the draft Fire Protection Rules for when fire detection and fire suppression systems would be required. This threshold was chosen to align with the Australian National Standard for Commercial Vessels (NSCV). Many New Zealand commercial vessels are sourced from Australia, and alignment with Australia, to the extent practicable, is a guiding principle of the design, construction and equipment reform project. Maritime NZ is aware that that the 120 kW threshold does not align with the 130 kW threshold specified in Maritime Rules Part 199 for when an Engine International Air Pollution Prevention Certificate (EIAPP) is required.
Support	Most engines will already have these fitted and are crucial in determining the safe operation of the engine and give pre-warning of a serious malfunction.	
Support	Support	
Support	Support	
Support	Sounds like a good idea. We currently meet this requirement	
Support	We support the proposal, noting that we assume OEM engine alarm panels and start/stop panels are sufficient to meet the rule requirement. All of our engines currently have alarm panels and start/stop arrangements from the wheelhouse/helm station.	
Did not support	We do not support the need for all low risk vessels to have alarms for abnormal engine conditions. We are aware that new engine and hydraulically driven machinery normally have such alarm systems built into the operating systems. We do not consider it reasonable for an operator with an old engine without such sensors to be required to fit such sensors but would recommend that any replacement engines should have the functionality to warn the operator of abnormal conditions.	
Support	Simple to install on most engines. [*Remote manual shutdown*]	
Support	Sounds fair. [*Remote manual shutdown*]	
Support	Support	
Support	Support	
Comment	*Section 5.2.10 Main and auxiliary machinery* *If a main engine in a ship is located in a space that is not readily accessible from a permanently manned control station, a manual mechanical means must be provided— (a) (b) to enable the engine to be quickly shut down from a location outside the engine space; and that is capable of operating when exposed to flame and heat from a fire within the engine space.* Most remote shut downs are electric with a solenoid valve on the governor/fuel rack. [Suggest] Amend to “Manual or electric”. *5.2(14) Subrule (13) does not apply in the case of an engine that has propulsion power below 120 kW.* [Suggest] Amend to 130 KW to align with IAPP	

Restriction on installation of ammonia plant

Support / did not support	What submitters said	Maritime NZ's response
Comment	*C.5.5 Restriction on installation of ammonia plant* There are a few factory trawlers that have ammonia plant in the ER. Yes they are old, but this will stop them overnight as no grandfathering provided. [Suggest] Allow existing ships to continue but require all new ships to comply.	**No changes are proposed.** The section on "Refrigeration systems for preservation of catch and cargo" has been removed from the draft Machinery and Ancillary Equipment Rules because these requirements are relevant to large fishing ships. The advice to the project team is that ammonia refrigerant systems are not used on smaller vessels. Large fishing ships of 24 metres or more (both new and existing vessels) will be subject to Part 404: Design, Construction, and Equipment – New Zealand Cape Town Vessels and Foreign Cape Town Vessels. These rules contain detailed requirements including how to treat refrigeration plant located in a machinery space.

Roll over safety valve

Consultation proposal:

Roll-over safety valves would be required for vessels of less than 12m with a petrol fuel system and a planing hull.

Support / did not support	What submitters said	Maritime NZ's response
Support	All means should be employed to control petrol vapours in all conditions as the risk of escaping vapours is explosion, amongst others.	**Comment** This proposal appears to be supported. A 2-year transition period would apply to fitting a vent pipe roll-over safety valve. This would help to spread the cost.
Support	We concur that bilge alarms should be fitted in any compartment where seawater can ingress and that vent pipes and rollover safety valves should be fitted on any vessel.	
Support	Support	
Comment	[Operator] raised concerns about retrofitting roll-over valves to existing fuel systems if the vent pipes were not easily accessible. In some cases, fixed deck plating may need to be removed which could make the job more difficult and costly than Maritime NZ has anticipated. This proposal would not be an issue for new vessels as this could be factored in at the design stage.	

Bilge arrangements. Bilge level alarms

Consultation proposals:

Bilge alarms would be required in fish holds, cargo holds and watertight compartments that are separate from the machinery space.

An electrically driven bilge pump (that is not in a machinery space) would need to operate automatically when a float switch or bilge alarm is activated.

Existing vessels would have 2 years to meet these requirements.

Support / did not support	What submitters said	Maritime NZ's response
Support	We concur that bilge alarms should be fitted in any compartment where seawater can ingress and that vent pipes and rollover safety valves should be fitted on any vessel.	**Response** - Maritime NZ will revise the proposed rules applying to bilge alarms in fish holds, with the aim of avoiding 'nuisance' alarms. This could be achieved by connecting the alarm to a separate float switch that would be triggered if the water level rises higher than the upper limit of the bilge pump. - Maritime NZ will review the proposed requirement for electrically driven bilge pumps to automatically activate, including working with the submitter to understand the exact nature of their opposition to automatic activation. **Comment** Submitters generally support the proposals for bilge alarms. People attending online seminars had pointed out that fish holds are typically wet and that the proposal risked generating false alarms. However, at that stage a solution was not identified. The submitter identified a practical solution that would both avoid nuisance alarms and sound the alarm if the fish hold starts to fill with water. It is common practice to have automatic operation of electrical bilge pumps via a float switch. However, the current rules provide the option to automatically activate either an alarm or the pump. If the option used is automatic activation of the pump, then a visual alarm at the control centre (for example the cockpit) is required. The proposed rules would require automatic activation of the pump – which would be a change and would not be consistent with Australia or the United Kingdom. It is possible that the opposition to this requirement is based on 'nuisance' alarms. The proposed response above would address this concern. This would need to be confirmed with the submitter.
Support	Sounds fair	
Support	Relatively simple to install. (On the matter of submersible pumps: Page 20 refers to submersible pumps and the fitting of an indicator light and no audible alarm when they are running and seems to read that this is a risk. I suggest the intended use of the pump needs to be carefully understood as there could be 2 very different uses. 1/. The pump can be used in a space that is normal a dry space and connect such that it is designed to deal with unintended water ingress, in this case a visual and audible alarm is appropriate. 2/. Submersible pumps are also used in spaces that use water as a cooling medium for fish production or the result of ice melt in holds in fishing vessels. Here the submersible pump will have its low/high level float to start and stop the pump, this is a normal condition and should not activate an alarm when the pump is running. However, the space needs to be fitted with a separate high-level alarm arranged higher than the upper limit of the pump, so that the alarm will only sound in the event that the pump fails to perform the intended duty, normally pump failure or blockage. If an alarm were to sound each time the pump operated in this application, it would be deemed a nuisance alarm and ignored.)	
Support	We support this proposal, and already have audible/visual bilge alarms at the helm station for our float switches in propulsion spaces.	
Support in part	Two years is a long time. I can't believe it should take that long.	
Support in part	This should be limited to compartments below the main deck only.	
Did not support	We cannot support the requirement for low risk vessels to have automated bilge pumps.	

Bilge arrangements. Bilge drainage

Consultation proposals:

A vessel of 15 metres or more that proceeds beyond the coastal limits would need to be able to pump and drain from every space in the ship (except the machinery space) when any one watertight compartment is flooded.

A vessel of 24 metres or more that proceeds beyond restricted limits would need to have at least two bilge suctions in the machinery space, if it is fitted with a bilge main.

Open boats of less than 12m with sealed watertight compartments would not require bilge drainage arrangements, provided the boat meets the stability rules and there is a way to check the contents of the watertight compartments.

Support / did not support	What submitters said	Maritime NZ's response
Support	Support	**Vessel of 15 metres or more that proceeds beyond the coastal limits** **Comment** Although one submitter opposed the proposal, their comment is consistent with what the draft rules are proposing. The comment on large ROPax vessels would not apply to vessels this size.
Support in part	Depends on the segregation of spaces, the number of watertight spaces and how the water ingress would impact the vessel if a space was breached.	
Did not support	All spaces should be able to be drained or pumped dry.	
Comment	[*As with comment on 24 metres vessels*] Some large ROPax designs are now proposing totally sealed and foam filled spaces	
Support	Support	**Vessel of 24 metres or more that proceeds beyond restricted limits** **Response** Regarding rule C7.2(3) (bilge main and manifold): Maritime NZ will add grandparenting provisions for passenger, non-passenger and fishing vessels of 24 metres or more in length that pre-date 27 May 2004, and sailing vessels that pre-date 10 April 2010. Maritime NZ will add provisions – aligned with the NSCV - to allow an alternative arrangement to a bilge main and manifold. **Comment** The proposal does not limit the number of bilge suctions. It requires <u>at least</u> 2. Rule C7.2(3) re-states the current rules 40A.27(4); 40C.23(3); 40D.28(4) which applied to vessels after 27 May 2004 and 40E.24(3) which applied after 10 April 2010. The NSCV (sub-part C5A, clause 5.8.2.7) allows an alternative arrangement to a bilge main and manifold in vessels of 25m or more. The NSCV rules are very similar to the Lloyds Rule for Special Service Craft (Part 15, rule 5.1.3).
Support	Most vessel will have a normal operating trim, usually up by the head, so the vessel needs the ability to pump bilges from the lowest point when in normal operation. On vessels where the forward end of the machinery space is divided by ship's structure, such as engine foundation, the vessel may require 3, two at the forward (port and starboard outboard sides) end where the division occurs, and a common aft suction.	
Support	Support	
Comment	*[C7.2 Type and design of bilge system arrangements]* *(3) The bilge system on a ship of 24 metres or more in LLL must be provided with a bilge main and manifold that— (a) (b) is easily accessible; and provided with non-return valves at the manifold for each branch line.* There are numerous existing Ro/Pax ferries which use submersible pumps for voids outside of the Engine room. These should be allowed to continue. [Suggest] Add "Or is to the satisfaction of the attending surveyor based on age and service history for an existing ship" Note existing ships may be exempted under transition?	

Support / did not support	What submitters said	Maritime NZ's response
Comment	*Bilge suction* *(8) On a ship of 24 metres or more in LLL that proceeds beyond restricted limits and in which a bilge main is fitted, at least 2 bilge suctions must be fitted in the machinery space, of which—* *(a) 1 suction must be connected to the bilge main; and* *(b) 1 suction must be a direct bilge suction led to an independent powered pump, and so arranged that it can be used independently of the main bilge line suctions.* Allow for engine driven cooling water pumps. Include in text for clarity. Note existing ships may be exempted under transition?	
Support	Drainage arrangements would be difficult to put into practical use due to space constraints.	**Open boats** **Comment** Feedback noted. The draft rules include a requirement to be able to check sealed compartments by means including but not limited to a drain plug, bung, or inspection port.
Did not support	What's the point of having a sealed compartment that is flooding (after a collision) and you can't drain it? There also should be a bilge alarm installed especially if you can't see into it! Also all WT compartments must be able to be inspected via a hatch.	
Comment	*(5) A watertight compartment may be drained into an adjacent compartment by means of a self-closing valve or cock if—* *(a) the compartment being drained is less than 7 percent of the total under-deck volume; and* *(b) the adjacent compartment is served by the bilge system; and* *(c) the valve or cock is—* *(i) fitted outside the compartment to be drained; and* *(ii) operable from a readily accessible position.* Clarification required for sealed buoyancy tanks. This is allowed in 7.2.6 for open boats less than 12m LOA	
	Avoiding contamination and pollution *(11) To avoid mixing of liquids, a connected system of pumps installed as part of bilge pumping arrangements must not be connected to tanks designed to carry liquids such as oil, water, or liquid cargo.* *(12) To prevent pollution, a compartment containing potential pollutants, including machinery spaces, must not be fitted with bilge pumps that may start automatically.* [Suggest] Allow for emergency filling of fuel tanks with ballast. Add "Except in emergency conditions" [Suggest] Amend to "Unless it discharges to a suitable sized bilge holding tank and that tank is fitted with high level alarm and the pump with a long run alarm"	**Response** Maritime NZ will revise wording of Draft Rule 3E C7.2(12) line with suggestion.
Comment	*7.2.19 - 22 Flexible suction hose bilge systems (wandering hoses)* Many ships greater than 400 GRT and with IOPP Certificate do not use their bilge system. They employ a shore based vacuum truck and discharge all bilges ashore. The rule should allow that to continue. Open the rule to all vessels.	**Comment** 16 vessels in the commercial fleet are 400 GT or more and less than 45 metres in length. 7 of these are fishing vessels operating in the unlimited area, that will be subject to Part 404 Cape Town Fishing Vessels. These rules do not refer to a bilge main; but do require a bilge distribution box. The remaining 9 vessels are presumably being certified to Classification Society rules, as the current rules do not provide for the arrangement described by the submitter.

Support / did not support	What submitters said	Maritime NZ's response
	7.2.22 Flexible hoses *If there is a risk of down flooding in the event that hatches or other weathertight or watertight covers leading to a void compartment are opened, a void compartment must be installed with a deck mounted camlock fitting, connected to a suction pipe permanently mounted within the compartment.* New requirement. Considering all compartments can be exposed to a risk for down flooding, all compartments require this? Delete as Excessive	**Comment** The provision only applies to void spaces which might be accessible, and which might otherwise not be drained by the vessel's bilge system. Such spaces represent a subset of possible below deck spaces, but need to be addressed because they could impact a vessels stability if they fill with water. The wording is based on the Australian NSCV Subsection 5A.

Bilge arrangements. Bilge pump numbers and capacity

Consultation proposals:

Requirements for the number, type and capacity of bilge pumps would be consolidated and harmonised across the different vessel types. This would align the length thresholds at which bilge pump requirements apply. This proposal is designed to simplify the rules and reduce duplication.

- **Passenger and non-passenger vessels would not be impacted by this proposal, because the proposed requirements are the same as or very similar to the current rules.**
- **Existing fishing vessels would be grand parented, as the proposal to consolidate rules is not safety-related.**
- **Requirements for sailing vessels of less than 15 metres would reduce. Requirements for sailing vessels of 15 metres or more and less than 24 metres operating in the coastal and offshore limits would increase. As with fishing vessels, grandparenting would apply to existing sailing vessels.**

Support / did not support	What submitters said	Maritime NZ's response
Support	We see the bilge pump requirements for 12-24m vessels to be appropriate. No comment regarding fishing and sailing ship bilge pump requirements.	**No changes are proposed.**
Support	Support	
Support	Support	
Support	Aligns with the fleet and easily included in the build cost and scope.	
Support	Support	
Did not support	We do not support this schedule, Regarding the grandfathering of fishing and sailing vessels for this rule, it should apply to ALL vessels. Unless Maritime NZ can provide risk-related information justifying the need for existing vessels to alter their machinery and ancillary equipment, there is no reason to impose such changes. We support this section in cases where an existing vessel is undergoing significant modifications, provided those modifications are pertinent to the structural changes being made.	**Comment** The proposed rules include grandparenting for fishing and sailing vessels because these vessel types would be impacted by the proposals to consolidate requirements across vessel types. Passenger and non-passenger vessels would not be affected because the proposed new rules specify the requirements that already apply under the current rules (i.e. there is no need to grandparent). Maritime NZ does not accept the suggestion that the capacity of bilge pumps should be left to the operator to decide. It would be expensive and inefficient for every operator to have to pay a surveyor to work out work out their specific requirements, and in practice surveyors would do this by consulting rules or standards. Comparable jurisdictions such as Australia and the United Kingdom specify bilge pump numbers and capacity.
Did not support	We cannot support Rules that prescribe the capacity of bilge pumps for low risk vessels and leave that to the discretion of the operator having taken advice from an experienced surveyor or specialist.	
Did not support	*C7.3. Number, type and capacity of bilge pumps* *(7) If independent bilge mains are fitted in the hulls of a multi-hulled ship, each independent bilge main must have 2 powered pumps, if the ship is required to have 2 powered pumps.* Excludes cross over between hulls. Delete as excessive	The bilge pump requirements for a multi-hulled vessel are existing rules carried over from the current rules 40A.28 and 40C.24. The underpinning logic is sound. These rules are not recorded by Maritime NZ as having being raised as a concern by the sector in the past.

Bilge arrangements. Electrically powered bilge pumps

Consultation proposals:

- **Electric bilge pumps and bilge level alarms would need to be powered on separate circuits. Existing vessels would have a 5-year transition period to meet this requirement.**
- **Electrically powered bilge pumps would require a manual override switch. Existing vessels would have a 2-year transition period to meet this requirement.**
- **New electric bilge pumps would require a IP67 rating.**

Support / did not support	What submitters said	Maritime NZ's response
Support	This makes sense to me	**Electric bilge pumps and bilge level alarms would need to be powered on separate circuits.** **Response** Comments on costings to fit different circuits for submersible electric bilge pumps and bilge level alarms are noted. **Comment** This proposal appears to be supported.
Support	Unless you have back up battery supplies, invariable on boats, particularly small boats which don't have back up gensets [engine powered generator], when you lose power you lose it to everything.	
Support	Provides inherent redundancy.	
Support	Support	
Support	Both changes are relatively simple to install. [*The other change here is the manual override switch*]	
Comment	[Person] said that the cost for rewiring bilge alarms to be on separate circuits from the pump was higher than we had estimated, it cost about $3000 on his vessel.	
Support	Support	**Manual override switch** **Response** Maritime NZ will consider whether an audio or visual alarm should be required when a manual override switch is used. The submitter was concerned that the float switch could be deactivated and then forgotten about – meaning that bilge could build up in the vessel. **Comment** This proposal appears to be supported.
Support	Support	
Support in part	There should be an alarm (audio / visual) when the automatic function has been isolated.	
Support in part	2 years is too long to wait	
Support in part	We note that most common bilge pumps do not explicitly state they are IP67 rated, instead referring to ISO standards 8849/8846/15083. If IP67 rating is a requirement of these ISO standards, it might be more appropriate to refer to just the ISO standard than the IP rating.	**IP 67 rating for electric bilge pumps** **Response** Maritime NZ will confirm that electric bilge pumps with an IP 67 rating are available in NZ. **Comment** An IP67 rating ensures that the electrically powered bilge pump will operate safely and effectively when exposed to water. The proposal reflects the current requirements in the Australian National Standard for Commercial Vessels Part C5A
Support	Sounds Fair	

Plastic seawater bilge piping

Consultation proposal:

Plastic sea water piping and bilge piping would be allowed as an option on vessels less than 24 metres in length.

Support / did not support	What submitters said	Maritime NZ's response
Support	If the technology is there, use it.	**Comment** This proposal appears to be generally supported, but with some clarifications and revisions as noted.
Support	Good idea	
Support	Should be fine.	
Support	Support the concept of making this a rule in an MTI rather than a frequently used class exemption.	
Support and comment	Allowing Plastic piping is a good idea. Steel sea water piping becomes corroded. It must be strong and fire resistant (as proposed) but it also needs to be well supported and bracketed so it does not chafe. For plastic pipe to be strong enough it must be thicker than steel. However, this reduces the internal diameter, restricting flow. Nickel and steel pipe with a bend typically has an elbow to ensure water flow. Plastic pipe typically does not, so there needs to be consideration given to ensure that this does not happen – e.g. perhaps testing it.	**Response** Maritime NZ will revise the MTI to add proposed standards for plastic pipe. (See also the other responses below).
Support in part	Owners need to be made aware that the internal diameter for a given schedule of pipe will be reduced due to the increased wall thickness. Additionally, plastic pipe components used 90-degree right angle bends that negatively affect the delivered volume and pressure.	**Response** Maritime NZ will revise the draft MTI to require swept bends where appropriate when plastic pipe is used.
Support in part	Where it is supplying potable water, cooling water, wash down water, and removing bilge water I see no problem with plastic piping provided it meets the structural criteria, food safety criteria etc. However, FFA [fire hose appliances?] supply must never be plastic.	**Response** Maritime NZ will revise the draft rules to clarify that plastic may not be used in fire mains serving fire hose appliances.
Comment	As for use of plastic [bilge] pipes and fuel tanks, we leave that to the discretion of the operator, knowing that they will not compromise the safety of their vessel by using inappropriate fittings.	
Did not support	MTI 6.2 (1) (2) (3) (4) (5) Type and design of plastic piping and fittings This needs a lot of work. Requires clarification with local builders to see what is being used and the rule extended to suit. The provision in the MTI mirrors the requirement of the general exemption now issued which requires [see Table below]. During a recent new build we tried to use the general exemption and found that none of the pipe used locally complied with the above. Form [sic] memory the pipe used and available complies with AS/NZ4129:2020. We are simply putting the general exemption which does not work into the rule.	**Response** Maritime NZ will revise the MTI to add more structural standards that plastic pipe may be manufactured to. Maritime NZ will review the requirements for when plastic pipe would need to be fire-resistant. This will include considering what Australia requires, and whether to align requirements with the High fire-risk thresholds proposed in the draft Fire Protection Rules.

Appendix 3: Life-saving Appliances (LSA) Rules and Maritime Transport Instrument: Detailed submissions and proposed responses

General approach to proposed new Life-saving Appliances Rules

Support / did not support	What submitters said	Maritime NZ's response
Support	I generally agree with Part 3H Life-saving appliances: Proposal summary.	**No changes are proposed.** Maritime NZ does not accept that the provision of life-saving appliances should be left up to the operator. It would be expensive and inefficient for every operator to have to work out their own requirements, and the approach would result in inconsistency, and potential harm to persons on board and for other vessels working in the vicinity who may be required to assist with a response. The road, rail and air transport modes in New Zealand and comparable jurisdictions all specify rules that transport operators must follow. In proposing changes to rules, Maritime NZ has considered incidents, Transport Accident Investigation Commission reports and the rules applied in other jurisdictions and has sought to find a reasonable balance between safety benefits and costs. A serious incident or death should not need to occur before rules to address risks are considered.
Support	Basic personal equipment to preserve life should a vessel need to be abandoned is required on all vessels for example life jackets for all persons on a vessel.	
Did not support	The provision of adequate and effective devices, practices and training to address any incident are required and are the domain of the vessel operator. We believe that Maritime New Zealand should reassess the imposition of excessive compliance requirements when introducing rules that require structural changes or additional equipment, unless there is clear evidence demonstrating significant safety benefits for these changes.	

Rule design

Topic	Support / did not support	What submitters said	Maritime NZ's response
Definitions	Support in part	For clause B1.3 – review and clarify the interpretation of major alteration and scope of certification (refer General feedback).	**Response** Maritime NZ is reviewing the definition and application of major alteration and major change to a ship's operation. These definitions are to be consulted on as part of the Survey and Certification draft rules.
General requirements	Support in part	Support in general.	**No changes are proposed.**
'Restricted coastal' limits would no longer be used as a category to determine what lifejacket and liferaft requirements would apply	Comment	Support	**Comment** The proposed new rules generally do not use 'restricted coastal limits' as a threshold. This approach is designed to provide greater clarity about what requirements would apply to a vessel, as the current rules are being applied inconsistently. Under the proposal, a vessel that is currently assigned restricted coastal limits would either need to meet the coastal limit requirements in the new rules (if operating beyond 12NM) or the inshore limit (b) requirements in the new rules (if operating in the part of the coastal limit area that is within 12NM). Guidance on the removal of restricted coastal limits as a threshold in the life-saving appliance proposals will be provided as part of implementation of the new rules.

Lifejackets: All vessels would need to carry a lifejacket for all persons on board

Support / did not support	What submitters said	Maritime NZ's response
Support	It is proven that lifejackets save lives, there are suitable lifejackets available for all limits.	**No changes are proposed.** The proposal to require vessel to carry a lifejacket for all persons on board appears to be uncontroversial. All submitters supported the proposal.
Support	Support.	
Support	In the event of an abandon ship, any person that cannot swim, unless helped by others, will perish. Even a competent swimmer without a life jacket will tire after about 20 minutes and have significantly reduced capacity to keep their head above water, this combined with a slight sea state, even as low as 1m will result in them drowning very quickly.	
Support	Yip all good.	
Support	Sounds good.	
Support	No brainer.	
Support	Of course.	
Support in part	[We support] the need for an appropriate life jacket to be available for every person on board any vessel operating at sea.	

Lifejackets: Design standards for lifejackets

Consultation proposal:

The proposed rules specify standards for lifejackets and PFDs based on where the vessel is operating.

Support / did not support	What submitters said	Maritime NZ's response
Support	Support.	**No changes are proposed.**
Support	Buoyancy vests are an accepted alternative for vessels operating within inshore fishing limits; and provided it can keep an unconscious person afloat and face upwards.	**No changes are proposed.** The proposal specifies the standards that lifejackets and PFDs must meet. PFDs would only be allowed to be used on vessels operating in enclosed water limits or inshore limits (a) - as set out in Part 2 of Appendix 1 of Maritime Rule Part 20 (Operating Limits).
Support in part	We would support a clause that specifies a maximum age limit for life jackets (e.g. 15 years). Our understanding currently is that Maritime NZ recommends life jackets are replaced after ten years, but there is no rule in place.	**No changes are proposed.** Maritime NZ does not support a rule setting an age limit on lifejackets, as the condition of a lifejacket depends on storage and history of use. The general requirement section of the rule proposes that life-saving appliance be maintained, serviced and tested, including monthly inspections to ensure that all life-saving appliances are complete and in good working order.

Support / did not support	What submitters said	Maritime NZ's response
Did not support	We leave the rating of the lifejacket to the owner.	**No changes are proposed.** Maritime NZ does not accept that the standards for lifejackets should be left to individual operators to decide. It would be expensive and inefficient for every operator to have to work out their own requirements. The outcome would be inconsistent and could harm persons relying on lifejackets in times of need. Comparable jurisdictions such as Australia and the United Kingdom specify standards for lifejackets.
Comment	Life jackets MUST also display the vessel name, otherwise how do you know which vessel it is off, is there a missing person when you have an empty life jacket…very important in an SAR operation.	**No changes are proposed.** Maritime NZ does not support the inclusion of a rule that would require lifejackets to be marked with the name of the parent vessel. A lifejacket may be in the water for a number of reasons and is more likely to be there because it has been lost overboard on its own than with someone in it. Search and rescue responses are generally triggered in response to an alert from a vessel that a person has gone overboard; or when an alarm is raised when someone does not return from a planned excursion. In addition, requiring lifejackets to be marked with the name of the parent vessel could add unnecessary complexity for operators who transfer lifejackets between multiple vessels they operate.

Lifejackets: Lifejackets and buoyant apparatus

Consultation proposals:

The Invitation to Comment, and draft Rule and Maritime Transport Instrument (MTI), cover the use of buoyancy apparatus in the following two situations:

1. **The Invitation to Comment issued with the draft rules included discussion on whether the rules should include a specific requirement for some passenger vessels operating in inshore limits to carry buoyant apparatus, for at least 30% of persons on board in addition to lifejacket requirements. This proposal would recognise that many vessels already carry carley floats, which would assist in a situation where people need to abandon ship quickly and don't have time to put on a lifejacket. This proposal was not included in the draft Rules or MTI, but was included in the Invitation to Comment as a way of seeking feedback on the proposal.**
2. **The draft MTI includes an option in clause 5.4(5) for the surveyor to determine whether lifejackets or personal floatation devices (PFDs) would not be required for every person on board if the circumstances listed in 5.4(5) are met, including that buoyant apparatus is available and would be at least as accessible and usable as lifejackets in an abandon-ship scenario, and the water temperature does not drop below 15 degrees.**

Support / did not support	What submitters said	Maritime NZ's response
Support	We generally support the requirement for buoyant apparatus for 30% of passengers on board a passenger vessel operating in inshore waters (similar to existing rules). Our vessels already carry an assortment of Carley floats to meet the existing rule.	**Response** Maritime NZ will update the draft rules to make it clear that a lifejacket or PFD is required for all persons on board, except in the following circumstances: - A wetsuit providing buoyancy of 53 Newtons or more is worn at all times during the voyage (refer MTI 5.4(4). - All requirements under MTI 5.4(5) are met. These are that buoyancy apparatus is available; the vessel is operating so close to shore that in an event of an emergency a person could disembark to shore; the master and crew have lifejackets; and the average mean water temperature does not go below 15 degrees Celsius.
Neutral	I can understand the reasoning behind this, but these flotation devises need to be well secured as passenger vessels operate at high speed and the question I have is, do the crew spend their time helping passenger into life jackets, or deploying these devises? They could be attached to the vessel with hydrostatic release mechanism, but then will not be deployed until the vessel has sunk. Do operators have the deck space for these devises? Some passengers will not have the strength to hold onto one of these without a lifejacket. Imagine a passenger in a wheelchair who is elderly entering the water without a life jacket trying to hold onto one of these. On a gusty day in the	

Support / did not support	What submitters said	Maritime NZ's response
	Auckland harbour the sea state can reach a meter very quickly, the only chance a passenger has it to be in a life jacket. What would a mum do that is travelling with 3 children who cannot swim and has not been helped by the crew to put life jackets on them as they are busy deploying these devises. She cannot hold onto all 3 of them in the water, this proposal is asking her to make a very difficult choice.	Maritime NZ does not propose to include a rule that would require vessels to carry buoyancy apparatus, for at least 30% on board, in addition to the requirement for lifejackets for all on board. **Comment** Submitters generally opposed options that would allow buoyant apparatus (e.g. Carley floats) to be substituted for lifejackets. This is consistent with the general support that all vessels should carry a lifejacket for all persons on board. The specific properties of a buoyant apparatus are set out in clause 5.4(6) of the draft MTI.
Did not support	Don't agree with this. If you're going to carry a buoyant apparatus it must be for 100%, otherwise who decides which of those bobbing in the freezing water meet the +30% criteria to be allowed aboard. Its not an either / or situation. 100% life jackets and 100% life raft coverage.	
Did not support	This is where the option of the Open Reversible Liferafts should be looked at. There is the possibility these rafts can have a 2-year service interval with approval from the manufacturer. The issue with buoyant apparatus is the survivors are still in the water (cold temperatures).	
Did not support	KARLY FLOATS. We need to move away from this type of apparatus. These were banned by MAST (Maritime and Safety Tasmania) many years ago.	
Did not support	Whose going to tell the person freezing and struggling to stay afloat in the water, sorry old chap, you don't meet the 30% criteria? If you have a buoyant apparatus (1 or more) it must cater for 100%	
Comment	What classifies as a buoyant apparatus, would open reversible liferafts be best option with an extended service?	

Lifejackets: Application of proposed new rules to existing vessels. Transition arrangements and costs for lifejacket requirements.

Consultation proposals:

The proposed new rules would require existing vessels to meet lifejacket rules when the new rules take effect. This would include vessels operating in enclosed water limits, for which carrying a lifejacket for all persons is currently optional.

Vessels that carry lifejackets that do not meet the proposed new performance standards would have two years from when the rules come into force to meet the new rules.

Topic	Support / did not support	What submitters said	Maritime NZ's response
All vessels would need to meet lifejacket rules from the date that the new rules take effect.	Support	Yes, soon as they are compliant. Then they are covered for any incident if one was to occur.	**Response** In response to consultation feedback, Maritime NZ is reviewing and aligning the transition timeframes for all proposals, and these will be consulted on as part of the public consultation on the Survey and Certification Rules. The transition timeframe to meet the proposed new lifejacket requirements will be included as part of this work. **Comment** Most submitters supported the proposal that existing vessels should need to carry a lifejacket for all persons on board from the date the rules take effect. This proposal appears to be uncontroversial, and anecdotal evidence suggests that many operators already meet the requirement. One submitter highlighted the importance of having time (they suggested two years) between when the rules are passed into law and the date they come into force. This would give operators time to budget for and comply with the new requirements.
	Support	We support lifejackets being required for all passengers onboard, and expect a 2 year time frame for vessels to meet this would be appropriate due to supply considerations. We already carry lifejackets for everybody on board.	
	Did not support	Are you sure you have reached out to all operators on this? Are you comfortable that your consultation process has captured all operators and they are aware of these changes, the effective date and what is being proposed here? Is there sufficient life jackets in the supply chain to facilitate this? I suggest it should be 2 years.	
A vessel operating in enclosed waters would need to carry a lifejacket for everyone on board from the date that the rules come into force.	Support	Plenty of retailers out there to purchase these from, so no excuses	
	Support	Support	
Should there be a longer transition period for certain lifejacket requirements?	Support	I am not across the number of life jackets that will need to be upgraded, what the stock levels are in NZ and what the lead time will be to secure these items. If the life jackets need to be imported, they are bulky, occupy a lot of space for shipping so air freighting will be very expensive. Suppliers in NZ will need to be made aware and gear up to sea freight these, which they will not do unless they have confirmed orders from customers.	**Comment** Most submitters opposed an option to have a longer a longer transition period for certain aspects of the lifejacket rules. For example, a vessel may carry lifejackets for all persons, but those lifejackets may not fully comply with the required standards or may not have the required newton rating.
	Support in part	Support, provided existing vessels are given 2 years notice of commencement date of the new rule.	
	Did not support	Strongly disagree	
	Did not support	Strongly disagree	

Topic	Support / did not support	What submitters said	Maritime NZ's response
	Did not support	2 years should be more than adequate. 5 years is too long, and vessel owners may take advantage to leave it until the last possible moment to upgrade their lifejackets to the new requirement.	
Costs of lifejacket proposals	Support	Yes to costs and yes to 'savings'…of lives.	**Comment** The costs for some operators could be considerable – as shown in one submission. That submitter did not oppose the changes, but noted that around two years would align with the rate at which 'wear and tear' means that they need to replace lifejackets
	Support	The proposed increase in buoyancy to 150N will necessitate the replacement of all current lifejackets, vests, and buoyancy aids. We are already in the process of reviewing these items based on the current standards in 40D and are awaiting quotes for replacements. We have now requested suppliers to provide pricing in line with the proposed 150N standard, rather than replacing these items with those meeting the existing standard.	
	Comment	Certain operators will have to purchase life jackets, find a place to store them, change the fire and safety plan etc. Life rafts will be at a cost, including mounting the brackets etc	

Liferafts: Requirements to carry a liferaft, and costs

Consultation proposals:

Whether a liferaft is required would depend on where it operates and what risk factors apply.

- **Coastal limits; offshore limits; and the unlimited area: All vessels would require a liferaft for all persons on board.**
- **Inshore limits (b) and inshore fishing limits: Vessels over 12m in length would require a liferaft. Vessel less than 12m would require a liferaft unless specified criteria apply.**
- **Inshore limits (a) and enclosed water limits: A liferaft would not be required unless specified high risk criteria apply.**

A surveyor would be able determine that a liferaft is not required to be carried on a vessel operating within enclosed water limits, inshore limits or inshore fishing limits. This decision would be based on a combination of factors including vessel length, operating limits, and operational factors including hours of operation, number of persons on board and communications arrangements.

Support / did not support	What submitters said	Maritime NZ's response
Support	*[Submitter operates an 11.9m inshore fishing vessel that would require a liferaft unless the specified exclusion apply; and an 18m inshore fishing vessel that would require a liferaft.]* Sounds good.	**Response** Maritime NZ will review the provisions which set out when a liferaft would be required, with a focus on: - Simplifying the risk-based approach and application of surveyor discretion. - Ensuring the requirements for vessels, operating within enclosed water limits, inshore limits and inshore fishing limits, are set at the right level. The proposed requirements are likely to reduce in some areas e.g. the requirement to have 200% liferaft capacity in some situations. - Ensuring that any changes to the Life-saving Appliance proposals align with the settings proposed for the rules for Fire Protection and Accommodation, Access, Escape, and Personal
Support	We generally support the approach to liferafts, particularly in reference to surveyor determination for enclosed waters vessels.	
Support	Cost of liferafts will have the most substantive impact of the proposal Tough! We replaced three aging lifeboats and davits with 6m SOLAS approved RIB rescue boats and davits across our fleet at $150,000 each. We could have kept the lifeboats but they were cumbersome, useless and not fit for purpose so the decision was made. Operators are just going to have to wear this expense for the sake of the safety of their passengers and crews.	

Support / did not support	What submitters said	Maritime NZ's response
Support in part	The MTI specifies high risk factors in section 7.5(8). The [sector organisation] supports (b) and (c) of this section with respect to ships operating south of 44 degrees south latitude and in water temperatures under 15 degrees centigrade. We do not support (a) for ships operating in the hours of darkness; or (d) ships carrying more than 38 persons.	Safety. These three sets of requirements must work together as they are designed to collectively ensure survival in an emergency. For example, a liferaft may provide a means to remain safe if the fire protection systems on a vessel are overwhelmed in a fire. **Comment** The proposed approach aligns requirements for life-saving appliances across the rules for passenger, non-passenger, fishing and sailing vessels, where practical. The approach is intended to provide a risk-based framework for when a liferaft would be required in enclosed, inshore and inshore fishing limits. The goal is to find the right balance between costs and risks. Maritime NZ expected that only a minority of small vessels (those with higher risks) would require a liferaft. The proposal to allow the surveyor to determine when a liferaft is not required had a mixed response, with some operators and sector groups concerned with what they experience as wide variation in the way that surveyors apply the current rules. The primary concern was about the cost of liferafts both the purchase costs and well as ongoing servicing costs. While Maritime NZ did not receive much written comment on the draft rule structure, feedback in the online sessions was critical of the complexity of the risk-based approach, which respondents noted was difficult to follow. Some operators of small vessels were also concerned that they would not be able to practically fit a liferaft on their small vessels.
Support in part	We would also support the carrying of a life-raft able to accommodate all persons on board if that is practical and appropriate to the nature of the vessel.	
Support in part	Basic personal equipment to preserve life should a vessel need to be abandoned is required on all vessels for example … a liferaft to accommodate all passengers.	
Did not support	*[Submitter operates an 18m inshore fishing vessel. Liferaft would be required].* Why does a fishing boat this size need a life raft but a charter vessel this size does not? No consistency.	
Did not support	All passenger vessels should carry a liferaft.	
Did not support	The [sector organisation] do not support the requirement for any vessel to carry certified liferafts in enclosed or inshore limits. With life raft costs ranging between $3,500 and $8,000, plus annual servicing fees, this is unreasonable. The issue is further exacerbated by the critical shortage of life raft service stations across New Zealand. The MTI rationalises this proposal by citing regional variations in water temperatures and limited access to emergency services. Yet, while we aim to harmonise rules across sectors, implementing a blanket regulation in this case seems not only impractical but also unfair to operators in low-risk areas.	
Did not support	Is Maritime trying to price fishers out of existence, I would like to have a life raft but the upkeep of life rafts is so much it's too expensive and then we wouldn't be able to keep up with our survey requirements, life jackets are the same and they will get in the way while working, will accidentally stab with iki spike and cost money.	
Comment	Life rafts will be at a cost, including mounting the brackets etc.	

Liferafts: Design / performance requirements

Consultation proposals:

Fishing vessels operating in offshore limits: Liferafts would need to meet SOLAS requirements including the standard of emergency pack inside.

Liferafts would need to be float-free unless certain criteria apply.

A liferaft carried on a vessel operating within coastal limits would be able to be an open reversible liferaft, subject to a risk assessment conducted by a surveyor.

Topic	Support / did not support	What submitters said	Maritime NZ's response
Fishing vessels operating in offshore limits	Comment	Should they not already be a SOLAS liferaft?	**No changes are proposed.** The requirement for fishing vessels operating in the offshore limits to meet SOLAS requirements for liferafts is not a change. The proposed new rules restate the current requirements.
Liferafts would need to be float-free unless certain criteria apply.	Support in part	Standardise across all vessels fitted with a liferaft that they must be fitted with a hydrostatic release, there are options of 2-3-4-year replacement dates. This is a very important point regarding a release unit, as many vessels have liferafts fitted without one and are fixed in a box type set up they class this as a float free arrangement!! I strongly disagree with a box type of arrangement as the liferaft is either not connected to the vessel or is solely tied to a strong point which in both cases affects the operation of the liferaft release.	**No changes are proposed.**
A liferaft carried on a vessel operating within coastal limits could be an open reversible liferaft.	Support	Move to open reversible liferafts, there are compact options now available.	**Response** Maritime NZ will review the proposal to allow open reversible liferafts out to coastal limits. The review will consider whether their use should be restricted to vessels operating closer to shore – for example enclosed water limits or restricted limits; what capacity they would need to accommodate; and the overall costs of an open liferaft compared to an enclosed liferaft. **Comment** This proposal seeks to balance the benefits of a vessel being required to carry liferafts with the costs of buying and servicing liferafts, particularly within coastal limits. In reconsidering this proposal, we need to determine if the right balance has been achieved. We acknowledge that the proposal is more permissive than current requirements for vessels operating within coastal limits. The response was mixed. Two submitters expressed concerns about the potential for cold and hypothermia associated with open reversible liferafts. New Zealand water is generally cold, and weather is often cool. Another submitter took the view that any liferaft would be better than none, but with conditions, including where the vessel is based and the equipment pack carried.
	Support in part	Any liferaft is better than none. But there would be some conditions – The area vessel is based (weather conditions/Sea states). Possible different equipment packs required	
	Did not support	I generally agree with Part 3H Life-saving appliances: Proposal summary, except: The proposal allows a liferaft carried on a vessel operating in enclosed water limits, inshore limits, inshore fishing limits and coastal limits to be an open reversible liferaft, subject to a risk assessment conducted by a surveyor. Have you ever been in a life raft and felt how bloody cold and exposed you are? All rafts must be enclosed to mitigate hypothermia and increase life expectancy.	
	Did not support	Apart from drowning the next risk is hypothermia. The provision to allow open reversible liferaft out to coastal limits seems to be based on help being immediately available. Even if after an abandon ship situation help may be close but the sea state may be such that retrieval of the persons in the raft is not possible. There may be people in the raft that are frail, have underlying health conditions or similar that means the effect of cold exposure has a greater impact on their capacity to generate heat and survive extended hours in cold wind with wet clothes onboard. Imagine going to the beach in Wellington on a windy day in winter, going into the sea fully dressed, then standing on the shore in wet clothes for 4 hours.	

Servicing of lifejackets and liferafts

Consultation proposal:

Servicing would need to be at intervals of 12 months, or such longer intervals as recommended by the manufacturer provided that the interval is not more than 30 months.

Support / did not support	What submitters said	Maritime NZ's response
Did not support	There needs to be more discussion on the "Flexibility for service intervals of liferafts and lifejackets" Some manufacturers do already offer an extended serviceable liferaft (S30) but this is only for SOLAS liferafts. Colleagues in Australia have made us aware of the Positive and Negatives of extended servicing for non-SOLAS liferafts. At present SOLAS Commercial lifejackets are a standard yearly service. ISO approved lifejackets requirements are yearly service for commercial use and 2 or 3 years for recreational use which is implemented by most manufacturers. This should stay as is. As there are multiple users of commercial lifejackets it would be dangerous to have extended servicing as some do not advise when they have accidently used. I disagree on point - "Requirements for approved servicing facilities will be separate from personnel expertise requirements. This will allow an approved facility to be utilised by multiple independent servicing personnel or companies." Under current MNZ audit you will be aware that stations hold and are audited by each manufacturer as their approved service station, so other personnel (unapproved) would be unlikely to service equipment at an unauthorised facility. (Eg: We couldn't go and service our brands elsewhere as their building has not been approved by our brand manufacturer) Facility must be approved by the manufacturer. With LIFEJACKETS we have already found inflatable lifejackets that have been serviced by company's NOT APPROVED BY MANUFACTURERS. For liferafts, if manufacturers agree to extended service intervals, extended servicing is obviously more economical for the Client. They save 2 x re-cert charges, vac bags etc. It's also more beneficial if the Client is a long distance from the Station or transport is involved. But it also causes accelerated service charges. Flares would need to be changed at every service & five-year items at every second service.	**Response** Maritime NZ will consider extending the service period for non-SOLAS liferafts to align with manufacturer recommendations as long as the recommended servicing interval does not exceed 36 months. Maritime NZ will review the draft rules to consider whether the new rules should include a requirement that persons servicing appliances within approved facilities must be approved by the manufacturer for those specific appliances. The review of the provisions which specify when a liferaft would be required will include the costs of servicing. **Comment** Maritime NZ notes the costs and logistical difficulties operators face with servicing, particularly for liferafts. Servicing provides assurance that the liferaft will inflate and work correctly when needed, and manufacturers will not stand behind their products if they are not periodically serviced. The proposed rules for liferafts seek to balance the costs of buying and servicing liferafts and the safety benefits they deliver. The proposed new rules change the rules for servicing to match manufacturer requirements. This is one way that costs can reduce. Servicing is part of the overall cost of carrying a liferaft, and is part of the consideration about when a liferaft should be required. Under the current Rules Part 42A, Maritime NZ approval of liferaft servicing stations requires approval of servicing personnel by the manufacturer of a liferaft. This reflects International Maritime Organisation (IMO) Resolution A.761(18) and is designed to maintain appropriate servicing standards. The downside is that the approach can restrict access to servicing if a manufacturer is no longer available, for example, because they have stopped trading. It was for these reasons that the proposed new rules did not carry across the current approach. However, the issues are complex and will need to be considered further before the proposal is finalised.
Did not support	We do not support the requirement for any vessel to carry certified liferafts in enclosed or inshore limits. With life raft costs ranging between $3,500 and $8,000, plus annual servicing fees, this is unreasonable. The issue is further exacerbated by the critical shortage of life raft service stations across New Zealand.	
Did not support	[Sector group] again wish to raise the issue as to the testing of life-rafts. The makers of the life rafts provide advice to purchasers based on their product guarantees. We see no justification for Maritime New Zealand requiring the rafts to be tested at any interval shorter than that recommended by the manufacturer.	
Did not support	*[The submitter operates a 18m inshore fishing vessel. A liferaft would be required under the proposed new rules.]* Why have life rafts serviced every year? Should be like a car warranty. If new then every 5 years, then after then every 3 etc.	

Rescue boats: Requirement to carry a rescue boat

Consultation proposals:

The proposed rules would require a rescue boat for the following vessels:

• a vessel of 35 metres or more that proceeds beyond inshore limits (a)

• a sailing vessel that proceeds beyond the offshore limit

• a vessel carrying more than 12 passengers that proceeds in the coastal or offshore limits

• a vessel of 15 metres or more carrying 99 or more passengers that proceeds within enclosed water limits or inshore limits

• a vessel of 24 metres or more in LLL carrying more than 36 passengers that proceeds within enclosed water limits or inshore limits.

For vessels operating within enclosed water limits, inshore limits, or inshore fishing limits a surveyor would be able to determine that a rescue boat is not required if they are satisfied that safe recovery of persons from the water can be achieved by alternative means, such as, that the parent vessel is able to rapidly change course to come alongside someone in the water and there is the ability to bring an unconscious person safely on board. A lifeboat or auxiliary craft would be able to be used instead of a rescue boat in certain circumstances. (Refer to rescue boat proposal 2 and 3 below).

Support / did not support	What submitters said	Maritime NZ's response
Did not support	We would not require low risk vessels to be required to carry a rescue vessel. By their very nature, low risk vessels have the capacity to retrieve any person falling overboard. A low risk vessel should be defined as one where all the persons on board are trained and competent in the use of firefighting and all other equipment on board and there is no substantial adverse risk to property or the environment.	**Response** Further analysis is required before the rules are finalised. Maritime NZ will review the proposed thresholds for requiring a rescue boat. In particular, the review will consider whether the proposed settings for passenger numbers and vessel length, and the operating limits within which alternatives to rescue boats can be used, are set at the right level. **General comment** The cost of a rescue boat and fitting launching and retrieval apparatus (e.g. a davit) to a vessel could cost an operator several tens of thousands of dollars, even with the proposals allowing a wider range of vessels to be used as rescue boats. Maritime NZ acknowledges that these are substantial costs. The proposed rules introduce alternative options to carrying rescue boat, for example using a 'man overboard net' or using an auxiliary craft that the vessel already carries. Also, the proposals would allow a variety of small locally made craft to be used as rescue boats. These would cost substantially less than boats that meet the non-SOLAS standard required under the current rules. Some submitters did not seem to be aware of these options. Other submitters appeared to be unaware of the current rules for rescue boats – it is possible that the vessels they are familiar with have been granted exemptions. **Passenger thresholds** The main impact of the proposed changes would be the changes to operating limits at which requirements apply, and changes to passenger thresholds within those limits. These proposals would impact around 39 existing passenger vessels. **Impacts of the proposed changes (summary)** The impact summary is based on the current rules, noting that some vessels have been granted exemptions from the current requirements to carry a rescue boat.
Did not support	1. Under the current regulations, rescue boats are not mandated for vessels operating within enclosed and inshore limits, and we see no reason to alter this. Additionally, we propose that vessels carrying fewer than 12 passengers within coastal limits should be exempt from the requirement to have rescue boats. 2. These vessels already carry liferafts sufficient for all persons on board, so there is no need for an extra rescue boat and launching equipment. This will decrease the number of exemption applications related to this piece of equipment. 3. To include a rescue boat and davit as prescribed in the regulations, into the design of a 24-metre vessel may restrict the design potential and significantly limit space (which is always at a premium on any vessel). 4. The additional weight of a rescue vessel and the launching davits that are prescribed, may also alter/effect the stability of vessels under 24 metres. In many cases, the cabin top needs to be strengthened beyond what is normally required, adding additional weight.	
Did not support	Launching, Recovery and embarkation: The sea state that one is likely to encounter in the Offshore areas of NZ would likely render launching and recovering a rescue boat virtually impossible from a 24-metre vessel. It would be too dangerous to attempt and possibly make it so dangerous as to potentially lead to an escalation of the event to a "serious injury" or "loss of life" event. A typical 5 – 6 metre swells with 40+ knots of wind over the top are not uncommon in the Southern Ocean but not dangerous for a 24-metre vessel. Attempting to launch and recover a rescue boat in these conditions, however, would escalate it off the scale.	

Support / did not support	What submitters said	Maritime NZ's response
Did not support	History of vessels transiting to the Sub Antarctic / Kermadec Islands. A review of the history of shipping to the Sub Antarctic and Kermadec Islands) helps us understand the risks. Most of the vessels visiting the Sub Antarctic Islands have all been around the 24–30 metre mark and between 80 – 120 Tonne nett weight, i.e. the Ranui, The Tagua, The Alert, The Acheron, Marine Countess, Sea watch, Tama, Pacific Ruby, Polaris and Evhoe. None of these vessels were or are required to carry a rescue boat. There has been one recorded incident when the Acheron was just north of Campbell Island some years ago and took a rogue wave over the top, flooding the vessel. The captain issued a mayday, and the passengers were all transferred to a nearby fishing vessel who shepherded the Acheron back to Dunedin. The rescue boat would not have been of any use in this incident.	**Sailing:** In theory, large sailing vessels operating in the inshore and coastal limits would be impacted because they carry passengers. The NZ commercial fleet only has one large sailing vessel (the Spirit of New Zealand) which already carries a rescue boat. **Fishing:** The changes would impact fishing vessels of 35 metres or more operating in the inshore fishing limits. No New Zealand fishing vessels would be impacted by this change, as all current fishing vessels of this size operate in the offshore limits and the unlimited area. There is a minor threshold change from 45 metres to 35 metres for fishing vessels operating in the offshore limits, but we expect no existing vessels would be impacted. **Non-passenger:** The changes would impact non-passenger vessels of 35 metres or more operating in the inshore limits. We expect no existing vessels would be impacted by the proposed change. **Passenger:** <u>Enclosed limits:</u> 28 passenger vessels operate in enclosed water limits and are 15 metres or more in length and carry 99 or more passengers. Of these, 14 are 24 metres or more in length and already require a lifeboat or rescue boat under the current rules. 14 vessels in this group do not currently require a rescue boat and could be impacted by the proposed changes. <u>Inshore limits</u>: 33 vessels are 15 metres or more in length, and carry 99 or more passengers in the inshore limits. 12 of these vessels are 24 metres or more in length and already require a lifeboat or rescue boat under the current rules. 21 vessels in this group do not currently require a rescue boat and could be impacted by the proposed changes. <u>Restricted coastal limits:</u> 7 passenger vessels operate in restricted coastal limits and carry 12 or more passengers. 3 of these vessels are 15 metres or more in length and carry more than 36 passengers, and already require a rescue boat. 4 vessels in this group do not currently require a rescue boat and could be impacted by the proposed changes. One is 29.9m; two are 18.1 m, and one is 13.7m. **Vessels in the unlimited area**
Did not support	The requirement that our vessel required a Rescue Boat is in my opinion both absurd and impossible. We carry 1 x 4.8 metre RIB on free fall davits on the transom (this is the work boat and used almost daily) and 1 x 3.4 metre inflatable boat which is launched with a hydraulic crane from the top deck. I believe this is totally adequate for all situations in unrestricted worldwide travel.	
Did not support	Man Overboard: Our 24-metre vessel can return and recover MOB significantly quicker and more efficiently and safer than stopping the vessel to launch a Rescue Boat. Also, the MOB coordinates (helmsman has hit the MOB button on the ships navigating system) will be readily accessible whereas the coordinates would need to be transferred to a handheld GPS to take into the Rescue Boat. This is potentially time consuming and transferring data also increases the potential for a mistake to be made. Our vessel has a swim platform which can be lowered to assist with recovery. Alternatively, we have a crane that could be used with a recovery sling.	
Did not support	Our certificate allows for a max of 16 people on board. We have 2 x 20-person life rafts on the vessel (one on Port side the other on Starboard Side). In the event of the vessel sinking and having to deploy the life rafts the chances are that everybody would be in one raft. In this situation we would also likely launch our 4.8 metre RIB (it is a gravity launch) which could be used for mustering life rafts. If we removed (or cut) two strops from our 3.4 metre zodiac it would float free from the cabin top in the event of the vessel sinking.	
Support	*[The respondent operates a fishing vessel of 11.9m – which would not require a rescue boat].* All good	

Support / did not support	What submitters said	Maritime NZ's response
Support	*[The respondent operates two inshore fishing vessels 11.9m and 18m. Neither would require a rescue boat]* Sounds good.	The proposed new rules would not change the current requirements, except regarding lifeboats. The current rules already require a passenger vessel operating in the offshore limits to carry a rescue boat. Other vessel types operating in the unlimited area require a rescue boat or a lifeboat. The current option of carrying a lifeboat instead of a rescue boat was removed from the proposed rules following advice from the sector that the lifeboat option is not being used and is considered impractical by sector operators. It is possible that submitters are not aware of the current rules, or that they are familiar with vessels that do not carry a rescue boat because they have been granted an exemption to the rules and assume that this reflects the rules. **Alternatives to rescue boats** Two submitters described arrangements on their vessels that appear to meet the proposals in the new rules to allow alternative arrangements to a rescue boat. One has auxiliary vessels (a 4.8m RIB and a 3.4m zodiac) that could be used as rescue boats. The other can turn rapidly and retrieve a person from the water. **Vessel length** The current rules apply different length thresholds – 15 metres and 24 metres for passenger vessels; 15 metres and 35 metres for non-passenger vessels; and 24 metres and 45 metres for fishing vessels. The proposed new rules use 35 metres for vessel that do not carry passengers, and 15 metres and 24 metres for passenger vessels.

Rescue boats: Rescue boat and retrieval of persons from the water

Consultation proposal:

Operators of a vessel operating within enclosed water limits, inshore limits, or inshore fishing limits would have the option of demonstrating the ability to recover persons from the water without needing a rescue boat. For example, they may be able to quickly turn their vessel and rescue a person from the water using a 'man overboard net'.

Support / did not support	What submitters said	Maritime NZ's response
Support	While no changes are proposed regarding the boats themselves, the requirement for a crew recovery system in man-overboard situations will affect some vessels. The cost of implementing a crew recovery system, including a davit or crew net, ranges from $4,000 to $15,000 NZD, depending on the vessel's height above water. This is seen as a positive safety measure, and we are in favour of implementing it.	**No changes are proposed.** This proposal is pragmatic and cost effective and appears to be supported. The vessels operated by the first submitter already carry a rescue boat and would not need to make any further changes.
Support	Any person who has gone overboard should be able to be retrieved or able to reboard the vessel if alone.	
Support	We support the allowance of a vessel being able to demonstrate it can recover a person from the water in a timely manner in place of carrying a rescue boat.	
Comment	Man Overboard recovery Systems (MOB) there are several options available internationally, which we have dealt with for options instead of rescue boats.	

Rescue boats: Rescue boat design standards and rescue boat launching equipment

Consultation proposals:

Other vessels, such as auxiliary craft, would be able to act as rescue boats. Manual launching for rescue boats would be allowed out to the coastal limits.

Support / did not support	What submitters said	Maritime NZ's response
Support	Provided they are unsinkable, powered, can be operated at speed, can carry enough pax (as well as coxswain, bowman etc) and ideally able to be righted if upturned.	**Response** Further analysis is required before the rules are finalised. Maritime NZ will consider whether the draft rules for rescue boat design need to be more specific regarding: - Approval of rescue boat launching equipment. - Conditions that apply to manual launching and retrieval. **Comment** Comments providing conditional support for allowing alternative design standards for rescue boats are consistent with the standards for rescue boats proposed in the draft Maritime Transport Instrument.
Support in part	On the acceptance that the launch system has been inspected / tested / approved by designer / engineer	
Support in part	It depends on the size, weight and shape of the vessel and will there be enough persons to be able to lift and manually launch it? If it could be launched without having to lift and throw it, yes, but then how do you recover it?	
Did not support	An aluminium dingy is not and could never ever be classed as a rescue boat. Even if not SOLAS, crafts to be designated as rescue boats must be unsinkable, powered, able to be righted, and carry the appropriate number of pax for its size etc	
Did not support	Yes, there needs to be a set service interval to ensure they are kept to a suitable standard. We have seen approved rescue boats in for annual service in terrible states as the vessel has also used them as a workboat. There needs to be a difference between a workboat and a rescue boat.	

Lifebuoys

Consultation proposal:

The proposed new rules aim to simplify the current rules by consolidating and harmonising different requirements across the fleet for different vessel types, length and operating limits.

Support / did not support	What submitters said	Maritime NZ's response
Support	And all life rings must have the vessels name displayed.	**Response** Maritime NZ proposes to retain the requirement for 4 lifebuoys to be carried on vessels that are 15 metres or more but less than 24 metres and that operate within enclosed water limits, inshore limits, or inshore fishing limit. However, we propose to extend a surveyor's discretion to reduce the number of lifebuoys required (MTI 4.6(4) to include vessels of 15 metres or more but less than 24 metres – if certain circumstances apply. **Comment** Submitters generally supported the proposed approach, which is intended to help the system to work more effectively in the long term by aligning requirements between vessel types to reduce unnecessary complexity. However, two submitters noted that the proposal would increase the requirements for lifebuoys for vessels which are 15 metres or more but less than 24 metres operating within enclosed water
Support	Yes, makes sense	
Support	Support	
Support in part	*[The respondent operates two inshore fishing vessels. An 11.9m inshore fishing vessel and an 18m inshore fishing vessel.]* This doesn't look like any benefit to my vessel [s?] but a simple requirement to meet	
Support	*[The respondent operates a fishing vessel of 11.9m]* Happy with that, already compliant.	
Support	Support, however, what was the justification for increasing the number of lifebuoys from 2 to 4 on vessels 15-24m in enclosed and inshore limits. Also, curious as to why 2 x lifebuoys required on a barge that carries no passengers? Refer 4.2(2).	
Support	We support the proposed approach to rules for lifebuoys and visual signals.	

Support / did not support	What submitters said	Maritime NZ's response
Did not support	Why don't you stick to one approved 2.5kg Lifebuoy, rated to two people?	limits, inshore limits, or inshore fishing limit, without a clear reason. The intent of setting the proposed lifebuoy number requirements was to ensure that lifebuoys are readily accessible in man overboard scenario. As accessibility to lifebuoys is dependent on the size and configuration of the vessel, the draft MTI provides surveyor discretion to increase or decrease (to a minimum of 2 lifebuoys) the requirements within prescribed circumstances. Under the current proposal, surveyor discretion to reduce the number of lifebuoys was limited to vessels less than 15 metres in length. As noted above, Maritime NZ is proposing to extend this surveyor's discretion to vessels less than 24 metres. In exercising this discretion, under the proposed rules a surveyor must ensure that there are sufficient numbers of lifebuoys to enable their rapid deployment. The suggestion to require lifebuoys to be marked is consistent with the requirements in the current rules. The deployment of a lifebuoy is often one of the first responses to a man-overboard incident, and being able to trace a lifebuoy back to its source would be valuable in some circumstances, to determine if there has been a safety related incident.
Did not support	*[Submitter operates an 18m inshore fishing vessel. It would need to carry 4 lifebuoys.]* Have 2 now, why double up?	
Did not support	On a dumb barge without railings or fittings where are these to be mounted? With the fire extinguisher? Delete	**No changes are proposed.** The proposed new rules would not change lifebuoy requirements for barges. Part 40C already requires a barge to carry two lifebuoys (refer Maritime Rule 40C.79). While a barge may not carry persons during a voyage there will be times when people are on the barge, e.g. when loading and unloading.

Visual signals

Consultation proposal: The proposed rules would harmonise visual signal requirements across vessel type. Vessels operating in the same area would have the same requirements.

Support / did not support	What submitters said	Maritime NZ's response
Support	*[The respondent operates two inshore fishing vessels 11.9m and 18m].* Happy to meet this requirement.	**No changes are proposed.** The overall proposal for visual signals is straightforward and appears to be uncontroversial. While the rules can specify the number and type of visual signals required, the shelf life of these appliances is outside the control of Maritime NZ. Maritime NZ does not currently support the use of LED flares. However, the design of the MTI means that it could be easily updated in the future. Maritime NZ will monitor any international changes in relation to the use of LED flares. Currently the Australian Maritime Safety Authority (AMSA) does not allow the use of electronic visual distress signals (EVDSs). AMSA notes that further testing of the efficacy of these devices is required and that ideally their effectiveness should be internationally recognised. In November 2025, the US Coast Guard (USCG) released a Directive that from 1 June 2026 the USCG cutters would use approved EVDSs.
Support	*[Submitter operates 11.9m inshore fishing vessel] Yes* all good	
Support in part	All vessels should carry both parachute and hand held flares. Orange smoke signals as well. LED red hand-held flares should also be allowed.	
Support	We support the proposed approach to rules for lifebuoys and visual signals.	
Support	Support	
Support	We support the proposed approach to rules for lifebuoys and visual signals.	
Support	Support	
Support	Yes, makes sense	
Support in part	*[The submitter operates a 18m inshore fishing vessel]* Should have longer shelf life, kept clean and dry.	

General emergency alarm and public address system; Line-throwing appliances; Marine evacuation system; SOP boats; Survival clothing

Topic	Support / did not support	What submitters said	Maritime NZ's response
Transition periods. **On commencement for line throwing appliances & survival clothing.**	Support in part	Support, provided existing vessels are given 2 years notice of commencement date of the new rule.	**Response** In response to consultation feedback on transitional periods, Maritime NZ is reviewing and aligning the transition timeframes for all proposals, and these will be consulted on as part of the public consultation on the Survey and Certification rules.
General emergency alarm and public address system;	Support	Support.	**No changes are proposed.** The proposal is straightforward and reflects the current rules. No other comments were received.
Line-throwing appliances A ship of 35 metres or more in LOA which proceeds beyond inshore limits or inshore fishing limits would need to carry a line-throwing appliance.	Did not support	Under the existing passenger regulations, this equipment is only required for vessels over 30 meters operating in offshore and unlimited areas. The new proposal states that all coastal vessels carry it. We do not support this additional expense and find no justification for the requirement.	Response Maritime NZ will consider whether existing vessels should be able to comply with the current rules – that is whether grandparenting should apply. This will be included as part of consultation on the draft Survey and Certification Rules. **Comment** The proposed rules would be a reduction in requirements for some vessels and an increase in requirements for others. Under the current rules, line throwing appliances are required for: - Passenger and non-passenger vessels of 30m or more operating within the offshore and coastal limits, and non-passenger vessels of less than 500 GT that undertake an international voyage. - Fishing vessels of 30m or more operating within the coastal and offshore limits and the unlimited area. - Sailing vessels of 30m or more that proceed beyond offshore limits. Line throwing requirements would reduce for passenger, non-passenger and fishing vessels operating in coastal limits or beyond, because the threshold would move from 30m to 35 metres. Requirements would increase for vessels of 35 metres or more allocated restricted coastal limits and sailing vessels of 35 metres or more operating in between restricted coastal limits and the unlimited area, because the rules do not currently set requirements for vessels operating in these limits.
Marine evacuation system	Comment	Clarify which vessels require one of these – unable to find in rule or MIT [sic]	**No changes are proposed.** A marine evacuation system is not required by the rules. The proposed rules and MTI specify requirements that apply if an operator chooses to have one.

Topic	Support / did not support	What submitters said	Maritime NZ's response
SOP vessels. Lifejackets and Liferafts. Requirements for vessels of 6m or less operating close to shore under safe operational plans are very similar to current requirements (noting these vessels generally do not require liferafts).	Comment	That's fine that they don't need a liferaft, but they SHOULD be wearing a lifejacket.	**No changes are proposed.** This is addressed in the proposed lifejacket rules.
Survival clothing The proposal would carry over the current requirements for immersion suits into the new rules.	Support	Support	**No changes are proposed.** The proposal is straightforward. No other comments were received.

Appendix 4: Anchors and Cables Rules and Maritime Transport Instrument: Detailed submissions and proposed responses

General approach to proposed new Anchors and Cables Rules

Support / did not support	What submitters said	Maritime NZ's response
Support	Four submitters simply noted that they support the proposals.	**Comment** The proposed rules give owner and operators the option of following classification society rules or the Anchors and Cables Maritime Rules. Appendix 1 of the MTI includes an EN calculation method for barges.
Comment	A sector group made the following comments: Barges need AMOC [alternative means of compliance] pathway. No need to state "windlass, capstans and winches". If relating to an anchor it is a windlass regardless of the configuration of machinery. Still leaves open scope of application when Class calculation is used. Redundant phrases due to poor wording / in concise clauses	

Rule design

Support / did not support	What submitters said	Maritime NZ's response
Support in part	We support the initiatives to relax the restrictions on anchors and cables but consider that for low risk vessels, discretion in the choice of materials and equipment should reside with the owner.	**No changes are proposed.** The policy intention was to allow greater flexibility in the selection of anchors, and Maritime NZ accepts that more work is required. (See comment below.) The proposed new rules do not use the language of “low risk”. However, the proposed new rules would not set many requirements for small vessels operating close to shore. Maritime NZ does not accept that the suggestion that the choice of anchors and cables materials and equipment “should reside with the owner.” It would be expensive and inefficient for every operator to have to work out their own requirements. A policy like this would lead to an inconsistent approach and could result in harm to the individual operator and other persons on their vessel.
Comment	Section 1 C1.1 General requirements for anchors and cables. This implies that the anchors will not drag. They do. Amend to “Anchors and cables fitted to a ship must be capable of holding the ship to their design specification when required.”	**Response** Maritime NZ will revise the draft wording of rule C1.1(2) to link performance to the intended design. **Comment** Rule C1.1(2) states: “Anchors and cables fitted to a ship must be capable of holding the ship when required.” While the expected performance of an anchor or cable is implicitly related to context, there is value in making this explicit in the rule.

Anchor cable. Fibre

Consultation proposals:

Fibre rope anchor cable: Tables in the Maritime Transport Instrument (MTI) are provided for Manila Rope, Polyester Rope, and Nylon Rope. Other rope may be used if it has a breaking load equivalent to the breaking load for the specified chain cable.

Support / did not support	What submitters said	Maritime NZ's response
Support in part	Consideration should be given to allow Ultra-high-molecular-weight polyethylene (UHMwPE; Umpy) anchor cables. We have noticed and supplied some UHMwPE (Umpy) lines to some NZ boats in lieu of wire. Umpy is now being commonly seen in anchor rodes, as it is OK when used with something to give elasticity. Don't know if you need to consider that alongside the tweaking to allow wire. We think in some places Umpy is OK but big ugly commercial fishing boats probably not so much. We think while there is a place for it in some specialist situations, the knowledge around it is still a little bit scatter gun to be able to say 'wire or Umpy'.	**No changes are proposed.** **Comment** Under the draft MTI, ultra-high-molecular-weight polyethylene rope would be allowed for vessels of less than 24 metres in length provided it has the same breaking load as the specified chain cable.

Anchor cable. Steel wire

Consultation proposals:

The proposed new rules would allow steel wire rope to be used as anchor cable with two conditions: A maximum equipment number (EN) of 500; and if the ordinary stockless weight of the cable's anchor is 130 kilograms or more, the cable must be load tested.

Support / did not support	What submitters said	Maritime NZ's response
Support	Sounds OK	**No changes are proposed.** Both support for and opposition to this proposal is noted. Steel wire anchor cable is recognised for use by the International Association of Classification Societies (IACS) and by classification societies recognised by the Director of Maritime NZ. Steel wire rope is allowed under the Australian National Standard for Commercial Vessel. It is currently used in New Zealand by large fishing vessels surveyed under classification society rules. Steel wire rope would be an option available to operators who wish to use it. The proposed new rules include conditions to address the potential downside of using steel wire rope. Maritime NZ considers that these factors mitigate the respondent's concerns.
Support	Support proposal	
Did not support	There is absolutely no condition where wire can be used in lieu of anchor chain cable. Wire provides piss poor holding in bad weather / high winds. You can't get a catenary due to weight difference compared to chain cable. Wire is also very prone to abrasion in fairleads and hawse pipes considerably weakening the strength of the cable. Using wire is just a space / weight saving solution, that's all, a compromise and is not an effective anchoring system. I've been on large ships with this system and refuse to anchor because the vessels swings around on it. I've lost an anchor because the wire was corroded inside (not visible by eye)	
Did not support	I do not agree with the conditions under which steel wire will be allowed to be used as anchor cable. The proposal allows the use of steel wire rope where the vessel has an EN less than 500, which equate to an anchor weight of around 1440kgs. However, there are Class approved installations where the anchor weight is around 3800kgs and it would be impossible to change to chain cable as a chain locker cannot be retrofitted to a ship.	**No changes are proposed.** The EN threshold of 500 for steel wire rope needs to be read with the Rule C2.1 Application of requirements for anchors and cables. This rule would give operators an option of following recognised classification society rules instead of the Maritime Rules. The EN threshold of 500 for steel wire rope is designed to ensure that where a heavy anchor is required (e.g. over 1,440 kg), the use of steel wire anchor cable would need to be certified by a classification society. Classification society rules would apply, and there would be no requirement to switch to chain cable. The respondent's vessels are already surveyed to classification society rules, and the proposed rules would not impact these vessels.

Support / did not support	What submitters said	Maritime NZ's response
Comment	Streel wire ropes. Should be thimbled or swaged to prevent damage and potentially breaking. At the other end a spelter socket should be used for the same reason.	**Response** Maritime NZ will revise the draft MTI clause 2.7(8) which requires steel wire rope to have thimbles fitted to each end – to add swaged and spelter sockets as options.
Comment	Marking of steel wire rope. Markings on tackle and gear overboard is impractical. It fades after 2 or 3 years. [Some other way of tracking this probably needed].	**No changes are proposed.** The draft MTI requires labels to be attached at the time of purchase.

Anchors and cables. Certification requirements

Consultation proposals:

Vessels of 24 metres or more in load line length. Testing and certification of new anchors and chain cables by a recognised classification society would be required. This is the same as the current rules. Grandparenting would apply to existing anchors and cables providing they remain in good working order, and the vessel has not changed its operation in a way that could invalidate the basis on which the anchors and cables were determined.

Vessels of less than 24 metres in length. A certificate issued by the manufacturer confirming steel quality and strength (proof load) would be required for new anchors of 75 kgs or more and chain cable of 14 mm or more in diameter. Grandparenting would apply as described above.

Support / did not support	What submitters said	Maritime NZ's response
Support	We support reducing certification requirements for vessels under 24m.	**No changes are proposed.** Anchors and anchor chain cables are safety-related equipment on a vessel that needs to work as intended when it is called upon. Certification of anchors and cables is universal for large ocean-going ships. Australia applies a 75 kgs threshold for certifying anchors. Cable must have a working strength greater than the holding power of the anchor to be used, and must be tested and certified. This broadly aligns with a chain cable of 14 mm in diameter. The United Kingdom leaves anchor and chain cable details to the 'certifying authority' (i.e. the surveyor). Most certifying authorities are classification societies and would require anchors and cables to be certified to their rules and International Association of Classification Societies (IACS) guidelines. The thresholds proposed in the draft rules try to balance the costs of compliance and the risks of failure. Analysis suggests that the level of assurance required under the current rules set is not necessary for vessels of less than 24 metres in length. Instead, the proposed new rules would require manufacturer certification for anchors of 75 kgs or more and anchor chain cables of 14mm in diameter or more. This is a reduction in requirements. The current rules set thresholds of 75 kgs and 12.5mm for when anchors and cables must be certified by a classification society. Maritime NZ considers that the proposed new rules would allow greater flexibility in the selection of anchor cable and reduce unnecessary certification costs. Most vessels in the fleet would benefit
Support	Certification requirements for vessels of less than 24 metres in length are not appropriate for vessels that seldom use their anchors.	
Support	Sounds ok	
Support	It's not hard to obtain a certificate of test from the suppliers for your anchors, chain/cable, wire or synthetic ropes, shackles etc. Easy enough to keep this paperwork safe and dry.	
Support	Support proposal	
Support	We have noticed an increase in chain failures over the last 18 or so months. By failures I mean they broke leaving the boats adrift. 5 instances with one winch/builder combination alone this year. We tested a few of the remains to find it failed at around 55% of what it should. Reputable manufactures should be able to provide real Test Certificates with traceability so when a length goes on to a NZ boat the end links can be matched to the Certificate. There is no reason MNZ can't ask for what is effectively an equivalent to a IACS Cert which is used the same way. Certificates must show the test procedure used to attest to its validity and have some unique number to be stamped on the end links. That effectively gives you the same info and tracking ability as an IACS Cert but without the growing time frames and cost to get one. This means suppliers can respond months faster than they currently can (11 months in a case recently) if a boat is in need. For a manufacturer this should make zero difference to them assuming they are reputable. For the NZ supplier this should not change bugger all or add any cost, besides the 5 minutes it takes to	

Support / did not support	What submitters said	Maritime NZ's response
	stamp the ends. For MNZ, or more importantly the crew, it give traceability and some assurance the Certificate is real and the testing has been done properly.	from the proposals. Around 93% of the fleet is less than 24 metres in length. Maritime NZ has been advised that manufacturers already provide the kind of documentation the new rules would require for vessels this size. The proposed new rules would introduce 'manufacturers certificates'. These are designed to provide assurance about cable performance without imposing the costs of certification by a classification society. The draft rules already specify the requirements suggested by the submitter. The proposed new rules do not use the language of "low risk". However, the proposed new rules would reduce requirements for many vessels of less than 24 metres. Maritime NZ does not accept the suggestion that the choice of anchors and cables materials and equipment "should reside with the owner." It would be expensive and inefficient for every operator to have to work out their own requirements. It could lead to an inconsistent approach and could result in harm to the individual operator and other persons on their vessel. No comparable jurisdictions apply this approach.
Support	I support the increase in chain size from 12mm to 14.5mm before requiring a Class Certificate.	
Support in part	We support the initiatives to relax the restrictions on anchors and cables but consider that for low risk vessels, discretion in the choice of materials and equipment should reside with the owner.	
Did not support	Certification requirements for anchors, chain cables and accessories are overkill. The maintenance schedule will look after issues here.	
Did not support	[MTI clause 3.3(2)(j)] 3.3.2.j Certificate of test requirements. The ore material used: the grade of zinc coating applied: the adhesion test results: the method of the breaking load testing: It is unlikely we will get this information above what the supplier would normally provide.	**Response** Maritime NZ will revise the draft MTI to remove zinc coating and ore details from MTI clause 3.3(2)(j). **Comment** Maritime NZ developed the draft rules in consultation with suppliers who provided copies of certificates provided by manufacturers containing the information set out in the MTI. However, we accept that zinc coating and ore details are not safety critical and should not be required.
Did not support	I find the requirement of Appendix very prescriptive and obtaining all details is unlikely to be practical. [Assumed to mean the requirements in the MTI]	
Did not support	MTI clause 3.5(2) Marking requirements for cables and accessories. Unrealistic for 14mm Chain. Delete	**No changes are proposed.** The proposed cable marking requirements are based on the International Association of Classification Societies (IACS) guideline) *W18 Anchor chain cables and accessories including chafing chain for emergency towing arrangements*. IACS Recommendation Number 10 *Chain Anchoring, Mooring and Towing Equipment* applies to anchoring equipment for ships having an equipment number (EN) from 50 to 205 which includes chain cable starting at 12.5 mm in diameter. The Lloyds Rules for the Manufacture, Testing and Certification of Materials reflect the IACS W18 marking requirements in rule 10.2.15. Chapter 10 of these Rules also starts at 12.5 mm chain cable.
Comment	For chain cable, I would suggest that the rule could introduce a physical test (to failure) as a direct alternative to manufacturer's certification. This is easily achieved in New Zealand with a number of testing establishments and will both widen the potential source and properly validate the cable strength.	**No changes are proposed.** Maritime NZ would be interested in pursuing this option if information about suitable test facilities comes to hand. However, testing chain cable does not appear to be as straightforward as suggested by the submitter. Maritime NZ looked for but did not locate NZ testing establishments that are certified to test anchors and chain cables. One supplier advised that they have a test rig, but to meet certification requirements the test rig would also need to be independently calibrated and certified by an accredited third party.
Comment	The requirement to use Certified anchors for ships over 24m would be more convenient if extended to 35m – on the bases that 24m will capture many vessels whilst 35m will limit the requirement to genuinely larger vessels.	**No changes are proposed.** The proposed threshold in the draft rules means that fewer vessels would require certification than is the case under the current rules. Less than 9% of the New Zealand commercial fleet is 24 metres or

Support / did not support	What submitters said	Maritime NZ's response
		more in length. 24 metres is a widely used threshold in both IMO and Class Society rules. A vessel of 24 metres is large enough to exert significant force on an anchor or cable.

Anchors. High holding power (HHP)and super high holding power (SHHP) anchors

Consultation proposal: High holding power (HHP)and super high holding power (SHHP) anchors: These would be allowed if they meet the weight requirements and are certified as described above.

Support / did not support	What submitters said	Maritime NZ's response
Support	I agree with the proposal to allow SHHP anchors if they have been approved by a recognised classification society or inspecting organisation. It takes into account the design of this equipment.	**Response** Maritime NZ will revise the draft rules to add a pathway for non-traditional anchors based on anchor holding power rather than weight. Maritime NZ will revise the draft rules to clarify when certification is required for non-traditional anchors. **Comment** The proposed new rules largely carry over the current tables specifying ordinary stockless anchors. The proposed approach to HHP and SHHP anchors follow the approach of the International Association of Classification Societies (IACS) and allow high holding power and super high holding power anchors if they meet specified minimum percentage of the weight specified in the MTI for an ordinary stockless anchor. The specified anchor weights in the tables work as a 'proxy' for holding power. This approach is well tested over time, is simple to use and makes the rules accessible for non-specialists. However, submitters have correctly pointed out that the draft rules and MTI do not provide a mechanism to substitute an ordinary stockless anchor for another design based on holding power (rather than weight). The rule reform is seeking to future-proof the rules and increase flexibility, and we agree that this should include making provision for new and lighter anchor designs. We note that: - Adding a pathway for non-traditional anchors based on holding power would require an expert to calculate the holding power required for a specific vessel. - Manufacturers of non-traditional anchors will need to be able to show through testing that their designs meets the required performance standards. Note that the proposed new rules do not require anchors to be made of steel. However, basing the anchor tables on weight does reflect the traditional focus on steel.
Support	Support	
Support	Super high holding power (SHHP) anchors should be the only anchors used.	
Support	OK	
Support	We support this proposal	
Support	Support proposal	
Support in part	With more and a growing number of weight sensitive vessels coming on line to not be able to use the best options available seems very short sighted and not future proofing. The interest in Alloy anchors is increasing fast as the better anchors today are all based on area not weight. An anchor can be made of Alloy as long as it is the same physical size/the same physical area as the Steel/Stainless version of it. Saying it like that ensures the key aspect of the designs, that being size/area remains the same as that's what does the work. Thinking about it there are only 5. Fortress, Guardian, Racer, Spade, Excel and the Racer. The first 3 are all Danforth patterns and pretty unique in their 3 respect rights i.e. near impossible to make a knock off of. The Spade and Excel (the 2 that lead the 2 design theories in play) are made in steel, stainless and alloy so the wording above is fine as there are steel ones to compare the alloy against. For manufacturers/suppliers it will make no difference. For MNZ it just gives more flexibility should it be needed and we'd argue with the push towards battery boats and other new technologies, watching displacement is going to become more important. We could also drop in here if you look at a lot of the newer low energy using craft they all tend to have fine bows, one thing that does not play well with lots of weight sitting on top of it.	
Did not support	Standard stockless anchors still the benchmark - No effort to modernise rule Could be interpreted all anchors other than standard stockless anchors need certification. - But anchors under 75 kg do not have certification. This rule cannot be complied with. (MTI 3.2) - circular refence, in concise wording, what is the intent?	
Did not support	Stockless anchors were introduced in the early 1800's to replace those with a cross bar (the stock) as used by Captain Cook. These have, in turn, been replaced with HHP type anchors first introduced in the 1930'S. Modern anchors are now almost exclusively HHP or SHHP type – stocked would only be used on historic	

Support / did not support	What submitters said	Maritime NZ's response
	vessels (probably for appearance and unlikely to be used) whilst stockless Non-HHP types are equally rare. It appears the MNZ Rule (and proposed update to the 40Series) and still stuck in the 1800's! (and I note a requirement to quote Stock weight – that is even earlier)	

Anchors. Single anchor in certain conditions

Consultation proposal:

The proposed new rules would allow passenger vessels of less than 24 metres to carry a single anchor, provided that it only operates between a fixed wharf, jetty, or berth and another fixed wharf, jetty, or berth as part of its normal operations.

Support / did not support	What submitters said	Maritime NZ's response
Support	Two anchors are generally required where a vessel will be at anchor for extended periods and there is a risk that a second anchor may be required. Vessels operating transits of short duration are very unlikely to require the use of an anchor, certainly very unlikely to require two.	**No changes are proposed.** Support for this proposal is mixed. The proposal to allow a single anchor in some circumstances would come with safeguards, and Maritime NZ considers that the proposal would strike a reasonable balance between costs and risks. Only a small number of passenger ferries meet the criteria for when a single anchor would be allowed. Maritime NZ has already issued exemptions allowing a single anchor to some of these vessels.
Support	We support this proposal for vessels that operate wharf to wharf within restricted limits.	
Support	Support proposal	
Did not support	By their very nature, passenger vessels carry any number of passengers and operate close to shore. The Interislander was bloody lucky not to have been blown onto a lee shore…almost certainly would have if she had both anchors hanging off steel wire hawes causing one or both to drag. Those harbour tugs couldn't pull a sailor off your granny under those conditions. Irrespective of size, if you're carrying passengers you should have two anchors…a) if the weather conditions dictate you need both, or b) one fails. The vessel safety / seaworthiness and thus the safety of the passengers is paramount. Cutting costs is arguably in contravention of the operators responsibilities under MOSS / MTOC / MTA	
Comment	Amendment required. Many ships operate with only 1 anchor. Suggest include text along the lines of "is in accordance with a classification society rule for single anchor and confirmed by a NZ recognised naval architect"	**No changes are proposed.** Under the current rules, most vessels require 2 anchors. Apart from the specific exemptions granted by the Director of Maritime MZ, it is not normal practice for a vessel to carry only one anchor.