

# Maritime Levy and Oil Pollution Levy

## Discussion Document

NOVEMBER 2025

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## Foreword

New Zealand's maritime sector plays a vital role in our economy, environment, and way of life.

From international cargo shipping and cruise, which keeps New Zealand connected for trade and tourism, to domestic operators and coastal cargo, the safety, sustainability, and efficiency of our maritime domain depend on a strong and responsive regulatory system.

Maritime NZ is responsible for delivering that system - and the Maritime Levy<sup>1</sup> and Oil Pollution Levy<sup>2</sup> are critical to funding it. Together, they support:

- the functions which set, and improve, the rules that govern safe, efficient, innovative, and effective, operation of the maritime sector
- influencing international regulatory settings to ensure New Zealand interests are managed in global shipping connection
- compliance with settings so people can have confidence in participation in the maritime sector, statutory outcomes are delivered, and there is a level playing field for those operating in it, through inspection, audit and investigation
- partnership work with the sector to deliver interventions that contribute to a safe, secure, clean and sustainable maritime sector. For example, interventions that: provide guidance and education so people to understand what they need to do; support a thriving maritime workforce; and which play a key role in ensuring the sector impacts and opportunities are clear in a range of government policies and processes
- entry, monitoring, and exit of people and operators in the system and ensuring that these processes are efficient, digitised and fit for purpose
- maritime safety infrastructure and services like lighthouses and aids to navigation
- Seafarer welfare services
- oil response readiness and response capabilities, kit and training.

As part of good regulatory practice, these levies are reviewed every three years. This consultation outlines three funding options for the next levy cycle, beginning 1 July 2027. Each option reflects a different balance of affordability, regulatory delivery, and long-term resilience.

This consultation is your opportunity to help shape the future of the maritime regulatory environment in New Zealand. We invite feedback from all levy payers and stakeholders to ensure the final recommendation reflects sector needs, economic realities, and our shared commitment to a safe, secure, clean, and sustainable maritime environment.

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<sup>1</sup> Maritime Levies Regulations 2016

<sup>2</sup> Maritime Transport (Oil Pollution Levies) Order 2016

## Executive Summary

Maritime NZ is undertaking its scheduled three-year review of the Maritime Levy and Oil Pollution Levy, which together fund nearly half of the organisation's operations. The Maritime Levy contributes \$39.4 million, or 37% of total funding, while the Oil Pollution Levy contributes \$8.3 million, or 8%. These levies are essential to maintaining a safe, clean, and sustainable maritime domain for New Zealand.

Any changes to levy rates would take effect from 1 July 2027. This consultation aims to provide early visibility of potential funding options and levy rates so that levy payers can plan ahead. In particular, we have endeavoured to give the cruise sector ideally 18-months lead in time so that it has the ability to build any potential adjustments into ticket prices.

In preparing this review, Maritime NZ has been mindful of the current fiscal environment and the cumulative cost pressures faced by the sector since COVID-19. Before initiating the review, as part of our ongoing drive for efficiency and changes to our operating model, we have achieved \$6.3 million in savings (16% of Maritime Levy-funded activity) by 1 July 2027. We are also not proposing an increase in activity or staffing. Finally, we have made efficiencies in Oil Pollution Levy delivery, and through these, and draw down of reserves, plan to address inflationary cost pressures within the current levy amount and are not proposing any change to the Oil Pollution levy.

While we have included in the options, an option which includes no increase to the Maritime Levy, we have significant concerns that this option will inhibit our ability to be an effective regulator and to deliver the progress and activity over the last few years we have worked in partnership with many in the sector on. Option 2 also has many similar impacts.

Across the options, we have:

- Prioritised delivery of core regulatory functions while maintaining sector-requested improvements from the 2024 levy review
- Avoided cross-subsidisation between funding sources and ensured compliance with section 51 of the Crown Entities Act to remain solvent
- Built in a mechanism to address over-recovery if cruise and cargo activity increase during the levy period

Three options are presented in this consultation, ranging from no levy increase to sustaining current activity. We welcome feedback from levy payers and stakeholders to help shape the final recommendation.

## How to make a submission

You can give us feedback on the options in this document via:

- online submission form at [www.maritimenz.govt.nz/funding](http://www.maritimenz.govt.nz/funding)
- e-mail to [funding.review@maritimenz.govt.nz](mailto:funding.review@maritimenz.govt.nz)
- ordinary post to, Funding Review, Maritime NZ, PO Box 25620, Wellington 6146

If you want clarification on any of the options, for the purpose of making a submission, please feel free to send your questions through to us by email at the address above.

We have sought to find the right balance between keeping the document to an approachable length and including enough detail to provide a clear understanding of the basis for the options, their benefits and their implications. Further information is available on our website [www.maritimenz.govt.nz/funding](http://www.maritimenz.govt.nz/funding).

The deadline for making a submission is **5pm Monday, 8 December 2025**.

*Note that if you are sending a submission by post, it needs to be postmarked on or before 8 December 2025.*

## Previous Levies Review and Progress

1. The previous Maritime and Oil Pollution Levies review 2024 (the Review) followed a comprehensive assessment of Maritime NZ's efficiency and effectiveness, carried out in collaboration with the sector. This review explored what a high-performing maritime regulator should look like, evaluated our current state, and identified areas for improvement—including capability, capacity, culture, systems, and processes.
2. Since then, Maritime NZ has continued to evolve its regulatory approach. We've been shifting towards being a risk-based regulator that focuses on preventing harm before it occurs. This means working proactively with the sector, rather than simply responding to incidents, and using a broader set of tools to support compliance and enforcement. We're also making it easier for people and businesses to engage with us - through delivery of digital services and by removing outdated or unnecessary rules and processes.
3. The sector highlighted some of these, and other specific areas, where they saw additional support and resources were needed. These priorities were reflected in the Review and as a result, there was strong support across the sector for the last Maritime Levy Review. An exception to this was the Oil Pollution Levy (OPL), where the Cruise sector and OMV New Zealand raised concerns about the scale of the OPL increase and the short lead-in time.
4. The Review also introduced two new Government priorities: implementing MARPOL Annex VI<sup>3</sup> and providing funding to support the welfare of international seafarers.
5. We have made good progress against the areas in the Review:

**Table 1 Progress against the Maritime and Oil Pollution Levies Review 2024**

Funding	Progress	Impact
<b>Sub-standard ships</b> \$1.9m per year	A dedicated Maritime Inspections team was established with expanded national coverage.	Improved safety in New Zealand waters by increasing inspections of high-risk vessels. More deficiencies are being identified and corrected and unsafe ships detained. This mitigates safety risks for those working with the vessels and reduces risk that vessels will have groundings or other significant events. The team also partnered with the Tokyo Memorandum of Understanding regulators to run targeted campaigns on key safety issues across the Asia-Pacific.
<b>Rules programme</b> \$1.0m per year	Two Regulatory Amendment Packages delivered annually, with two major reform projects underway.	Targeted rule changes are reducing compliance costs, removing operational barriers, and supporting innovation. Sector feedback indicates strong early support for the progress made in addressing regulatory barriers they have raised.
<b>Notifications and Enquiries, and</b>	Key notifications digitised, a dedicated team launched (NET), and a triage model with service levels introduced.	Notification processes have been streamlined and an afterhours triage model put in place, improving response times, allowing scenes to be released earlier, and ensuring serious incidents receive 24/7 attention. A new triage policy and the NET has seen more efficient closure of low risk notifications Stakeholders report clearer processes and more consistent communication around what is happening with their notifications, as well as it being easier to notify through the new digitised form

<sup>3</sup> MARPOL Annex VI is the part of the International Maritime Organization (IMO) Marine Pollution Convention that seeks to address the impact of air pollution from shipping activities on human health and environments in and around port communities. New Zealand acceded to Annex VI on 26 May 2022.

Funding	Progress	Impact
<b>Regulatory licencing</b> \$1.2m per year	Capacity increased following the levy review; system and process improvements are underway.	A multi-year programme is improving licensing rules, policies, processes and digitisation. Timeliness is improving despite rising application volumes. Once seafarer licensing is fully digitised in early 2026, interactions with Maritime NZ will be faster and more efficient, reducing delays for individuals and businesses. Work has also begun on resolving complex operator issues.
<b>Third party oversight</b> \$0.8m per year	A new four-person team was established with a refreshed oversight framework.	Oversight of surveyors, recognised organisations, and training providers, is improving. Clearer expectations and performance monitoring will raise standards, support third parties, and ensure safer operations.
<b>Seafarer Welfare</b> \$1.5m per year	The NZ Seafarer Welfare Council was established, and grants were distributed to welfare providers.	Over 2024/25 28,500 seafarers received support through centre visits, improving crew wellbeing, safety, and connection while in port.
<b>MARPOL Annex VI</b> \$1.8m per year	MARPOL Annex VI was implemented to reduce air pollution from ships.	New Zealand's maritime emissions standards were strengthened through updated guidance, fuel testing with MBIE, and active participation in international negotiations (IMO MEPC2).
<b>Oil Pollution</b> \$0.8m per year	All regional councils completed two oil spill exercises; national and regional equipment stockpiles maintained.	National readiness and response capability for oil spills has been significantly strengthened.

6. In addition to the work outlined above, we have been embedding our new regulatory approach. Stakeholders have expressed strong support for our more balanced model—one that has increased proactive partnership and harm prevention, while ensuring there are a wide range of tools for correcting behaviour where appropriate, reserving enforcement for serious breaches and accountability measures.
7. The model is building trust with the sector, has encouraged voluntary compliance, and supported safer maritime practices. Some examples of our proactive work include the development of a new technologies pipeline, a workforce group to support fit for purpose training and career pathways, a new Fishers Health and Safety Leadership Group, and work to support the Cruise sector. In relation to our responsive work we have put in place new corrective tools, like voluntary agreements, which involve us working with operators who recognise when something goes wrong and are keen to correct the situation without using formal regulatory tools.

## The outlook over the next three-year levy cycle

8. Global economic uncertainty remains a key factor. While strong export growth and a partial recovery in imports are expected, levy revenue from international cargo is likely to stay relatively stable given the way in which levies are charged.
9. While cruise visits decreased over the last two years by 37% (see paragraph 23 below), many passengers still see New Zealand as an attractive cruise destination. Government initiatives—such as clarifying the future of cruise operations in Milford Sound, improving biofouling management, and providing greater transparency around costs—are expected to support cruise sector recovery. However, we recognise that much of the work is at an early stage and the impact of these initiatives and cruise visit recovery is difficult to predict.

10. We've also considered the possibility of further declines in cruise port visits from the current forecast of approximately 600 port visits in 2025/26. However, at this stage we believe that the actions taken by Ministers and industry will be enough to stabilise visit numbers and have not modelled further decreases.

## The Oil Pollution Levy Review

11. The Oil Pollution Levy (OPL) has experienced some levy revenue shortfall from a reduction in cruise visits but is holding up well. Three key factors have contributed to the fund's resilience:
- **Higher-than-expected oil import volumes**, which have exceeded forecasts. We now anticipate a more gradual decline in oil volumes than previously estimated.
  - **Strong cost control** by Maritime NZ across both operational and capital spending and targeted efficiencies and improvements in delivery.
  - **Healthy Reserves** in 2024/25, support for the Manawanui response, funded by Government, reduced our ability to undertake training activity and other activity, allowing the Oil Pollution Fund (OPF) to deliver a surplus of \$970,000.
12. As a result, OPF reserves have grown to nearly \$6 million by the end of 2024/25—well above the minimum of \$2 million required in case of an event and the \$1m required to deal with other operational levy fluctuations.
13. Given the current reserve levels and the savings achieved, we believe the OPL can be sustained through the upcoming three-year levy cycle without requiring a formal review at this time. We propose a phased drawdown of reserves - \$0.5 million per year - to maintain capability and continue delivering core oil pollution response activities in partnership with others. This approach avoids increasing costs for the sector. In contrast, the Maritime Levy is under significant pressure and does not have comparable reserves to draw on.
14. Maritime NZ will continue to work closely with the Oil Pollution Advisory Committee throughout the levy cycle to monitor performance and manage any emerging risks.

## The Maritime Levy Review

### How the Maritime Levy works

15. Maritime New Zealand's authority to charge levies is established under the *Maritime Transport Act 1994*, which enables the organisation to recover the costs of delivering regulatory, safety, and infrastructure services across the maritime sector. These services—such as inspections, investigations, navigational aids, rules, and international obligations (see also functions as outlined in the foreword)—are considered club goods: they benefit all commercial operators within the systemic. Because the sector creates the risks and collectively relies on a safe and well-regulated operating environment, it is appropriate that costs are shared through levies. This approach ensures fairness, sustainability, and alignment with the principles of regulatory stewardship and cost recovery.
16. The Maritime Levy is designed to fairly distribute the cost of regulating the maritime system across those who benefit from it, consistent with the OAG's principle of *equity*. It is not tied to individual services, but instead funds system-wide functions that support collective safety and resilience. Levies are charged to **all** commercial maritime operators and visiting foreign

vessels, based on factors such as vessel characteristics<sup>4</sup>. Contributions are weighted by the level of risk each operator presents—some pay more, others less—reflecting the *efficiency* principle by aligning charges with the drivers of regulatory effort. In line with *transparency* and *accountability*, the basis for levy calculations is publicly available, and rates are reviewed periodically to ensure they remain appropriate. It is important to note that while vessel volumes may fluctuate, the core costs of maintaining the regulatory system remain relatively stable. This means a reduction in activity does not necessarily result in lower levy rates, as the system must continue to operate effectively regardless of throughput.

17. Foreign vessels are charged differently to domestic vessels. The per-port-visit charge for foreign vessels reflects the fact that they are not part of New Zealand's permanent domestic maritime fleet and are only present for a limited time. An annual levy is more appropriate for domestic vessels, which operate within New Zealand waters on a consistent basis throughout the year.
18. The Maritime Levy is currently being reviewed in line with the recommended three-year cycle outlined in Treasury's 2017 guidelines<sup>5</sup>. The last review came into effect in 1 July 2024. This periodic review ensures levy settings remain fair, transparent, and responsive to sector needs. Rates are prescribed in Schedule 2<sup>6</sup> of the Maritime Levies Regulations 2016, with detailed information—including how rates are calculated—available on the Maritime NZ website<sup>7</sup>.
19. Cruise and cargo operators are impacted by a range of user charges, including both levies and fees. The Government is undertaking work to better understand system-wide cost pressures, which will support decision making and improved transparency for the sector.

## What the Maritime Levy funds

20. The Maritime Levy funds a broad range of essential regulatory, safety, and infrastructure functions that underpin New Zealand's maritime system. It supports audits, inspections, investigations, and corrective and enforcement activities, including prosecutions. The levy also enables Maritime NZ to meet international obligations through port state control and engagement and influence of international conventions. Safety Infrastructure and services such as coastal navigation aids are maintained through levy funding, alongside seafarer welfare services. Our work partnering with the sector through harm prevention programmes, supports rule development and changes, education initiatives and supports a safe, clean, sustainable and thriving maritime sector. We also provide notification and licensing functions. These functions are not tied to individual service use; rather, the levy ensures a resilient, responsive, and well-regulated maritime domain for all commercial operators.

## Main cost drivers

21. In 2025/26 we forecast the related maritime levy expenditure to be approximately \$42 million. The main cost drivers are largely fixed, meaning they don't scale down proportionally with activity. An estimated breakdown of this expenditure is 60% personnel and 40% other

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<sup>4</sup> The three factors used to calculate the levy payment for a vessel category are deadweight tonnage, passenger capacity, and either overall length or gross tonnage depending on vessel category.

<sup>5</sup> [Guidelines for setting charges in the public sector April 2017](#) – page 36 Triggering a review. “*Good practice is for regimes to be reviewed at a minimum of every three years.*”.<sup>9</sup>

<sup>6</sup> Public consultation and approval from the Minister of Transport and the Governor-General is required to change the Schedule.

<sup>7</sup> <https://www.maritimenz.govt.nz/about-us/our-funding/the-maritime-levy/>

operating. Other operating includes grants paid for seafarer welfare, third party contracts to maintain safety infrastructure and services, fuel testing (for MARPOL Annex VI), including overheads contribution for information technology, telecommunications, and vehicle and property leases.

## **Levy revenue shortfall and savings**

22. The modelling for the previous levy review was based on assumptions provided by Treasury, and other economic forecasts—covering cargo and oil volumes, as well as international cruise activity predictions.
23. However, changing economic conditions have slowed import growth. In the cruise sector, the sector has said uncertainty around biofouling regulations, access to Milford Sound, and rising regulatory and port costs (including the time needed to factor these into ticket pricing) has led to a significant drop in cruise ship visits—down approximately 37% between 2023/24 and 2025/26. This decline is occurring despite cruise growth in other parts of the world.
24. As a result, Maritime NZ has faced a forecasted levy revenue shortfall of \$6.3 million in 2024/25 and faces increasing shortfalls of \$8 million in 2025/26 (16.9%) and \$9.8 million in 2026/27 (20%).
25. To manage the shortfall, Maritime NZ has continued to implement savings and efficiencies identified in its operating review including:
  - Reorganisation and phasing recruitment to improve delivery and reduce staff costs and keeping remuneration increases at CPI or below as expected by the Public Service Commission (\$2.7m)
  - Digitising internal and external processes to boost productivity and reduce expenses (\$0.4m)
  - Consolidating property in Wellington and lowering costs in regional offices by partnering with other government agencies (\$0.3m)
  - Strictly prioritising travel while maintaining necessary regulatory delivery (\$0.3m)
  - Reducing reliance on contractors and consultants to 7.7% of workforce costs in 2024/25, 5% in 2025/26. Contractors are focussed largely on work on digitising of activity (\$1.4m)
  - Delivering frontline training more efficiently (\$0.4m)
26. These efforts have resulted in savings of \$5.5 million in 2025/26, rising to \$6.3 million in 2026/27—equivalent to around 16% of the Maritime Levy.
27. Maritime NZ has used these savings, along with Maritime Levy reserves, to offset the revenue shortfall.
28. However, by 2027/28 when the next levy review period is due to start, reserves will fall below the level required to meet the going concern solvency test under section 51 of the Crown Entities Act, meaning we do not have sufficient reserves left to cover shortfalls.
29. Despite these financial pressures, Maritime NZ has remained committed to delivering on the expectations and commitments set out in the last funding review, and to meeting the sector's broader expectations of us as a regulator.

## The role of reserves

30. Forecasting levy revenue over a three-year period is challenging. Modelling begins well before the levy takes effect, and unexpected events—such as biofouling impacts, cruise sector costs, or legal proceedings—can disrupt projections. Reserves are essential to absorb these shocks and, alongside savings, have, and will, help Maritime NZ manage the shortfall during the current levy cycle (1 July 2024 to 1 July 2027).
31. Our current level of reserves complies with the Crown Entities Act, which requires Maritime NZ to remain solvent. Our Treasury, Funding and Reserves Policy set a minimum cash reserve of approximately \$5 million, along with a current ratio (current assets to liabilities) of at least 1. These reserves are vital to meet working capital needs—not just across the year, but within any given month.
32. Revenue from third parties is often irregular, influenced by varying payment practices and financial capacity. In contrast, our outgoing payments—such as payroll and supplier costs—are substantial and unevenly timed. The \$5 million reserve acts as a financial buffer, allowing us to meet obligations even when incoming payments are delayed or staggered.

## Inflationary pressures

33. Over the next three-year levy period, Maritime NZ will also face inflation-related cost increases. These have been estimated using projected CPI figures, with adjustments where more specific data is available on real inflationary costs. For example:
  - Staff costs, travel, software, insurance, and petrol have been estimated at a CPI of 2%
  - Other contracts—such as software, maritime safety services, property, and leases—are expected to rise above CPI, based on contractual terms and market data

This results in a combined inflationary adjustment of approximately **2.5%**.

34. In total, inflation is expected to add **\$990,000** to Maritime Levy-funded costs in the 2026/27 financial year.

## The funding challenge

35. Maritime NZ is committed to maintaining the \$6.3 million in annual savings already achieved – equivalent to 16% of operating costs.
36. However, by the 2027/28 financial year—when the next scheduled levy review begins—Maritime NZ will face a \$3.1 million shortfall. Until now, this gap has been covered by reserves, but those reserves will reach their minimum threshold and can no longer be used.
37. Given the levy shortfall, and inflationary pressures, without levy adjustment Maritime NZ will face significant reductions in staffing and service delivery (another 20% of Maritime levy activity on top of the 16% already made), reversal of progress made and sought, by stakeholders and non-compliance with the Crown Entities Act solvency requirements.
38. If Maritime NZ were to just maintain current activities and progress, the combined levy shortfall is outlined in Table 2. This assumes 600 cruise ship visits per annum, and a flatline in relation to international cargo, with 2.5% inflationary cost pressures over the three-year period.

**Table 2: Forecast deficit over the levy period**

	2027/28	2028/29	2029/30
Deficit	-\$4.2m	-\$5.2m	-\$6.4m
% Expenditure	-9.6%	-11.8%	-13.9%

## Options

39. Three options have been modelled, ranging from no levy increase to sustaining current activity.

**Table 3: Table of Options assuming current Cruise and Cargo volumes**

Option	Option description	Additional revenue required	% increase
Option 1	Reduction of services and activities: No levy increase		
Option 2	Adjustment to address inflation and fund redundancies	\$1m (Year 2 and 3) +\$1.5m (Year 1)	2.5% (Year 2 and 3) 6.35% (Year 1)
Option 3	Sustain services: Adjustment to address inflation and revenue shortfall	\$5.2m	13.2%

### Option One: No increase to the Maritime Levy

40. Under this option, the Maritime Levy remains unchanged over the next three-year cycle.

41. Maritime NZ has already made significant savings and reshaped its operating model to improve efficiency. However, we have now reached the point where further savings would require substantial reductions in staffing and core regulatory services—undoing progress made in recent years.

42. To deliver Option 1, we would need to reduce funding for Maritime Levy activities by a quarter. This would involve a total reduction of approximately 35 roles. This is on top of reductions and savings made over the last two years (which makes it a 36% reduction in activity). Implementing these changes would require early certainty—ideally by early 2026—to allow time for planning, consultation, and to manage redundancy costs within limited reserve levels.

43. This option assumes conservative revenue forecasts: Cruise activity remains at 600 port visits per year, and Cargo volumes remain flat.

44. While there is potential for recovery in both areas, the timing and scale are uncertain. Without sufficient reserves to absorb fluctuations, we must plan based on the most cautious scenario. If activity does increase, we may be able to rehire, but this would come with additional costs and delays due to recruitment and training—creating inefficiencies for both Maritime NZ and levy payers.

45. We have retained field-based roles such as maritime officers and inspectors, given they provide our footprint on the ground and given increasing concerns around sub-standard vessels. We have also avoided cuts to small, critical teams—such as notifications and enquiries, and third-party oversight—where reductions would compromise the ability to deliver the function entirely.

46. The following section outlines the areas where reductions would occur under Option 1, including the approximate scale of change and expected impacts.

**Table 4: Option 1 proposed reductions and their impacts**

Category	Approx FTE and Savings	Impacts on Outputs and Service Levels
<p><b>Corporate Services; and</b></p> <p><b>Research, Analytics and Intelligence</b></p>	<ul style="list-style-type: none"> <li>• 12-15 FTE</li> <li>• <b>29% reduction</b> in ML FTEs activity in this area</li> </ul>	<p><b>Context:</b></p> <ul style="list-style-type: none"> <li>• Maritime NZ has overhead functions in many places which are one or two people deep.</li> <li>• Overheads are already efficient by public or private sector standards at 26%.</li> <li>• Corporate business partners are 1 for over 100FTE (usually between 1.2 to 1.5 per FTE in most medium to large businesses).</li> <li>• The overhead functions are non-discretionary to run our business and meet public sector accountability requirements.</li> <li>• People in many of these areas are already stretched.</li> <li>• Our regulatory approach is based on prioritisation of activity (audits, inspections education, guidance and rules reform, etc) to where the greatest harm is and where we can make the biggest impact. This requires data, evidence and insights.</li> </ul> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• Creates risks for an organisation which already has efficient overheads, as it creates “over starvation” of critical corporate functions which drive performance and efficiency. For example, risks quality of financial management, information services, performance and risk management, people and organisational performance management. This will exhibit itself in potential lapse of public sector accountability timelines and expectations, and poorer people, risk and financial management.</li> <li>• It will impede progress on critical digitisation work, which will mean efficiency and quality improvements for those regulated parties interacting with us, are not realised over the short to medium term. In particular, it will result in delays in the digitisation of operator certification (a key pain point for operators), and the implementation of MyMNZ (the online portal for those interacting with Maritime NZ which would ensure all interactions and information is in one place making it easier to transact digitally).</li> <li>• Decreasing resource in this area risks that our activity is not prioritised where it can make the most impact, and that activity is not monitored and evaluated to demonstrate whether interventions are successful in delivering outcomes or need to be changed. Activity is also less coordinated and disciplined and linkages not made. This will particularly impact commercial international and domestic maritime operators and our work with them in harm prevention programmes below.</li> </ul>
<p><b>Engagement and Harm Prevention Programmes</b></p>	<ul style="list-style-type: none"> <li>• 4 FTE</li> <li>• <b>67% reduction</b> in ML FTEs/activity in this area</li> </ul>	<p><b>Context:</b></p> <ul style="list-style-type: none"> <li>• Our Regulatory Approach is based on getting a better balance between reactive and proactive work and partnering with the sector on our harm prevention programmes to deliver interventions that address harm before it happens.</li> <li>• We also engage with the sector to understand issues and context to support maritime sector issues more broadly across Government.</li> <li>• Our partnership with the sector results in the sharing of data and insight, buy-in, and more effective implementation of interventions.</li> </ul>

Category	Approx FTE and Savings	Impacts on Outputs and Service Levels
		<ul style="list-style-type: none"> <li>• It also creates more trusted relationships with the Maritime industry and better delivery of outcomes.</li> </ul> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• Removal of these 4 roles will significantly impact our ability to actively work with, engage, and deliver proactive interventions for international shipping, cruise, fishing, and other domestic operators. It will impact on our sector leadership role and support for working groups in relation to these operators, which are needed to deliver our safe, secure, clean and sustainable outcomes.</li> <li>• Many in the sector have invested significant time and effort into these programmes and initiatives and if they are curtailed it will result in criticism particularly around sunk cost and effort and lack of follow through.</li> <li>• We are also likely to see progress being made reversed and lose mandate with operators in this part of the maritime sector, becoming seen again as an ad hoc and reactive regulator.</li> </ul>
<b>Technical Advice</b>	<ul style="list-style-type: none"> <li>• 3 FTE</li> <li>• <b>19% reduction</b> in ML FTEs/activity in this area</li> </ul>	<p><b>Context:</b></p> <ul style="list-style-type: none"> <li>• Provide high quality technical advice to key internal stakeholders regarding international, domestic, maritime, environmental, and port and flag state control matters, and provide support to surveyors.</li> <li>• Some in the sector believe we do not have enough maritime technical support currently.</li> </ul> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• Reduced quality of rules and decision-making due to a reduction in technical expertise.</li> <li>• Fewer specialists to engage at IMO to influence international settings.</li> <li>• Critical projects will progress slower—such as low emissions and new and emerging technology.</li> </ul>
<b>Regulatory Reform</b>	<ul style="list-style-type: none"> <li>• 4 FTEs</li> <li>• <b>29% reduction</b> in ML FTEs/activity in this area</li> </ul>	<p><b>Context:</b></p> <ul style="list-style-type: none"> <li>• In the last levy review an additional 5 FTE was provided to meet the sector desire to more quickly amend Rules which impeded productivity (i.e. created unnecessary pain points and cost or were no longer fit for purpose) and/or did not enable innovation or green fuels.</li> <li>• As part of Crown savings of 6.5% we had to give up 2 FTE working on Rules given there was limited other discretionary funding within our Crown funding and a small amount of Crown funding went to rules.</li> </ul> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• With removal of these 4 FTE, and the 2 FTE from Crown Savings, we will go backwards to less resource than before the last levy review on regulatory reform.</li> <li>• The Rules programme will be halved and impacting work in areas like workforce and low carbon technologies. This will mean that we are much slower to enable innovation and address Rules which are out of date, not fit for purpose, and create cost.</li> <li>• Less capacity to influence and provide advice on maritime issues, as well as regulatory changes led by other agencies that impact the sector, for example, low carbon issues which intersect between land and maritime, supply chains, port efficiency, biofouling impacts, health and safety reform etc.</li> </ul>

Category	Approx FTE and Savings	Impacts on Outputs and Service Levels
<b>Legal and Investigations</b>	<ul style="list-style-type: none"> <li>• 4 FTE</li> <li>• <b>22% reduction</b> in ML FTEs/ activity in this area</li> </ul>	<p><b>Context:</b></p> <ul style="list-style-type: none"> <li>• Our Regulatory Approach is focussed on addressing serious harm. Investigators are only used where there has been an incident involving serious harm or likelihood of serious harm (e.g. a death or permanent disability).</li> <li>• Prosecutions only occur where there was a serious harm or likelihood of serious harm, and other criteria are met like whether the behaviour was wilful reckless, or negligent, taking into account compliance history, and public interest.</li> </ul> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• Our investigations and legal team are already at capacity and struggling with workload. Reductions will mean some significant maritime events are not investigated, and even where high thresholds are met, not prosecuted. This impacts on regulatory incentives, outcomes, and heightens risk of regulatory failure.</li> <li>• Reduced ability to respond to notifications where there are insufficient investigators able to respond to serious events and hold the scene, this leads to disruption of maritime activity and costs for operators and ports.</li> <li>• Loss of confidence in the regulator and regulatory regime if some serious offences result in no action.</li> </ul>
<b>Certification and Licensing</b>	<ul style="list-style-type: none"> <li>• 6 FTE</li> <li>• <b>18% reduction</b> in ML FTEs/ activity in this area</li> </ul>	<p><b>Context:</b></p> <ul style="list-style-type: none"> <li>• We are currently digitising seafarer certification processes, and which when complete we will have reduced administration and workflow needs. However, some of the resource funding freed up from this work we would then use to provide support to digitising operator processes and certification advice and decision-making to also speed up timeliness and quality.</li> </ul> <p><b>Impact:</b></p> <ul style="list-style-type: none"> <li>• While many of the improvements in seafarer certification will be complete by 1 July 2027, reductions in this area, combined with those listed above in corporate services Information Services and Delivery, regulatory reform and engagement and harm prevention programmes will slow down our work on improving certification improvements.</li> <li>• This will mean we do not achieve performance expectation improvements in operator licensing times, impacting on efficient industry operation and creating costs for operators.</li> <li>• It would also undermine industry confidence that Maritime NZ is committed to improving its performance. In some cases, it may affect choice of operators flagging in New Zealand, resulting in operators operating around our coast on less robust flags, less regulatory tools to manage issues, and poorer safety outcomes</li> </ul>

47. Beyond these specific changes, Option 1 would have broader consequences for Maritime NZ and the sector:

#### Longer term impacts

- Reversal of some of the progress toward being a proactive, risk-based regulator, we, and the sector has sought
- Weakened understanding of sector needs
- Reduced ability to deliver safe, secure, clean, and sustainable outcomes
- Risk of losing trust and mandate from the maritime industry

### Option Two: Maritime Levy adjustment to cover inflation

48. This option proposes a modest increase to the Maritime Levy to account for inflation-related cost pressures over the next three-year cycle. The first year also includes one-off costs for funding any necessary redundancies.
49. The adjustment is based on projected inflation rates (CPI), using Treasury forecasts and other reliable sources. In some areas where inflation is expected to be higher than Treasury estimates, we've applied evidence-based adjustments.
50. It's important to note that while this option helps address inflationary pressures, it does not resolve the existing levy revenue shortfall. As a result, Maritime NZ would still need to reduce staffing—though to a lesser extent than in Option 1. Under this option, approximately 25-30 roles would be disestablished (compared to 35 in Option 1), with associated redundancy costs factored into the first year of the cycle.
51. Most of the service and delivery impacts outlined in Option 1 would still be felt under Option 2, though slightly mitigated by retaining a small number of additional roles.
52. This option would result in a 6.35% increase in the maritime levies rates in the first year and 2.5% for the second and third years. The impact on vessels and operators is shown in Appendix 1.
- a. Based on an average of 1,622 visitors per ship and an average of 4.7 port visits per voyage, the additional cost per cruise passenger per voyage would be 12 cents.
  - b. A foreign container ship weighing 40,000 gross tonnes would increase in Year 1 by \$422 to \$7,067 per port visit, reducing to a \$169 increase to \$6,814 in Years 2 and 3 per port visit.
  - c. A domestic fishing vessel of 5.9 metres in length would increase in Year 1 by \$7 to \$123 per annum, reducing to a \$3 increase to \$118 per annum in Years 2 and 3.
  - d. A domestic passenger ferry with capacity to carry 1,350 passengers would increase in Year 1 by \$19,435 to \$325,729 per annum, reducing to \$7,774 to \$314,068 per annum.

## Option Three: Maritime Levy adjustment to address inflation and revenue shortfall

53. This option proposes a levy adjustment that covers both inflationary cost pressures and the current funding shortfall facing Maritime NZ.
54. It builds on the significant work already undertaken to reshape Maritime NZ’s operating model and deliver efficiencies. The proposed adjustment would allow Maritime NZ to maintain the improvements and commitments made during the last levy review—many of which were strongly supported by the sector. Unlike Options 1 and 2, this approach avoids the major risks and service reductions previously outlined.
55. The benefits of Option 3 are shown in the table below:

<b>Sustaining capability and sector confidence</b>
<p><b>Maintains core regulatory services and commitments from last levy review</b></p> <ul style="list-style-type: none"><li>• Avoids deep cuts to staffing and service delivery seen in Options 1 and 2</li><li>• Supports continued delivery of safe, secure, clean, and sustainable maritime outcomes</li><li>• Keeps momentum on improvements to certification seafarer and operator certification, including digitisation of processes, and MyMNZ</li><li>• Sustains progress in rule reform, including technical advice.</li><li>• Maintains stakeholder engagement and proactive work with stakeholders to address harm and further sector improvements</li><li>• Ensures Maritime NZ remains proactive rather than reactive and retains progress on changes to the regulatory approach</li></ul>
<p><b>Addresses both inflation and revenue shortfall</b></p> <ul style="list-style-type: none"><li>• Provides a realistic funding base to meet rising costs and close the \$3.1m shortfall</li><li>• Reduces reliance on reserves, which will be depleted by 2027/28</li><li>• Avoids the need for disruptive redundancy cycles and rehiring later</li></ul>
<p><b>Supports sector expectations</b></p> <ul style="list-style-type: none"><li>• Aligns with the sector’s desire for a modern, risk-based regulator</li><li>• Maintains trusted relationships and collaborative programmes</li><li>• Avoids reputational damage from reversing recent improvements</li></ul>
<p><b>Builds resilience</b></p> <ul style="list-style-type: none"><li>• Includes mechanisms to prevent over-recovery if revenue exceeds forecasts</li><li>• Offers flexibility to manage economic uncertainty and sector fluctuations</li><li>• Positions Maritime NZ to respond to future challenges without compromising service</li></ul>

56. This option would allow Maritime NZ to continue delivering its core regulatory functions without significant reductions in staffing or service levels. It supports the sector’s desire for a proactive, risk-based regulator and preserves the progress made in areas such as digital transformation, harm prevention, and rule reform.
57. This option would result in a 13.2% increase in Maritime Levies rates. The impact on vessels and operators is shown in Appendix 2.
- a. Based on an average of 1,622 visitors per ship and an average of 4.7 port visits per voyage, the additional cost per cruise passenger per voyage would be 26 cents.

- b. A foreign container ship weighing 40,000 gross tonnes would increase by \$877 to \$7,522 per port visit.
- c. A domestic fishing vessel of 5.9m in length would increase by \$15 to \$130 per annum.
- d. A domestic passenger ferry with capacity to carry 1,350 passengers would increase \$40,431 to \$346,724 per annum.

**Proposed refund mechanism for over-recovery of Maritime Levies 2027/28-2029/30**

- 58. This option is based on little increase in imports and cruise visits at 600. However, between 2027/2028 to 2029/2030, there may be both an increase in imports and cruise visits. This would mean that the levy shortfall reduces, thereby reducing the amount of money that needs to be collected.
- 59. To address this and ensure fairness in levy collection, should cruise and/or import revenue increase, this option will include a refund mechanism that returns over-recovered revenue to levy payers when it exceeds a 2% threshold above an average expenditure requirement of \$44.6 million over the three-year period. For example, if Cruise recovered and visits increased to 650-700-750 over the three years, then this option would result in an 8.7% increase, rather than 13% increase, in Maritime Levies rates. The additional cost per cruise passenger per voyage would be 17 cents.
- 60. The process will be automated where refunds will be issued as credits on the following year's invoices, based on audited financial accounts available each September. The mechanism applies universally to all levy payers and aims to support transparency and equity across the sector.




## Appendix 1: Option 2

Option 2 would result in a 6.35% increase in the maritime levies rates in the first year then 2.54% for the following two years. The 6.35% impact on vessels and operators is shown below.

**Table 5: Option 2 impact on vessels – an initial 6.35% increase in the first year**

Paid per port visit		Foreign Vessels	Current 2024/25	Proposed 2027/28	Proposed increase
	<b>International Oil Tanker (SOLAS)</b> GT 25,000 PAX 0 DWT 45,000		\$4,305	<b>\$4,578</b>	<b>\$273</b>
	<b>International Container Ship (SOLAS)</b> GT 40,000 PAX 0 DWT 52,000		\$6,645	<b>\$7,067</b>	<b>\$422</b>
	<b>International Cruise Vessel (SOLAS)</b> GT 110,000 PAX 2500 DWT 15000		\$20,719	<b>\$22,035</b>	<b>\$1,316</b>
Paid Annually		Domestic Vessels	Current 2024/25	Proposed 2027/28	Proposed increase
	<b>Domestic Passenger Ferry (SOLAS)</b> GT 22,365 PAX 1,350 DWT 5,794		\$306,294	<b>\$325,743</b>	<b>\$19,450</b>
	<b>Domestic Container Ship (SOLAS)</b> GT 6000 PAX 0 DWT 10,000		\$65,548	<b>\$69,711</b>	<b>\$4,162</b>
	<b>Domestic Coastal Fishing Trawler (non-SOLAS)</b> GT 529 PAX 0 DWT 0		\$5,548	<b>\$5,900</b>	<b>\$352</b>
	<b>Domestic fishing</b> Length 5.9 metres		\$115	<b>\$123</b>	<b>\$7</b>
	<b>Domestic non-passenger aquaculture vessel</b> (mussel barge) GT 104		\$1,091	<b>\$1,160</b>	<b>\$69</b>
	<b>Domestic non-passenger barge</b> GT 150		\$1,573	<b>\$1,673</b>	<b>\$100</b>
	<b>Domestic non-passenger</b> Length 23.9 metres (including tugs)		\$467	<b>\$497</b>	<b>\$30</b>
	<b>Domestic non-passenger</b> Length 8 metre workboat		\$156	<b>\$166</b>	<b>\$10</b>
	<b>Domestic Passenger Ferry (Non SOLAS)</b> GT 280 PAX 300 DWT 0		\$9,651	<b>\$10,264</b>	<b>\$613</b>
	<b>Domestic Charter Passenger Boat (Non SOLAS)</b> Length 18 metres PAX 140 DWT 0		\$3,485	<b>\$3,707</b>	<b>\$221</b>
	<b>Domestic Charter Passenger Boat (Non SOLAS)</b> Length 8 metres PAX 14 DWT 0		\$470	<b>\$499</b>	<b>\$30</b>
	<b>Domestic Commercial Jet Boat</b> Length 8.2 metres PAX 8 DWT 0		\$339	<b>\$361</b>	<b>\$22</b>
	<b>Domestic passenger</b> Commercial dive boat Length 4.5 metres PAX 4		\$177	<b>\$189</b>	<b>\$11</b>
	<b>Domestic passenger</b> 3.7 metre personal watercraft (jet ski/novel craft)		\$95	<b>\$101</b>	<b>\$6</b>

**Table 6: Option 2 impact on vessels – a 2.5% increase in the second and third years**

Paid per port visit		Foreign Vessels	Current 2024/25	Proposed 2028/29	Proposed increase
	<b>International Oil Tanker (SOLAS)</b> GT 25,000 PAX 0 DWT 45,000		\$4,305	<b>\$4,414</b>	<b>\$109</b>
	<b>International Container Ship (SOLAS)</b> GT 40,000 PAX 0 DWT 52,000		\$6,645	<b>\$6,814</b>	<b>\$169</b>
	<b>International Cruise Vessel (SOLAS)</b> GT 110,000 PAX 2500 DWT 15000		\$20,719	<b>\$21,245</b>	<b>\$526</b>

Paid Annually		Domestic Vessels	Current 2024/25	Proposed 2028/29	Proposed increase
	<b>Domestic Passenger Ferry (SOLAS)</b> GT 22,365 PAX 1,350 DWT 5,794		\$306,294	<b>\$314,068</b>	<b>\$7,774</b>
	<b>Domestic Container Ship (SOLAS)</b> GT 6000 PAX 0 DWT 10,000		\$65,548	<b>\$67,212</b>	<b>\$1,664</b>
	<b>Domestic Coastal Fishing Trawler (non-SOLAS)</b> GT 529 PAX 0 DWT 0		\$5,548	<b>\$5,688</b>	<b>\$141</b>
	<b>Domestic fishing</b> Length 5.9 metres		\$115	<b>\$118</b>	<b>\$3</b>
	<b>Domestic non-passenger aquaculture vessel (mussel barge)</b> GT 104		\$1,091	<b>\$1,118</b>	<b>\$28</b>
	<b>Domestic non-passenger barge</b> GT 150		\$1,573	<b>\$1,613</b>	<b>\$40</b>
	<b>Domestic non-passenger</b> Length 23.9 metres (including tugs)		\$467	<b>\$479</b>	<b>\$12</b>
	<b>Domestic non-passenger</b> Length 8 metre workboat		\$156	<b>\$160</b>	<b>\$4</b>
	<b>Domestic Passenger Ferry (Non SOLAS)</b> GT 280 PAX 300 DWT 0		\$9,651	<b>\$9,896</b>	<b>\$245</b>
	<b>Domestic Charter Passenger Boat (Non SOLAS)</b> Length 18 metres PAX 140 DWT 0		\$3,485	<b>\$3,574</b>	<b>\$88</b>
	<b>Domestic Charter Passenger Boat (Non SOLAS)</b> Length 8 metres PAX 14 DWT 0		\$470	<b>\$482</b>	<b>\$12</b>
	<b>Domestic Commercial Jet Boat</b> Length 8.2 metres PAX 8 DWT 0		\$339	<b>\$348</b>	<b>\$9</b>
	<b>Domestic passenger</b> Commercial dive boat Length 4.5 metres PAX 4		\$177	<b>\$182</b>	<b>\$5</b>
	<b>Domestic passenger</b> 3.7 metre personal watercraft (jet ski/novel craft)		\$95	<b>\$97</b>	<b>\$2</b>

**Table 7: Option 2 impact on Operators – a 6.35% increase in the first year**

Example of Operators	Current 2024/25 (excl GST)	Proposed 2027/28 (excl GST)	Increase
<b>Operator 1</b> Foreign cruise company, 3,117 average pax, 126,060 average GT, 10,926 average DWT, 125 port visits	\$3,041,332	\$3,234,318	<b>\$192,986</b>
<b>Operator 2</b> Foreign non-passenger company with 35 vessels, visiting 1-10 times per year, average 2 ports vists per voyage	\$3,131,165	\$3,329,845	<b>\$198,680</b>
<b>Operator 3</b> Commercial domestic passenger ferry company (SOLAS) 3 vessels	\$778,860	\$828,280	<b>\$49,420</b>
<b>Operator 4</b> Commercial domestic cargo company (SOLAS) 2 vessels	\$280,329	\$298,117	<b>\$17,787</b>
<b>Operator 5</b> Domestic passenger ferry company (non-SOLAS) 17 vessels 19-37m length and 150-650 pax per vessel	\$138,372	\$147,152	<b>\$8,780</b>
<b>Operator 6</b> Commercial fishing business with 2 vessels over 24 meters	\$2,790	\$2,967	<b>\$177</b>

**Table 8: Option 2 impact on Operators – a 2.5% increase in the second and third years**

Example of Operators	Current 2024/25 (excl GST)	Proposed 2028/29 (excl GST)	Increase
<b>Operator 1</b> Foreign cruise company, 3,117 average pax, 126,060 average GT, 10,926 average DWT, 125 port visits	\$3,041,332	\$3,118,527	<b>\$77,195</b>
<b>Operator 2</b> Foreign non-passenger company with 35 vessels, visiting 1-10 times per year, average 2 ports vists per voyage	\$3,131,165	\$3,210,629	<b>\$79,464</b>
<b>Operator 3</b> Commercial domestic passenger ferry company (SOLAS) 3 vessels	\$778,860	\$798,628	<b>\$19,768</b>
<b>Operator 4</b> Commercial domestic cargo company (SOLAS) 2 vessels	\$280,329	\$287,444	<b>\$7,115</b>
<b>Operator 5</b> Domestic passenger ferry company (non-SOLAS) 17 vessels 19-37m length and 150-650 pax per vessel	\$138,372	\$141,884	<b>\$3,512</b>
<b>Operator 6</b> Commercial fishing business with 2 vessels over 24 meters	\$2,790	\$2,860	<b>\$71</b>

## Appendix 2: Option 3

Option 3 would result in a 13.2% increase in the maritime levies rates. The impact on vessels and operators is shown below.

**Table 9: Option 3 impact on vessels – a 13.2% increase**

Paid per port visit		Foreign Vessels	Current 2024/25	Proposed 2027/28	Proposed increase
	<b>International Oil Tanker (SOLAS)</b> GT 25,000 PAX 0 DWT 45,000		\$4,305	<b>\$4,873</b>	<b>\$568</b>
	<b>International Container Ship (SOLAS)</b> GT 40,000 PAX 0 DWT 52,000		\$6,645	<b>\$7,522</b>	<b>\$877</b>
	<b>International Cruise Vessel (SOLAS)</b> GT 110,000 PAX 2500 DWT 15000		\$20,719	<b>\$23,454</b>	<b>\$2,735</b>
Paid Annually		Domestic Vessels	Current 2024/25	Proposed 2027/28	Proposed increase
	<b>Domestic Passenger Ferry (SOLAS)</b> GT 22,365 PAX 1,350 DWT 5,794		\$306,294	<b>\$346,724</b>	<b>\$40,431</b>
	<b>Domestic Container Ship (SOLAS)</b> GT 6000 PAX 0 DWT 10,000		\$65,548	<b>\$74,201</b>	<b>\$8,652</b>
	<b>Domestic Coastal Fishing Trawler (non-SOLAS)</b> GT 529 PAX 0 DWT 0		\$5,548	<b>\$6,280</b>	<b>\$732</b>
	<b>Domestic fishing</b> Length 5.9 metres		\$115	<b>\$130</b>	<b>\$15</b>
	<b>Domestic non-passenger aquaculture vessel (mussel barge) GT 104</b>		\$1,091	<b>\$1,235</b>	<b>\$144</b>
	<b>Domestic non-passenger barge</b> GT 150		\$1,573	<b>\$1,781</b>	<b>\$208</b>
	<b>Domestic non-passenger</b> Length 23.9 metres (including tugs)		\$467	<b>\$529</b>	<b>\$62</b>
	<b>Domestic non-passenger</b> Length 8 metre workboat		\$156	<b>\$177</b>	<b>\$21</b>
	<b>Domestic Passenger Ferry (Non SOLAS)</b> GT 280 PAX 300 DWT 0		\$9,651	<b>\$10,925</b>	<b>\$1,274</b>
	<b>Domestic Charter Passenger Boat (Non SOLAS)</b> Length 18 metres PAX 140 DWT 0		\$3,485	<b>\$3,945</b>	<b>\$460</b>
	<b>Domestic Charter Passenger Boat (Non SOLAS)</b> Length 8 metres PAX 14 DWT 0		\$470	<b>\$532</b>	<b>\$62</b>
	<b>Domestic Commercial Jet Boat</b> Length 8.2 metres PAX 8 DWT 0		\$339	<b>\$384</b>	<b>\$45</b>
	<b>Domestic passenger</b> Commercial dive boat Length 4.5 metres PAX 4		\$177	<b>\$201</b>	<b>\$23</b>
	<b>Domestic passenger</b> 3.7 metre personal watercraft (jet ski/novel craft)		\$95	<b>\$107</b>	<b>\$12</b>

**Table 10: Option 3 impact on Operators – a 13.2% increase**

<b>Example of Operators</b>	<b>Current 2024/25 (excl GST)</b>	<b>Proposed 2027/28 (excl GST)</b>	<b>Increase</b>
<b>Operator 1</b> Foreign cruise company, 3,117 average pax, 126,060 average GT, 10,926 average DWT, 125 port visits	\$3,041,332	\$3,442,782	<b>\$401,450</b>
<b>Operator 2</b> Foreign non-passenger company with 35 vessels, visiting 1-10 times per year, average 2 ports visits per voyage	\$3,131,165	\$3,544,478	<b>\$413,313</b>
<b>Operator 3</b> Commercial domestic passenger ferry company (SOLAS) 3 vessels	\$778,860	\$881,669	<b>\$102,810</b>
<b>Operator 4</b> Commercial domestic cargo company (SOLAS) 2 vessels	\$280,329	\$317,333	<b>\$37,003</b>
<b>Operator 5</b> Domestic passenger ferry company (non-SOLAS) 17 vessels 19-37m length and 150-650 pax per vessel	\$138,372	\$156,637	<b>\$18,265</b>
<b>Operator 6</b> Commercial fishing business with 2 vessels over 24 meters	\$2,790	\$3,158	<b>\$368</b>