Part 3I: Accessibility Rules – Proposal Summary for Consultation

This document is part of a series of documents to support consultation on changes to the existing Design, Construction and Equipment rules (the DCE rules). Other documents that form part of the consultation package include:

Invitation to Comment - An overview of the consultation package and summary of the proposals, including information on how to have your say on the proposals.

Proposal summaries - Details of the proposed changes for each of the five Rule topics being consulted on in this package: Survey and Certification; Navigation Systems and Equipment; Lifting Appliances and Working Gear; Accommodation, Escape and Personal Safety. This document is the proposal summary for Accessibility.

Draft Maritime Rules and draft Maritime Transport Instruments (MTIs) – a set of rules and MTIs for each of the four Rule topics.

A template to support preparation of your submission.

These documents, and other supporting information, can be accessed at

https://www.maritimenz.govt.nz/about-us/consultations/dce-40-series-package-3

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Purpose of this document

Maritime NZ is proposing significant reform of the Maritime Rules for vessel design, construction and equipment (the DCE Rules).

This document provides the detailed analysis of the accessibility provisions contained in the proposed new Accommodation, Access, Escape, and Personal Safety Rules and Maritime Transport Instrument (MTI). It explains our understanding of the issues and current situation (the 'status quo') under the present rules and sets out the analysis and rationale behind the proposed changes. Any potential impacts we have identified from the proposed amendments are also described. The information included is intended to meet the Government's Regulatory Impact Analysis requirements.

This document should be read in combination with the Invitation to Comment (which provides an overview of the proposed changes) and other documents that form part of the consultation package, available on Maritime NZ's website at

https://www.maritimenz.govt.nz/about-us/consultations/dce-40-series-package-3

Note:

The word ‘ship’ is used in the Maritime Transport Act 1994 and the proposed Rules and MTIs. This term is used to refer to any kind of boat or craft and does not refer to a craft of a specific size. For the avoidance of doubt, the terms vessel, ship and boat can be used interchangeably. This document uses the term ‘vessel’.

Structure of this document

This document is organised into four main parts:

- **Introduction and overview of proposals:** introduces accessibility in the maritime context, outlines the key proposals, and explains the scope and limitations of the rules.

  This section may be most useful if you want an overview of what is proposed and what is in scope.

- **Why we are proposing inclusive access to new passenger vessels:** explains the barriers faced by disabled passengers, the scale of the issue, and the economic, legal, and social drivers for change.

  This section may be most useful if you are interested in understanding the problem and the case for change.

- **Proposed accessibility requirements:** sets out the detailed requirements that would apply to new passenger vessels. It also includes how you can have a say on these proposed requirements.

This section may be most useful if you want to understand how the proposals would apply in practice, and how to make a submission.

- **Regulatory analysis:** explains the status quo, the problem definition, the options considered, and the rationale for the preferred approach.

  This section may be most useful if you are interested in how the options were assessed and the rationale for the preferred option.

These sections are intended to be read together as a complete explanation of the proposed changes, but can also be read independently depending on the reader's interests.

Introduction and overview of proposals

Introduction to accessibility

As part of Maritime NZ's review of the DCE rules, section 39 of the Maritime Transport Act 1994 requires a number of considerations to be taken into account, including whether the proposed rules improve access and mobility.

Key proposals

The proposals in this document are intended to improve accessibility for disabled passengers on vessels that carry 37 or more passengers or more than 100 tourists and sightseers[1]. They focus on a set of core accessibility features that support independent and safe use of passenger vessels. These include:

- **Boarding and disembarking:** Vessels would need to have at least one accessible means of boarding and disembarking that can be safely used by disabled passengers, including wheelchair users. Requirements for accessible parking spaces on vessels that carry vehicles would also apply. These requirements aim to provide a consistent minimum

[1] See the section *Which vessels the proposals apply to* on page 12 for more detail on the vessels covered by these proposals.

standard that supports independent access and reduces reliance on ad hoc assistance from crew.

- **Signs and communication:** Vessels would need to have signage and information in accessible formats (including large print, tactile text, and Braille) and have high-contrast visual markings for key features. Larger vessels would also be required to have enhanced communication systems (hearing aid loops and screens with accessible safety messages). These requirements are intended to ensure that all passengers can orient themselves, understand the onboard environment, and access important safety information.
- **Accessible routes:** Vessels would need to have accessible routes linking key areas, such as boarding points, seating, and accessible toilets. Minimum standards would apply to aisle and corridor width, gradients, obstructions, lighting, and door usability. These routes are designed to enable passengers to move safely and independently throughout the vessel and ensure that accessibility is continuous rather than limited to isolated areas.
- **Stairways:** Stairways would need to include features such as consistent step dimensions, handrails, slip-resistant surfaces, and tactile indicators. These measures are designed to improve safety and

usability, reduce the risk of trips and falls and support passengers with reduced mobility or low vision.

- **Priority seating and spaces for mobility devices:** Vessels would need to have a minimum number of priority seats and dedicated spaces for wheelchair users and others using mobility devices. These seats and spaces would need to be accessible, clearly marked, and comparable in quality to other seating areas. These requirements are designed to ensure that passengers with mobility needs can travel safely, comfortably, and with dignity; and remain in their mobility device where necessary.
- **Accessible toilets:** Vessels would need to have accessible toilet facilities with sufficient space to be used independently by passengers with mobility impairments. These facilities would need to have an appropriate layout and accessible fittings. These requirements are designed to ensure that passengers can undertake journeys without being excluded due to lack of suitable facilities, particularly on trips of longer duration.
- **Disability assistance animals:** This proposal is intended to ensure that passengers who rely on assistance animals (not limited to dogs) can travel with them safely and comfortably.

Achieving accessibility in a practical and cost-efficient way

The proposed accessibility requirements are designed to significantly improve access for disabled passengers over time, using an approach that is reasonably practicable for vessel operators to implement.

Accessibility requirements can add cost by increasing fit-out requirements, changing vessel layout and reducing capacity. The proposed approach seeks to manage these impacts in the following ways:

- **Design-stage integration:** The proposals are focused on new vessels. Accessibility can be incorporated at the design stage, making costs significantly lower than the cost to retrofit an existing vessel.
- **Efficient use of space:** Features such as flexible or multi-use spaces (e.g. flip-up seating) allow areas allocated for wheelchair users and mobility devices to be used by other passengers when not required, reducing the impact on seating capacity.
- **Focus on core accessibility features:** The proposals focus on a set of essential accessibility components (boarding, routes, seating, information, and toilets) that work together to enable independent use, rather than requiring full access to every area of a vessel.

- **Avoiding high-cost structural requirements**: In most cases, accessibility can be achieved within a single passenger deck linking entry, seating, and accessible toilets. This avoids the need for vertical access (e.g. lifts), which are a major cost driver in international models.
- **Flexible implementation:** The proposed requirements would allow a range of design solutions within clearly defined parameters, rather than prescribing a single approach. This would enable designers and operators to meet accessibility outcomes in a way that best fits their vessel, while maintaining consistency in core requirements.
- **Viable market for accessible second-hand vessels:** The proposals would also apply to imported second-hand vessels, provided they meet the accessibility requirements. Key elements, such as the minimum clear width for accessible routes (850 mm), have been set to align with common international standards, including Australia. This supports a viable market for second-hand vessels that already meet, or can meet, the requirements without significant modification.

Together, this design approach means that meaningful improvement in access, safety, and independence for

disabled passengers could be delivered in new vessels at modest additional cost.

Scope and limitations

The current rules review focuses on design, construction and equipment requirements –that is, how a vessel is designed and built and the equipment it carries. These rules do not include crew training and land-based facilities.

Crew training

While crew training is outside the scope of these proposed rules, it remains an important part of delivering accessible services in practice. Helpful and informed crew can support accessible vessel design in a range of ways, including:

- helping with boarding and disembarking where needed;
- offering clear verbal communication about vessel layout, facilities, and safety procedures;
- recognising when a passenger may need additional time, space, or assistance;
- supporting passengers to access priority seating or allocated spaces; and
- assisting passengers with reduced mobility or sensory impairments in emergency situations.

Not all disabilities are visible. Some passengers may have conditions such as sensory sensitivities, cognitive impairments, or health conditions that affect their ability to use transport but are not immediately apparent. Measures such as the use of discreet identifiers (for example, purple or sunflower lanyards or similar schemes) can help passengers signal that they may require assistance, without needing to disclose personal information. For these systems to be effective, crew need to be aware of them and understand how to respond appropriately and respectfully.

Operators can draw on guidance to support inclusive practice. For example, Auckland Transport has developed guidance on accessible travel and ways of working with disabled people.[2] This guidance includes practical advice for frontline staff on communication, assistance, and recognising diverse needs. Operators can use such resources to develop their own training and operational practices.

Land based infrastructure

Land-based infrastructure plays a significant role in determining how easily disabled passengers can access passenger vessel services. Wharf design, gradients, and tidal variation affect boarding conditions and not all

[2] See https://at.govt.nz/bus-train-ferry/accessible-travel/ways-of-working-for-whaikaha-accessibility-travel-in-tamaki-makarau

facilities are currently accessible. Accessibility may also be time variable – different levels of tide can lead to different boarding gradients.

These facilities fall outside the scope of the proposed DCE rule changes. They are typically owned and managed by local authorities or port companies or other local authorities. Around New Zealand, improvements to these facilities are being made as existing infrastructure is upgraded or renewed.

These limitations do not reduce the importance of requiring accessible vessels. Accessible vessel design ensures that where boarding is possible passengers can travel independently once on board. It also supports accessibility where land-based infrastructure is being upgraded over time.

What do the changes mean for my ship/vessel/boat?

A ‘snapshot’ of the proposed changes in this document is included in Appendix 1 to this document.

Please note:

This document sets out the main changes that are proposed but does not include all changes that may have an impact on an operation. Therefore, we strongly

recommend you also refer to the draft rule and maritime transport instrument.

Why we are proposing inclusive access to new passenger vessels

Barriers in boarding, movement, information, and onboard facilities mean that many disabled people are currently unable to use passenger vessels – either independently or at all. These barriers result in reduced or foregone travel, and limit access to essential services, education, employment, and social participation. Accessibility features are increasingly incorporated into other public transport modes, but remain inconsistent in passenger vessels.

At the same time, demographic change, legal obligations, and growth in accessible tourism are increasing demand for accessible transport. Together, these factors indicate a growing gap between current levels of accessibility and what is needed to ensure consistent and practical access to passenger vessel services.

Lack of accessible transport modes is a significant barrier to disabled people

A lack of accessible transport options is a significant problem for many disabled people in New Zealand. Data from the Household Disability Survey 2023 shows that disabled people are around twice as likely as

non-disabled people to experience frequent difficulty getting to places due to transport problems (13% vs 6%), and around one in five do not use public transport because of disability.

These figures indicate that a substantial proportion of disabled people face either persistent barriers or complete exclusion from core transport modes. Where barriers exist, disabled people often reduce or avoid travel, meaning observed usage is likely to under-represent demand for accessible services (Waka Kotahi, Transport experiences of disabled people, 2022).

The effects of these barriers are significant. Disabled people are around six times more likely to be unable to access healthcare due to lack of transport, with about 1 in 9 reporting missed GP care for this reason (Ministry of Health, New Zealand Health Survey 2024/25). This demonstrates that transport barriers have direct impacts on access to essential services and participation in everyday activities, including employment, education, health care, and social participation (Waka Kotahi, 2022).

Passenger vessels are out of step with other transport modes

Urban buses[3] and trains[4] are required to incorporate accessibility features through funding requirements and procurement processes, making passenger vessels an outlier. Journeys often rely on more than one mode of public transport. Accessible ferries are therefore a necessary component of an accessible transport system.

Commuter ferries often serve areas where physical constraints (e.g. harbours) mean other transport options take much longer. A passenger ferry that is not accessible can result in a significantly longer journey for a disabled person compared to the general public.

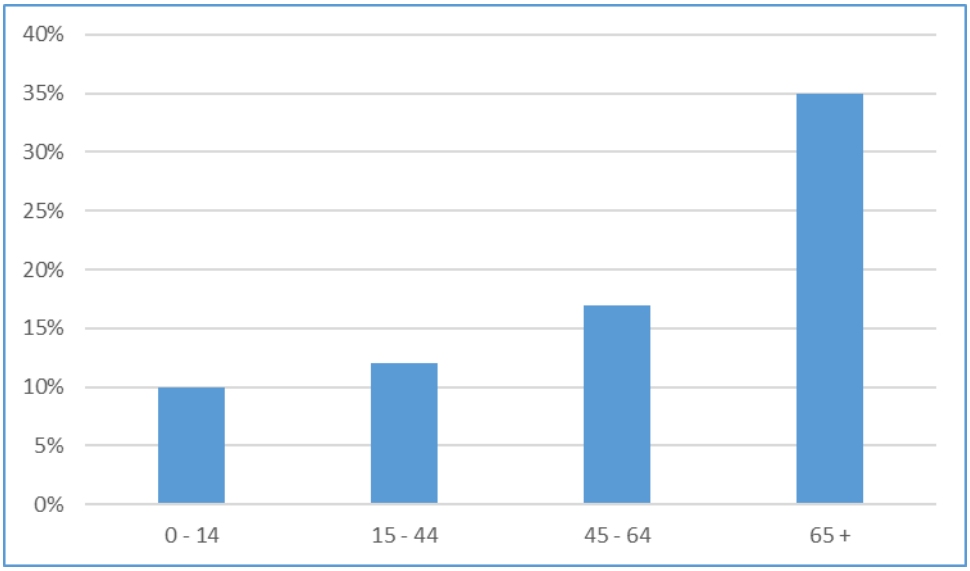
[3] The New Zealand Transport Agency (2026), *Requirements for Urban Buses in New Zealand for Consistent Urban Bus Quality*, links funding for urban buses to a range of measures including accessibility for disabled people.

[4] Metro rail services in Auckland and Wellington are publicly funded and procured through regional councils, which embed accessibility requirements in service design, infrastructure, and rolling stock.

Disability prevalence is high and likely to increase

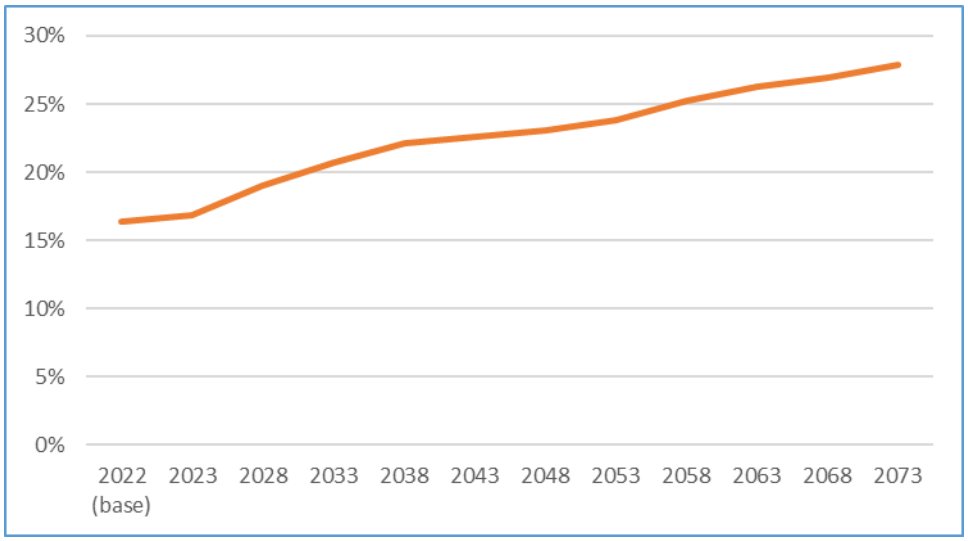
New Zealand's population includes a substantial number of disabled people: Around 10% of children, 18% of adults and 17% of New Zealand's population overall - 851,000 people - have a disability. Disability rates increase with age and New Zealand has a rapidly ageing population (see figures one and two). This means that the number of disabled people in New Zealand will continue to grow over time.

Figure 1: Disability prevalence by age[5]



[5] Stats NZ (2025), Disability statistics: 2023: Household Disability Survey results.

Figure 2: New Zealand population over the age of 65 years[6]



New Zealand has national and international obligations to support accessibility

New Zealand law prohibits discrimination on the basis of disability in the provision of goods and services. The Human Rights Act 1993 establishes an expectation that services available to the public, including transport, are accessible unless there is a justified exception. Broader policy settings reinforced this approach. The New

[6] Stats NZ (2022), National population projections: 2022(base)–2073

Zealand Disability Strategy[7] identifies access to transport and the built environment as a core outcome and emphasises inclusive design as a means of enabling participation.

New Zealand is also a Party to the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The CRPD requires Parties to ensure access to transportation on an equal basis with others and to progressively improve accessibility.

Together, these obligations support a more consistent and systematic approach to accessibility, particularly where it can be incorporated at the design stage.

International approaches to accessibility on passenger vessels

In addition to New Zealand's legal obligations, accessibility on passenger vessels is already regulated in most comparable jurisdictions, although the approach taken varies. For example, Australia applies detailed accessibility standards to passenger vessels, while other jurisdictions such as the United States rely more on non-discrimination and passenger rights frameworks. These approaches demonstrate that requiring

[7] www.whaikaha.govt.nz/resources/strategies-and-studies/strategies/new-zealand-disability-strategy

accessibility is a well-established and practical response to improving access to passenger vessel services.[8]

Tourism and economic opportunities

Accessibility also has important economic implications, particularly for tourism. International tourism is a major contributor to the New Zealand economy. International visitors contributed $18.1 billion in expenditure in the year ended March 2025, making tourism New Zealand's second-largest export earner, accounting for 17% of total exports.

Disabled people are consumers, travellers, and tourists, and are often accompanied by family, friends, or carers. Where services are accessible they are used by a wider range of people, increasing the potential customer base and supporting higher utilisation.

Older travellers are an increasingly important segment of international tourism. The proportion of visitors aged 65 and over increased from 11% in 2004 to 18.5% in 2025.[9] Older travellers are more likely to take longer trips and contribute more to total expenditure per trip, reflecting longer stays and preferences for higher-value

[8] See Appendix 2 for more discussion of the approaches taken in other jurisdictions.
[9] Stats NZ International Travel / Visitor Surveys

services.[10] They also place greater importance on comfort, ease of use, and reliability, and are less likely to travel where these are uncertain.[11]

Disability prevalence increases with age. As visitor populations become older, a growing share of international tourists are likely to have accessibility needs. International evidence identifies accessible tourism as a growing segment of the global market, driven in part by population ageing and increased participation by people with access needs.[12]

Research undertaken by AUT's Tourism For All NZ Research Group indicates that accessible tourism is a significant and growing segment of the global tourism market and that travellers with access needs would travel more if accessible experiences were consistently provided and clearly communicated.[13]

Passenger vessels are often part of the visitor experience, particularly where they provide access to harbours, islands or scenic locations. Where these services are not accessible, this can limit participation

[10] OECD (2020), Tourism Trends and Policies (see sections on "Silver Tourism" and visitor value).
[11] UNWTO (2016), Accessible Tourism for All; UNWTO (2018), Tourism and Ageing.
[12] UNWTO (2016), Accessible Tourism for All; UNWTO (2018), Tourism and Ageing.
[13] Cockburn-Wootten & McIntosh (2020), Improving the Accessibility of the Tourism Industry in New Zealand.

and constrain tourism activity. Improving accessibility can expand the customer base and increase utilisation by enabling a wider range of passengers to travel.

The market is unlikely to deliver accessibility on its own

The evidence indicates that, while some operators are already taking steps to improve accessibility, outcomes are likely to remain underprovided and inconsistently delivered when relying on market signals alone.

Accessibility barriers and uncertainty about accessibility can both reduce travel, obscuring underlying demand and limiting its visibility to operators. Where passengers cannot reliably determine if a service will meet their needs, uncertainty itself may discourage travel. Consistent accessibility standards can therefore help make demand more visible by increasing passenger confidence that a service will be usable. This ‘hidden demand’ is a form of market failure caused by incomplete information, where operators underestimate the level of unmet demand and the commercial benefits of accessibility and under-invest in it. Accessibility also generates wider social and economic benefits — including improved participation in employment, education, and tourism — that are not fully reflected in operators’ commercial decisions. As a result, these

benefits are not consistently taken into account in investment choices.

These factors, combined with the long service life of vessels and the importance of design-stage decisions, mean that accessibility is likely to be variable, incomplete, and slow to improve without clearer and more consistent requirements through maritime rules.

Proposed accessibility requirements

This section sets out the proposed accessibility requirements for new passenger vessels, including the vessels to which they would apply. It also includes consultation questions seeking feedback on the proposed requirements and their practical implementation

Which vessels the proposals apply to

The proposed accessibility requirements would apply to “new” passenger ferries that carry 37 or more passengers and tourism and sightseeing vessels that carry more than 100 passengers. In this context, tourism and sightseeing vessels are pre-booked passenger services that operate to a published itinerary or destination (such as scenic or visitor attractions) and carry more than 100 passengers.

The proposals would not apply to existing passenger vessels operating in New Zealand.

Passenger ferries with scheduled timetables that carry 37 passengers or more

This would include the main Auckland and Wellington commuter ferries as well as some other services around New Zealand.

The 37-passenger threshold reflects a point at which vessels transition from small craft to more structured passenger services, with defined layouts and capacity to incorporate accessibility features. Below this level, space-constraints limit the ability to include accessibility features without disproportionate impacts.

The 37-passenger threshold aligns with common thresholds used internationally.

Tourism and sightseeing vessels that carry more than 100 passengers

A higher threshold of 100 passengers is proposed for tourism and sightseeing vessels. This would include activities such as whale watching and tourist vessels in Milford Sound.

The 100-passenger threshold reflects typical vessel sizes in the tourism sector. It recognises that smaller vessels often operate with space and layout constraints that make it harder to incorporate accessibility features, and carry fewer passengers over which to spread those costs.

What would a new vessel be?

A “new” vessel would include:

- Newly constructed vessels that enter service after the commencement date of the rules; and

- Second-hand vessels that enter service after the commencement date.

Some Australian vessels and vessels surveyed to class are not required to meet all of the proposed new DCE rules, but they would be required to meet all of the accessibility requirements proposed in this document.

Why do the proposals only apply to new vessels?

By focusing on new vessels, the proposals seek to provide certainty for designers, builders and operators while supporting improvements in accessibility over time.

Retrofitting existing vessels would disrupt services. The costs could be disproportionate to the value of the vessel, and recouping this outlay through higher prices would not be viable for some operators.

Questions on which vessels the proposed accessibility requirements would apply to

1. Do you think the proposed passenger thresholds (37 for ferries, 100 for tourism vessels) appropriately capture the vessels where accessibility requirements should apply?

   [Answers: Yes; No]

   Why / why not?

2. For disabled passengers: would these thresholds meaningfully improve your ability to use passenger vessels or would important services remain inaccessible?

   [Answers: Yes; No; Partially]

   Why / why not?

3. Are there specific vessel types, routes, or locations where the proposed thresholds would include or exclude vessels in a way that seems inappropriate?

   [Answers: Yes; No]

   Which vessels? Why

4. From an operator or designer perspective, are the thresholds practical and workable, or do they create unintended implementation issues?

   [Answers: Yes; No; Partially]

   Why / why not?

Proposed accessibility measures

The proposed accessibility requirements are summarised below. They are designed to work together to ensure that all passengers, including disabled passengers, can board a vessel, move around it, and access key facilities as independently and safely as possible.

The proposals address six key areas:

- **Boarding and disembarking:** getting on and off the ship safely
- **Signs and communication:** helping passengers understand where things are and how to use them
- **Accessible routes:** providing a clear path linking key parts of the ship
- **Stairways**: ensuring safe movement between levels
- **Accessible toilets:** ensuring essential facilities can be used independently
- **Seating and spaces:** making sure there is room to sit or travel safely, including for wheelchair users

Boarding and disembarking

Passengers

Getting on and off a vessel is the first and most important step. If boarding is difficult or unsafe, people may not be able to travel at all.

We propose that a vessel would need to have at least one means of embarking and disembarking suitable for use by disabled passengers, including users of wheelchairs or other mobility devices. This means of entry and exit would need to:

- have a slip-resistant surface;

- be fitted with handrails on both sides at heights between 850 and 900 mm; and
- have an upstand or kerb on both sides that is at least 75 mm high to prevent wheels running off.

The gradient of a gangway would not be able to be greater than 1:12.

Vehicles

Only a small number of vessels (mainly the Cook Strait ferries and some small harbour/river crossings) currently carry passenger vehicles (i.e. cars). Where these vessels operate, they should be accessible for all users.

We propose that such vessels would need to have priority parking spaces for holders of mobility parking permits, as follows:

- Two for the first 37 parking spaces; plus
- One for every 50 additional parking spaces.

These priority parking spaces would need to:

- Be clearly marked in yellow text or symbols and display the wheelchair symbol (the International Symbol of Access); and
- Be at least 3,200 mm wide and 7,800 mm long, with at least 2,500 mm of vertical clearance; and

- Include an adjacent access aisle at least 1,600 mm wide, marked with yellow signage discouraging parking over it, to allow wheelchair users and others to safely enter and exit their vehicles (this could serve two priority parking spaces if they are side by side); and
- Be connected to passenger accommodation areas by an accessible route that is free from traffic and clearly marked.

These measures are intended to ensure that disabled passengers can get in and out of vehicles safely and move between their vehicle and the ship independently, or with minimal assistance, in a way that is comparable to other passengers.

Priority parking spaces would be available for other passengers to use when not required. For logistical reasons (e.g. ensuring that the space is not used) operators would be able to require reasonable notice prior to boarding that a priority space is needed.

Questions about boarding and disembarking

5. For disabled passengers: how easy or difficult is it currently to board and disembark from passenger vessels, and would the proposed requirements address the main barriers you experience?

   [Answers: Very easy; Easy; Moderately Easy; Difficult; Very Difficult; Impossible]

In what way? On which vessel(s)?

6. Do the proposed requirements enable safe and independent boarding in a realistic range of operating conditions (e.g. tides, weather, wharf design)?

   [Answers: Yes; No; Partially]

   Why / Why not?

7. What challenges might arise in implementing these requirements across different vessel types or operating environments?

   [Answers: Describe challenges]

   What could help to address this?

8. Are there alternative approaches that could better support safe and dignified boarding (with or without crew assistance)?

   [Answers: Yes; No]

   How?

Signs and communication

The location of key features would need to be clearly communicated to support passengers to move freely around the vessel. Information would need to be clearly communicated in ways that can be understood by everyone, including people with a wide range of physical, sensory, and cognitive needs.

Signs

We propose that signs would need to be in multiple accessible formats:

- Large print.
- High-contrast tactile print.
- Braille and other tactile markers.

Signs would also be required at priority seating and allocated seating areas (see below) to inform passengers that these seats must be vacated when needed by disabled passengers or others requiring assistance. The signage would need to explicitly note that not all disabilities are visible.

High contrast markings for safety and visibility

To help people with low vision move around safely, the following features would require colours that provide strong visual contrast against their background:

- Handrails.
- Steps and stairways (with clear contrast between treads and risers).
- Ramps and coamings.
- Handholds in priority seating areas and wheelchair-accessible spaces.
- Door handles.

- Fixtures and fittings inside accessible toilets.

Technical aids for hearing and vision

Larger vessels present additional spatial and acoustic challenges and less opportunity for direct interpersonal communication and manual assistance from crew. Vessels that carry more than 100 passengers would need to have:

- A working hearing aid loop system covering all passenger-accessible areas so that onboard announcements can be heard clearly by passengers using hearing aids
- Electronic screens displaying pre-loaded safety messages visually, in sign language and with audio descriptions.

Questions about signs and communication

9. For disabled passengers: would the proposed signage, markings, and communication systems allow you to understand and navigate the vessel with confidence?

   [Answers: Yes; No; Partially]

   Why / Why not?

10. Are the proposed requirements (e.g. tactile signs, high contrast, audio/visual information) proportionate and effective across different vessel sizes?

    [Answers: Yes; No; Partially]

Why / Why not?

11. For larger vessels (>100 passengers), are the proposed communication systems (e.g. hearing loops, visual displays) necessary and practical?

    [Answers: Yes; No]
    Why / Why not?

12. Are there other communication methods or technologies that should be considered?

    [Answers: Yes; No]

    What are they? How would they help?

Accessible routes

All passengers need to be able to move around the ship safely and independently to reach key areas. We propose that, at a minimum, there would need to be accessible routes between:

- Boarding and disembarkation areas.
- Priority seating and allocated spaces for users of wheelchairs and other mobility devices.
- Accessible toilets.

An accessible route would need to meet specific requirements:

- Have a minimum clear width of 850 millimetres, including through doorways.
- Be free of any obstructions that reduce the clear width.

- Level changes could not exceed 20 millimetres without a ramp.
- Ramp gradients could not have a gradient exceeding 1:12.
- Be well illuminated day and night.

Doors on accessible routes would need:

- to be easy to open so that they can be operated by people with limited dexterity; and
- operable using one hand, without requiring the user to release or reposition themselves.

Door handles would need to be positioned between 900 millimetres and 1,200 millimetres so that users of wheelchairs or other mobility devices can reach them without excessive stretching or leaning.

Lifts

Lifts that form part of accessible routes must have:

- Minimum car size of 1400 mm by 1400 mm
- Minimum door opening of 900 mm
- Controls located between 900 mm and 1350 mm above the floor
- Raised labels and Braille labels for control buttons
- Both visual and audible lift position indicators

Questions about accessible routes

13. For disabled passengers: would the proposed accessible routes allow you to move around the

vessel independently and reach key areas (e.g. seating, toilets)?

[Answers: Yes; No; Partially]

Why / Why not?

14. Are there situations where providing continuous accessible routes would be difficult or impractical? If so, how should these be managed?

    [Answers: Yes; No]

    What are they? How should they be managed?

15. What design trade-offs are likely to arise (e.g. space, capacity, layout efficiency), and are they reasonable?

    [Answers: Yes; No; It depends]

    What are the tradeoffs? Are they reasonable?

16. Do the proposed minimum dimensions and requirements strike the right balance between usability and feasibility?

    [Answers: Yes; No; Partially]

    Why / Why not?

Stairways

Stairways would need to incorporate features intended to improve safety for passengers with reduced mobility or low vision. These would include:

- Consistent step heights.
- Handrails on both sides at a height between 900 mm and 1000 mm above treads.
- Have slip resistant treads.
- Have tactile ground surface indicators at the top and bottom of each flight to provide warning and guidance for visually impaired passengers.

Questions about stairways

17. For passengers with reduced mobility or vision: would the proposed stairway features make stair use safer and more manageable?

    [Answers: Yes; No; Partially]

    Why / Why not?

18. Are there practical or durability issues with features such as tactile indicators or high-contrast markings in marine environments?

    [Answers: Yes; No]

    Why / Why not?

19. Do you have design or practicality concerns with the proposed stairway requirements?

    [Answers: Yes; No; Partially]

    Why / Why not?

Priority seating and spaces for users of mobility devices

Being able to sit safely and comfortably during a journey is important for many passengers. For some people, this includes having seating that is easier to access or having space to remain in a wheelchair or other mobility device.

We propose that vessels would need to have both priority seating and allocated spaces for mobility devices, designed so that passengers can travel safely and independently. These areas would need to be:

- Located along accessible routes and close to entry and exit points.
- Clearly marked, including signage indicating that spaces must be vacated when needed.
- Designed so that users are not placed at a disadvantage compared with other passengers, including in relation to comfort, visibility, and access to onboard information.
- Designed to provide space for a disability-assistance animal to remain alongside the passenger.

Priority seating

We propose that there would need to be at least:

- 4 priority seats for the first 50 passengers; and
- 2 additional seats for every additional 50 passengers (or part of 50).

These seats would need to be:

- easy to access and use; and
- designed to allow passengers to sit down and stand up safely, including with the use of handholds.

Allocated spaces for users of wheelchairs and other mobility devices

We propose that there would need to be at least:

- 2 allocated spaces for the first 37 passengers; and
- 1 additional space for every further 50 passengers (or part of 50).

These spaces would need to have:

- A minimum length of 1300 mm and a minimum width of 800 mm (the same dimensions as allocated spaces on urban buses).
- A clear turning circle with a diameter of 1925 mm next to or adjacent to the allocated space.

To make best use of space, flip-up seating would be allowed so that other passengers could use the space

when not needed. This seating would need to be vacated when needed.

Questions about priority seating and allocated seating for users of wheelchairs and other mobility devices

20. For disabled passengers: would the proposed seating and allocated spaces enable you to travel safely, comfortably, and with dignity?

    [Answers: Yes; No; Partially]

    Why / Why not?

21. Are the proposed numbers of priority seats and wheelchair/mobility spaces sufficient and appropriate?

    [Answers: Yes; No]

    Why / Why not?

22. What impacts might these requirements have on vessel layout, capacity, and operations, and are these impacts manageable?

    [Answer: Please explain the impacts and whether they are manageable]

23. Do you support the approach of using flexible seating (e.g. flip-up seats) to balance accessibility and capacity?

[Answers: Yes; No; Partially]

Why / Why not?

Accessible toilets

Being able to access a toilet is a basic requirement for travel. For disabled passengers, this means having access to a toilet that can be used safely, independently, and with dignity.

We propose that every vessel that carries more than 50 passengers must have at least one accessible toilet that meets the specifications below. To reduce the impact of this on costs, an accessible toilet can replace two standard toilets that would otherwise be required.

Size

A person using a wheelchair or mobility device needs to be able to enter, turn, and use a toilet. This requires more space than a standard toilet. The proposed overall dimensions of an accessible toilet are:

- 2.0 metres long.
- 1.6 metres wide.

Internal layout, fittings, and facilities

The layout and fittings need to provide enough space and support to enable a person to transfer from a wheelchair to the toilet comfortably. We propose that accessible toilets would need to:

- Be arranged so that there are no obstacles or fittings that restrict movement or access around the toilet.
- Provide clear space beside the toilet to allow a person to transfer from a wheelchair. This would need to be 1150 mm between the far-side wall and the centre of the toilet pan.
- Have a grab rail beside the toilet with both horizontal and vertical sections that are easy to reach and positioned to support transferal, sitting and standing.
- Have the toilet positioned at a height between 460 – 480 mm suitable for safe and easy transfer.
- Include a toilet lid that can act as a backrest when raised.
- Be accompanied by a washbasin at least 230 mm forward of the toilet so that it can be reached for washing but does not restrict movement.

Entrances

We propose that entrance to an accessible toilet would need to be one of the following:

- Door-free (with privacy protected through use of angled entryways, privacy screens, partitioned layout); or
- An automatic door with push-button operation; or
- A sliding door; or
- A hinged door that swings outward (so that it does not limit maneuverability within).

Accessible toilet doors would also need to comply with the requirements for doors on accessible routes (see above).

Questions about accessible toilets

24. For disabled passengers: would the proposed accessible toilet design allow you to use the facility independently and safely?

    [Answers: Yes; No; Partially]

    Why / Why not?

25. Are the proposed dimensions and layout requirements achievable across the range of vessels covered?

    [Answers: Yes; No; Partially]

    Why / Why not? Which vessels?

26. What are the main cost, space, or design challenges associated with providing accessible toilets?

    [Answers: Please describe]

27. Are there alternative designs that could achieve similar accessibility outcomes with less impact on space?

    [Answers: Yes; No]

What are those approaches? How do they achieve this?

Disability support animals

Guide dogs are the most widely recognised form of disability assistance animal and are a regular sight on public transport in New Zealand. However, feedback from people with lived experience indicates that limiting access to guide dogs may unnecessarily restrict accessibility. Individuals with a range of disabilities, including sensory, physical, neurological, and mental health conditions, may rely on other trained animals to provide functional or therapeutic benefits. For example, some animals assist with anxiety regulation or interrupting distress episodes, which can be particularly important in crowded, noisy, or unfamiliar transport environments such as ferries.

Allowing a broader category of assistance animals, rather than only specifying guide dogs, would better reflect the diversity of user needs and support more inclusive access. This approach would be reliant on operators, who can require appropriate behavioural standards and that animals are kept under control to ensure safety.

Under the proposal:

- Priority seating areas would need to be configured to allow a disability assistance animal to sit comfortably alongside the passenger.
- These seating areas would need to have signage indicating that disability assistance animal are permitted in the area.

We are keen to hear from both operators and people who use disability assistance animals on the questions below to help us refine these proposed arrangements.

Questions about disability support animals

28. Do you support allowing a broader range of disability assistance animals (beyond guide dogs) on passenger vessels? Why or why not?

    [Answers: Yes; No; It depends]

    Why / Why not? Do you have any particular concerns?

29. For disabled passengers: would this improve your ability to use passenger vessels?

    [Answers: Yes; No; Partially]

    Why / Why not?

30. For operators: what conditions do you think should apply if disability assistance animals are allowed?

    [Answers: Please describe the conditions that you think should apply and why]

31. What practical or safety considerations should be taken into account (e.g. space, behaviour, passenger comfort)?

    [Answers: Please describe these measures and why you think they should be in place]

Questions about accessibility and travel decisions

32. Have accessibility barriers, or uncertainty about whether a passenger vessel would meet your needs, ever caused you to: not take a trip; take fewer trips; choose a different mode of transportation; or choose a different activity/destination?

    [Answers: Yes, No]

    If yes, please describe what happened.

33. If passenger vessel accessibility was more consistent and predictable across operators, would you be more likely to travel by ferry or passenger vessel?

    [Answers: Yes, No]

    If not, why not?

34. For disabled passengers, carers, support people and disability organisations: are there particular

accessibility features that most influence your decision to travel?

[Answers: Please describe].

How to have your say

The deadline for providing comment on these proposals is **5pm on Friday 25 September 2026**.

This document is part of a package of documents on the proposed changes to the design, construction and equipment rules. Information on this consultation will be available on Maritime NZ's website and through Maritime NZ's SeaChange newsletter.

Subject to interest, Maritime NZ will hold online information sessions on the proposals during the weeks of **17 to 21 August and 7 to 11 September**. Please contact us at the email address provided below if you would like to attend a session or if you would like us to contact you to discuss any of the proposals.

We welcome any feedback you would like to provide. Submissions can be made by completing the submission form on our website (**https://www.maritimenz.govt.nz/about-us/consultations/dce-40-series-package-3**), or in any other written form; and:

- emailed to us at 40.series@maritimenz.govt.nz; or

- posted to the Regulatory Reform Projects Team, Maritime NZ, PO Box 25620, Wellington 6140.

This document includes questions to help you focus your feedback. Answering the questions is optional.

Submissions are public information

Please let us know if your comments are commercially sensitive or if for some reason you consider they should not be disclosed. If your submission is subject to an Official Information Act (OIA) request, Maritime NZ will consider your confidentiality request in accordance with the grounds for withholding information set out in the OIA.

In addition, if you are an individual (that is your comments are made personally and not on behalf of a company or an organisation), please let us know if you have reasons that your identity should not be disclosed.

We will acknowledge all submissions that we receive.

Regulatory analysis

Status quo

Most passenger vessels in New Zealand do not provide a consistent set of accessibility features enabling use by disabled people, but there are some exceptions:

- Some tourist vessels have accessibility features, such as improved boarding arrangements, manoeuvrability, or seating for wheelchair users. In some cases these features may reflect vessel design characteristics rather than accessibility-specific requirements, while in others they reflect deliberate operator investment.
- Some large Cook Strait ferries include individual accessibility features, such as lifts between decks and relatively wide passageways. However, accessibility is not consistently provided across boarding, movement, seating, and facilities.

In recent years, Auckland Transport has taken a more systematic approach to accessibility on the ferry services it funds or operates. This includes:

- requirements for new or replacement vessels to incorporate a range of accessibility features; and
- operational measures such as crew training to assist passengers.

These requirements are less extensive than those proposed in the draft new maritime rules and apply only to Auckland Transport services.

Outside of the examples above, there is little evidence of a consistent or industry-wide move toward accessibility. In particular:

- The current maritime rules do not require accessibility;
- Voluntary uptake by operators has been limited; and
- Recent and planned new vessel builds have, in most cases, not incorporated accessibility features in a systematic way. This suggests that accessibility is not being routinely considered at the design stage.

As a result, accessibility across the New Zealand passenger fleet is fragmented, inconsistent, and often absent. This limits the ability of disabled people to use ferry and tourism services independently and reliably.

What is the problem / rationale for the change?

The current approach results in a transport system where access is uncertain, inconsistent, and often unavailable for disabled passengers.

The core problem is that accessibility is:

- not required as part of vessel design, and
- not routinely incorporated into new vessels that enter the commercial fleet.

This leads to several issues:

- **Limited access to ferry services.** Barriers in boarding, movement, seating, and facilities mean that many disabled people are unable to use passenger vessels independently, or at all. This results in reduced or foregone travel and limits access to essential services, education, employment, and social participation.
- **Inconsistent and unpredictable outcomes.** Accessibility varies significantly between vessels and services. For many disabled people, travel is only practical where accessibility can be relied on. This uncertainty reduces confidence and discourages use.
- **Market signals are not effective.** The research indicates that disabled people avoid services that are not accessible. As a result, potential demand is not visible to operators and is not reflected in observed usage. This 'hidden demand' leads to underestimation of the benefits of accessibility and reduces incentives to invest.
- **Missed opportunity at the design stage**. Accessibility is most effectively and cost-efficiently when vessels are designed and built. Features that are not included at that point are difficult and costly to retrofit later.

- **Poor accessibility is ‘locked in’ for decades.** Passenger vessels are long-lived assets, often operating for 25 to 40 years. New vessels without accessibility features will remain in service for decades, locking in barriers for future users.
- **Lack of incentives to change.** In the absence of regulatory requirements there are limited incentives for operators to invest in accessibility.

These issues reflect a combination of information failure and wider social and economic benefits that are not captured in commercial decision-making. Demand for accessible services is not fully visible, and the benefits of accessibility — including improved participation in employment, education, and tourism — extend beyond individual operators.

Without regulatory change, these factors mean that accessibility is likely to remain absent, inconsistent and slow to improve. This means that accessibility will not improve consistently without intervention, particularly at the point of vessel design where decisions have long-term impact.

The rationale for change is therefore to ensure that accessibility is incorporated at the point where it can be achieved most effectively – during vessel design and construction – so that the passenger vessel fleet becomes progressively more accessible over time.

Impact of the proposed change

Improved accessibility

The proposed accessibility requirements are expected to deliver social, operational, and economic benefits by reducing barriers to the use of passenger vessels and enabling more people to travel. Benefits include:

- **Improved access and participation:** The primary benefit is enabling trips that would otherwise not occur due to accessibility barriers. This will increase the ability of disabled people to access passenger transport, improve access to health care, education and social activities, and support greater participation in economic and community life. These benefits are strongest where passenger vessels form part of essential or time-sensitive travel routes.
- **Improved service quality:** All passengers benefit from improved usability associated with accessibility features such as wider layouts, better signage, and access to accessible toilets, which can be more convenient for a wide range of users.
- **Improved safety: Accessibility features also bring safety benefits.** These include contrasting colours that improve visibility of key safety features and reduce accident risk; improved communication systems that improve delivery and understanding of

safety information; and clearer routes that support safer movement around the vessel, particularly in emergency scenarios.

- **Increased passenger revenue and tourism:** Improved accessibility increases the number of paying customers. This includes disabled people who currently avoid travel, people accompanying them, and other passengers – especially the elderly - who benefit from accessibility. More consistent and predictable accessibility is expected to support increased use by both domestic and international tourists. This will benefit individual operators and the wider tourism sector.

These benefits are discussed further in Appendix 3.

Vessel level impacts

These proposals would not have an immediate impact because they would only apply to new vessels. Instead, accessibility would progressively increase over the next 40 years as existing vessels reach the end of their useful life.

Costs are estimated to be in the range of ~1% to ~5% of new build cost. Actual costs will depend on vessel design and complexity – for example whether accessibility is treated as an integral feature at the design stage and takes advantage of space-saving options such as flip-up seats.

Publicly available information on the cost of new passenger vessels is limited. However, some recently completed projects in Wellington and Auckland, supplemented with Australian information, indicate:

- New smaller vessels (~100 passengers) may cost in the low millions of dollars. The figure is higher for more complex vessels such as electric or hybrid-electric designs.
- New vessels with passenger capacity of around 200–300 may cost in the low tens of millions of dollars for conventional designs, with a premium for more complex or higher-specification vessels. For example, recently completed electric-hybrid commuter ferry projects of this scale in New Zealand have been reported at around $20 million per vessel.

Vessel level impacts are discussed further in Appendix 4.

Number and type of vessels impacted

Passenger ferries

Around 60 – 65 passenger ferries with more than 36 passengers are currently operating. Replacements to these vessels would need to meet the accessibility proposals. Most operate in urban centres, particularly in Auckland and Wellington (over two-thirds combined), where ferries form part of the public transport network.

This includes the Cook Strait ferry services between Wellington and Picton.

Overall:

- Around 20 vessels carry more than 36 but less than 100 passengers, typically operating as smaller ferries in the regions.
- Around 25 – 30 carry 100 to 300 passengers, mainly comprising mid-sized urban commuter vessels, but also including regional ferry services.
- Approximately 10 to 15 vessels carry more than 300 passengers, including the Cook Strait ferries and the largest Auckland ferries.

Tourist and scenic vessels

Around 25 tourist or scenic voyage vessels are currently operating. Replacements to these vessels would need to meet the accessibility proposals. Tourist or scenic vessels are generally medium-to-large capacity and can be broadly grouped as follows:

- Most carry 100–200 passengers, including all that operate in Abel Tasman, and most that operate in the Marlborough Sounds, Kaikoura, Fiordland and Queenstown.
- Around 7 carry 200 – 400+ passengers. These are concentrated in high-volume tourist destinations in

the South Island such as Milford Sound and Doubtful Sound.

Options analysis

Proposals are interdependent

Effective accessibility on passenger vessels depends on a range of features working together, including boarding, signage, accessible routes, and seating.

If any one of these elements is missing, the overall accessibility of the vessel for many passengers would be compromised. For this reason, the options below consider the individual accessibility elements as part of a cohesive interdependent package.

What options were considered

Four options were considered:

- **Option 1: Status quo**: Passenger vessels are not required to meet accessibility requirements.
- **Option 2: Voluntary Code of Practice**. Maritime NZ would work with the maritime sector and disability advocacy organisations to develop a Code of Practice. Operators would be able to adopt the Code and market their service as “accessible”.
- **Option 3: Retrofit**. Both new and existing vessels would be required to implement the proposed

accessibility measures. Owners or existing vessels would have a transition period to meet the new requirements – for example 5 years.

- **Option 4 (Preferred option): New vessels only.** Under this option only new ships would be required to be accessible. The fleet would gradually become more accessible as existing vessels are replaced over time.

How do the options compare against the status quo

The following criteria have been used to assess the options (refer to Table 1 for an assessment against these criteria):

Improves access and mobility	Option 2 (voluntary code) is likely to have a limited impact on accessibility, as uptake would depend on operator incentives and willingness to invest. Option 3 (all vessels) would have the potential to deliver the largest and fastest improvement, as it would apply across the existing fleet. However, if the changes are not financial viable, option 3 could also result in an overall reduction in access to transport. Option 4 (the preferred option) would deliver

	steady, long-term improvement over time through fleet renewal.
Provides flexible and adaptive regulation	Option 2 (voluntary code) would provide the greatest flexibility for owners and operators, but at the expense of consistency and certainty for users. Option 3 (retrofit) would be the least flexible as it would mandate changes to all vessels within a fixed timeframe. The changes may not be practicable for all vessels, and operators would have limited ability to respond to individual vessel constraints. Option 4 (new vessels only) provides a more balanced approach, enabling accessibility to be built into new designs while allowing operators to adapt over time through the vessel replacement cycle.
Changes are practical and economically viable	Compared with the status quo, options 2 to 4 would all increase costs to operators. Option 2 (voluntary code) comes at least cost as operators would

	determine the level of investment they make. The costs of retrofitting under option 3 would be high for most vessels. Operators would also lose revenue while vessels are out of service being retrofitted. Option 4 (new vessels only) is more cost-effective and practical, as accessibility would be incorporated at the design stage, where costs are relatively modest. If the vessel is purchased second hand, the new requirements could be considered as part of the purchase price.
Rules are clear and easier to understand and apply	Option 2 (voluntary code) would create uncertainty, as variable interpretations and application would make it difficult for users to know whether a particular service will meet their needs. Option 3 (retrofit) would introduce significant complexity, as applying new requirements to existing vessels with varied layouts and constraints would be challenging. Option 4 (new vessels only) provides a clear and consistent framework that is easier to understand and apply, by incorporating

	accessibility at the design stage or as part of vessel acquisition (including second-hand vessels).
Maritime Safety is maintained or enhanced	Options 2 to 4 each have the potential to improve safety compared with the status quo, as accessibility features make movement easier and can help speed evacuation for all passengers in an emergency. Option 2 (voluntary code) would deliver the least benefit due to lower uptake. Option 3 (retrofit) would have the greatest potential safety benefit, as more vessels would meet accessibility requirements, but could also result in fewer vessels operating. Option 4 (new vessels only) avoids these risks and allows accessibility features to be fully integrated into vessel design, supporting more consistent and cohesive safety outcomes

Under the status quo (Option 1), accessibility would remain underprovided, inconsistent, and often absent, as the underlying issues of hidden demand and weak market incentives would not be addressed.

A voluntary code of practice (Option 2) could support incremental improvements, but outcomes would depend on operator uptake and are likely to remain uneven.

A retrofit approach (Option 3) would deliver the most rapid and comprehensive improvement by applying requirements to both existing and new vessels, but may face practical and cost constraints that could limit feasibility.

Applying requirements to new vessels only (Option 4) would deliver steady improvements over time as the fleet is renewed, with fewer practical constraints than a retrofit approach.

Table 1: Assessment of Options against the criteria

	1. Status Quo	2: Voluntary Code	3. Retrofit	4. New vessels only
Improves access and mobility	0	0	++	+
Provides flexible and adaptive regulation	0	+	-	+
Rules that are clear and easier to	0	- -	-	+

understand and apply				
Maritime safety is maintained or enhanced	0	+	++	+
Changes are practical and economically viable	0	0	- -	+
Overall assessment	**0**	**0**	**-**	**+**

Preferred option

Option 4 is the preferred option. It would progressively improve accessibility over time as old vessels are replaced with accessible vessels and would provide a consistent and (eventually) a predictable minimum level of accessibility the passenger fleet.

Option 4 is preferred as it provides the best overall balance across the criteria compared to the other options:

- Although it delivers slower improvements in accessibility than Option 3 (retrofit), it avoids the high costs and practical constraints of retrofitting, making implementation more feasible for operators.

- It also offers greater regulatory flexibility, allowing accessibility to be incorporated into new vessel designs while existing vessels are replaced naturally over time.
- Compared to Option 2 (voluntary code), it would provide clearer, more consistent requirements and more certain outcomes for users, and would avoid the variability of voluntary uptake.
- Importantly, Option 4 also supports stronger safety outcomes by enabling accessibility features to be fully integrated into vessel design rather than retrofitted

What are the marginal costs and benefits of the preferred option?

Table 2: Marginal costs and benefits of accessibility requirements

Affected groups	Comment	Impact	Evidence Certainty
Additional costs of the preferred option compared to taking no action			
Owners / operators	Increased capital costs for new vessels of incorporating	Low to moderate – typically around 1% - 5% of build	Medium

	accessibility features	costs for most vessels, depending on size and design complexity.	
Owners / operators	Potential reduction in seating capacity and revenue due to space allocation for accessibility features	Low if impacts are mitigated through optimal design and use of multi-space options (e.g. flip-up seating), medium if not.	Medium

Affected groups	**Comment**	**Impact**	**Evidence Certainty**
Additional benefits of the preferred option compared to taking no action			
Owners and operators	Increased patronage from disabled travellers and accompanying passengers,	Low initially but growing as the overall passenger vessel	Medium – supported by consistent qualitative and international

	expanding the customer base over time.	network becomes more accessible.	evidence, but limited New Zealand specific examples.
Disabled passengers and others with access needs	Improved access to ferry services, including ability to board, move around, and use facilities independently and with dignity. Reduces exclusion and unmet travel demand.	High – removes a barrier to travel and enables trips that would not otherwise occur.	Medium – strong qualitative evidence (domestic and international) on transport barriers and their impact.
Disabled passengers and others with access needs	Greater ability to access employment, healthcare, education, and social activities due to improved transport availability.	High – significant impacts on wellbeing and participation.	Medium – good evidence for travel generally but less specific to New Zealand passenger vessels.

Passengers in general	Improved usability and comfort for all passengers (e.g. clearer layouts, safer movement, better signage).	Low.	Low – absence of quantitative evidence.
Passengers in general	Improved safety for all passengers through better layouts, clearer communication, and easier evacuation in emergencies.	Low to medium.	Low to medium - supported by general safety principles, but subject to uncertainty as dependent on vessel design.

Appendix 1: ‘Snapshot’ of the proposed Accessibility Rules

Main changes	What would change	Rule reference
Application	The rules relating to disability access would apply to new vessels which are: - passenger ferries certified to carry 36 passengers or more, or - pre-booked tourism or scenic passenger services certified to carry more than 100 passengers.	Rule A1.3(4)

Main changes	What would change	Rule reference
Signage	Signage must identify accessible entrances, accessible routes, accessible toilets, priority seating (including with disability assistance animals), and allocated spaces for wheelchairs, stairs, and lifts. Signs must comply with Accessible Signage Guidelines and include large print, high contrast tactile print, and braille. Signs must be consistent throughout the vessel and use universally recognised symbols and icons.	Rules C5.2(2) and (3) MTI 5.2(1) and (2)
Visual aids	Doors, signs, counters, stairs, and other artificially lit areas must be well illuminated. Handrails, steps, ramps and coamings, priority seating handholds, door handles, and accessible toilet fittings must be in colours that contrast with their background. Contrasting colours must be used consistently throughout the vessel.	Rules C5.2(4) and (5) MTI 5.2(3) and (4)

Main changes	What would change	Rule reference
Other aids	Vessels carrying more than 100 passengers must have a hearing-aid loop for on board announcements and television screens that broadcast safety messages visually with subtitles or sign language.	Rule C5.2(6) MTI 5.2(5)

Main changes	What would change	Rule reference
Boarding and disembarking	At least once access to the ship must be via a gangway ramp. The gangway ramp must have an even gradient, a slip-resistant surface, an upstand or kerb on each side of at least 75 mm height, and handrails between 840 and 900mm in height. Gangways must not have a gradient greater than 1:12, except where tides and/or land-based infrastructure does not allow. Where tides and/or land-based infrastructure prevents some people's ability to board, or limits it to certain times, passengers should be notified at the earliest opportunity. Door sills on the entrance must not be greater than 20mm in height. If not practicable, "drop in sills", "roll over sills" or similar solutions may be used to ensure there is no abrupt change in level greater than 20mm.	Rule C5.3 MTI 5.3

Main changes	What would change	Rule reference
Accessible routes	There must be an accessible route between the embarkation/disembarkation point, priority seating and seating allocated for people using wheelchairs, and accessible toilets. The route must have a minimum clear width of 850 mm and be well illuminated by day and night. The route must not have an abrupt change in level of more than 20mm or a gradient greater than 1:12. Turning points must have dimensions and clear space sufficient for the user of a standard wheelchair to manoeuvre through the turn without assistance. Doors must be designed for people with limited dexterity and operable with one hand.	Rule C5.5 MTI 5.5(1) – (3), (9) and (10)

Priority seating	All seating must be 450mm wide and 450mm high with a minimum distance between seat rows of 750 mm (from seat front to seat front). Priority seating must be vacated when needed by passengers with disabilities or in need of special assistance. Four priority seats must be provided for the first 50 passengers and two additional seats must be provided for every additional 50 passengers or part thereof. Priority seating must be as close as possible to entry and exit doorways and in a location that enables occupants to view any safety information screens and have good access to sound supports and other aides. Their position must not place the occupants at a disadvantage in terms of comfort or amenities than general passengers seating. Priority seating must have suitable handholds that enable a person to support themselves when sitting down or getting up.	Rules C5.6(1) – (4) MTI 5.6(1) and (2)

Main changes	What would change	Rule reference
	Signage must be visible stating that priority seating must be vacated for passengers with disabilities or in need of special assistance.	

Main changes	What would change	Rule reference
Allocated spaces for users of wheelchairs of other mobility devices	There must be at least two allocated spaces for users of wheelchairs or other mobility devices for the first 37 passengers, and one additional space for every 50 additional passengers or part thereof. Allocated spaces must have minimum dimensions of 1300mm by 800mm. The dimensions of the allocated spaces and adjacent areas must be sufficient for a person in a standard wheelchair to manoeuvre into and out of the space unassisted. A clear turning circle with 1925mm diameter must be provided at or adjacent to allocated spaces. Allocated spaces must be on the same level as the level of boarding and be located as close as possible to the entry and exit doorways. Occupants must be able to view any safety information screens and have good access to sound supports and other aides. Their position must not place the occupants at a disadvantage in terms of comfort or amenities than general passengers seating.	Rule C5.7 MTI 5.7(1) – (3)

Main changes	What would change	Rule reference
Stairs	Doors must not open directly across the top flight of stairs or obstruct the top or bottom steps. Steps must be of uniform height and have non-slip surfaces. Steps must have handrails on both sides and, where the stairway is more than 1500mm wide, a centre line dividing handrail. Tactile ground surface indicator warnings must be provided at the top and bottom of each flight of steps. Stairs must be well illuminated day and night.	Rule C5.8 MTI 5.8

Main changes	What would change	Rule reference
Accessible toilets	Every vessel with more than 50 passengers must have at least one accessible toilet. The accessible toilet must be available for use by anyone and able to be reached by an accessible route without going through an area reserved for one gender. The accessible toilet must be well-lit, have doors that either open outwards or slide sideways, and offer privacy for each compartment. The internal dimensions of the toilet compartment must be at least 1900mm by 1600mm and the toilet and washbasin must meet certain dimensional specifications.	Rule C5.9 MTI 5.9(2) – (14)

Appendix 2: Examples of passenger ferry accessibility in other jurisdictions

Non-discrimination frameworks

Many jurisdictions address accessibility primarily through general non-discrimination frameworks rather than explicit vessel design requirements. These frameworks require operators to ensure that disabled passengers can access transport services on an equitable basis, including by providing assistance or making reasonable adjustments where practicable.

This approach focuses on the outcomes that must be achieved in practice, rather than prescribing how vessels must be designed to deliver those outcomes. Operators may rely on a combination of vessel design, operational arrangements, and crew assistance to meet their obligations. While this can enable flexibility and incremental improvements, it may also result in variability in accessibility outcomes between vessels and services.

In the United States, for example, the Americans with Disabilities Act establishes outcome-based requirements for passenger vessel operators. These include ensuring that disabled passengers can board and disembark,

access and use onboard facilities (such as seating areas and toilets), and receive safety information in formats that are accessible to people with vision or hearing impairments. The legislation defines the level of access that must be provided but does not prescribe detailed vessel design standards to achieve this.

Table 3: Jurisdictions using non-discriminatory frameworks

Jurisdiction	Approach	Coverage and limits
European Union	Passenger rights regulation (EU 1177/2010)	Applies to ferries and cruise ships, but excludes vessels with ≤12 passengers, ≤3 crew, routes <500 m, and some sightseeing services.[14]
United Kingdom	EU passenger rights followed	Similar to EU; physical changes to vessels are limited and

[14] Regulation (EU) No 1177/2010.

		subject to safety and feasibility.[15]
Norway	EU-aligned passenger rights (EEA)	Applies to vessels with >12 passengers, >3 crew, journeys >500 m.[16]
United States	ADA non-discrimination rules	Applies broadly to operators; allows limits based on safety and operational constraints[17]

Vessel design frameworks

Other jurisdictions set requirements for the design and layout of vessels themselves, recognising that accessibility is most effective when it is built into vessels from the outset. They typically focus on features such as:

[15] Regulation (EU) No. 1177/2010 (as retained in UK law) and the Equality Act 2010.

[16] Regulation (EU) No 1177/2010 as incorporated into the European Economic Area (EEA) Agreement, as implemented in Norwegian law.

[17] Implemented through 49 CFR Parts 37 and 38) and U.S. Access Board Passenger Vessel Accessibility Guidelines (PVAG).

- boarding arrangements
- accessible routes
- seating and space for mobility devices
- toilets and onboard facilities

Requirements vary in how prescriptive they are. Some are set out in legislation or standards, while others use codes of practice or technical guidance.

Australia has the most prescriptive vessel design framework. The Disability Standards for Accessible Public Transport sets detailed, mandatory technical requirements (including dimensional requirements and performance criteria) for a wide range of features such as boarding, accessible routes, seating, and toilets. These apply to new vessels, with existing fleets subject to staged compliance over time and an ongoing obligation to provide equivalent access where strict compliance for existing vessels is not practicable.

Table 4: Regulatory frameworks in other jurisdictions

Jurisdiction	Approach	Coverage and limits
Australia	Disability Standards for Accessible Public Transport (DSAPT)	Detailed technical requirements for vessels; new vessels must

		comply, with staged upgrades for existing fleets[18]
Canada	Ferry accessibility standards and regulations	Applies to ferries ≥1,000 gross tonnes on major routes; includes design expectations for layout, signage, corridors, and facilities[19]
Japan	Barrier-Free Act and supporting guidance	Promotes barrier-free design across transport systems, including passenger vessels, supported by technical guidance on

[18] Disability Standards for Accessible Public Transport 2002 (DSAPT) made under the Disability Discrimination Act 1992.
[19] Accessible Transportation for Persons with Disabilities Regulations (ATPDR) (SOR/2019-244) under the Canada Transportation Act.

		layout and access[20]
International (IMO / UNECE)	Design guidance for passenger ships	Non-binding guidelines covering layout, routes, and facilities for persons with reduced mobility.[21, 22]

[20] Barrier-Free Act (Act on Promotion of Smooth Transportation of Elderly Persons, Disabled Persons, etc., Act No. 91 of 2006), supported by MLIT “Passenger Ship Barrier-Free Guidelines”.

[21] IMO Circular MSC.1/Circ.735 (as amended)

[22] UNECE, Guidelines on Accessible Transport Infrastructure and Services for Persons with Reduced Mobility.

Appendix 3: Benefits of accessibility requirements

Accessibility requirements for passenger vessels create a range of social and economic benefits by improving the ability of disabled people and others with access needs[23] to use maritime transport.

Increased access and participation

The main benefit of improved access to ferry services for disabled people and others who experience barriers to transport is that trips occur which would otherwise be foregone, rather than simply improving convenience (although this is also important).

This can lead to improved access to:

- Health care
- Education
- Social activities.

These benefits are greatest where passenger vessels form part of essential or time efficient transport routes.

We estimate that passenger vessel services likely to be affected by these proposals carry approximately nine million passenger trips annually. Disabled people

[23] This includes older people, those with temporary injuries and carers.

experience significantly greater transport barriers than non-disabled people, and around one in five disabled people do not use public transport because of disability.

Based on indicative assumptions regarding disability prevalence and the extent to which accessibility barriers suppress travel, improved accessibility and greater consistency across the passenger vessel sector could enable approximately 50,000 to 100,000 (central estimate 85,000) additional passenger trips annually by disabled people and others travelling with them. These estimates are uncertain and are intended to illustrate the potential scale of benefits rather than predict a precise outcome

We are particularly interested in hearing from disabled people, disability organisations, carers and support people about whether accessibility barriers, or uncertainty regarding accessibility, affect decisions to travel.

Improved service quality for all passengers

Accessibility features can improve usability for passengers generally through:

- Wider and clearer routes improving movement throughout the vessel

- Better signage and communication systems supporting navigation and understanding
- Access to accessible toilets, which can be more convenient for a range of users.

As a result, accessibility requirements often deliver wider service quality improvements that benefit all passengers, not just disabled people or those with specific access needs.

Safety and operational benefits

Accessibility features can also improve safety and operational outcomes for all passengers, not just those with disabilities:

- Markings in contrasting colours for features such as handrails, stairs, and handholds improve visibility and reduce the likelihood of accidents
- Clearer routes and better layout support safer movement around the vessel, particularly in emergency evacuation scenarios
- Improved communication systems enhance the delivery and understanding of safety information.

Increased patronage and revenue

General

Improved accessibility can increase uptake of passenger vessel services and revenue by enabling use by:

- Disabled people who would otherwise be unable to use them
- Passengers accompanying them, including family members, carers, and friends
- Other passengers who benefit from easier and more reliable access.

Tourism

Internationally, disabled people and older travellers represent a significant and growing proportion of tourists. As new vessels are introduced with accessibility features, the overall fleet will progressively become more accessible, and accessibility will become more consistent and predictable.

This may:

- Attract a wider range of domestic and international visitors
- Support longer and higher-value trips
- Improve the attractiveness of destinations reliant on vessel access.

This has benefits not only for individual operators through increased patronage, but for the tourism sector more broadly.

Research also suggests that accessibility and the reliable communication of accessibility information influence travel decisions. Travellers with access needs are more likely to travel where accessible experiences are consistently provided and clearly communicated. Tourism and sightseeing services may therefore experience particular benefits from improved accessibility, as these trips are often discretionary and travellers have a wider range of alternative destinations and activities available.[24]

Uncertainty and limitations

Benefits are more difficult to quantify than costs. This reflects:

- The indirect nature of many benefits (e.g. access to employment or healthcare)
- suppressed demand where barriers already exist
- limited data on current use of passenger vessels by disabled people.

[24] Cockburn-Wootten, C., & McIntosh, A. (2020), Improving the Accessibility of the Tourism Industry in New Zealand, Sustainability, 12(24), 10478.

While precise quantification is limited, the direction and significance of the benefits are well established.

Appendix 4: Costs of accessibility requirements

Introduction

Detailed analysis of the costs of accessibility requirements for passenger vessels is limited. The most comprehensive evidence comes from United States studies estimating the cost of implementing the Americans with Disabilities Act. This is supplemented by more recent Australian regulatory analysis undertaken as part of the review of the Disability Standards for Accessible Public Transport.

Key findings from these studies are broadly consistent with international case studies and industry commentary on accessible vessel builds, although those sources typically provide less detailed cost breakdowns.

Main cost drivers

Across the available evidence, the primary cost drivers are features that affect vessel layout and space.

These include:

- **Wider routes and doorways:** requirements for accessible routes can be a significant driver of cost.

- **Allocated spaces for mobility devices:** providing sufficient space for wheelchair users and turning circles is often a major layout constraint.
- **Accessible sanitary facilities:** accessible toilets are consistently identified as one of the largest individual cost items, generally requiring significantly more space than standard cubicles.
- **Lifts and vertical access:** where accessibility is required across multiple decks, lifts can become a major cost driver, requiring dedicated space, equipment, installation, and sometimes structural or stability adjustments.

These features drive costs because they:

- Displace passenger space, which reduces carrying capacity and revenue potential; or
- Require larger vessels, which increases both construction costs and ongoing operating costs.

Lower-cost items

- The cost impact of some accessibility features are relatively low. Signage, accessibility markings, communication systems, and other fittings are generally identified as minor cost components compared to features that affect space, circulation, or structure.

Typical overall cost impacts (international evidence)

- The United States Access Board analysis, supported by earlier work undertaken by the Volpe National Transportation Systems Center, provides the most comprehensive available cost estimates.

These studies distinguish between new construction, and alterations (retrofit), reflecting the different engineering constraints involved.

The findings indicate that:

- Costs for new vessels are generally modest, typically in the range of 1% to 5% of total construction cost, with higher values for more complex vessels requiring vertical access.
- Retrofit costs are consistently higher and more variable, typically in the range of 3% to 15% of vessel value, and in some cases higher where significant structural modification is required.

Estimating the cost of the proposals

Approach

We have estimated the costs of our proposals in four steps:

- **Step 1:** Use the US Access Board study as a baseline for cost increases (as a percentage of vessel cost).[25]
- **Step 2:** Identify the contribution of individual cost components (e.g. circulation, toilets, doors, signage).
- **Step 3:** Adjust those components to reflect differences between the US assumptions and the proposed New Zealand requirements.
- **Step 4:** Aggregate the adjusted components and extrapolate across vessel sizes.

Key cost reductions relative to US estimates

The analysis identified several features of the proposal that reduce costs relative to the US baseline, primarily by reducing space requirements:

- **Accessible toilet replaces two standard cubicles:** this significantly reduces the net space impact of providing an accessible toilet.
- **Accessible route requirements interact with existing NZ rules:** Route widths are slightly narrower than in the US model, and existing egress requirements already provide substantial width, reducing additional space requirements.

[25] Excluding complex approaches and vessels that are not applicable.

- **Use of flexible (fold-up) seating:** allows spaces for wheelchair users to be used by other passengers when not required, reducing effective space loss.
- **Single-level accessibility (no lifts required in most cases)**: avoids one of the largest cost drivers in international models.
- **Flexible approach to doors and fittings:** Allows compliance without requiring high-cost prescribed solutions such as automatic sliding doors.

Taken together, these features mean that accessibility requirements can generally be accommodated within the existing design envelope, rather than requiring larger vessels.

Limitations and assumptions

Our cost estimates below assume that spaces allocated for wheelchair users and mobility devices can be used by other passengers when not required, and that space saving features such as flip-up or fold-down seating are integrated at the design stage to minimise displaced seating.[26]

In practice, the degree to which seating capacity is maintained may vary depending on factors such as vessel design, operational considerations and operator

[26] This is already widely used in urban buses and trains in New Zealand.

preferences. Designs that make limited use of flexible or multi-use spaces are likely to sit toward the upper end of the estimated cost impact ranges and potentially above it.

The estimates also assume that accessibility can generally be achieved within a single passenger deck, without the need for vertical access (e.g. lifts). This reflects the design of most New Zealand passenger vessels, where single-level accessibility is typically practicable.

For some larger, multi-deck vessels (such as certain Cook Strait ferries) lifts are already provided (status quo). If lifts are included for larger vessels and treated as not being the status quo they could increase costs by around 0.5 – 1% depending on vessel design.

Estimated costs under the proposal

Results for new vessels, with incremental cost of being accessible as a proportion of construction costs, are in Table X, below.

Table 5: Estimated new build cost of accessibility features (% of build cost)[27]

Number of passengers	37–50	51–100	100–300	301–499	500+

[27] Estimates are indicative and reflect a range of design outcomes.

Low	0.6%	0.8%	1.5%	2.3%	2.6%
Central estimate	0.8%	1.3%	2.3%	3.0%	3.2%
High	1.2%	2.0%	3.2%	3.8%	4.2%

Perhaps counter-intuitively, costs as a proportion of total build increase gradually with vessel size. Smaller vessels typically have simple open layouts where accessibility can be achieved primarily through reconfiguration of seating. In contrast, larger vessels need to integrate a greater number and distribution of accessibility features within larger, more spread out vessel layouts.

Comparison with existing vessels (retrofit)

The cost of retrofitting existing vessels is significantly more than for new vessels (Table 6, below).

Retrofits are constrained by existing features, including vessel structure, layout, and internal systems. Working within these to achieve accessibility, or altering them, can become much more costly, particularly for complex vessels.

Table 6: Indicative costs of retrofitting accessibility in existing vessels

Number of passengers	37 - 50	51 - 100	100 – 300	301 – 499	500+
Retrofit cost impact	7.0%	7.0%	13.0%	16.0%	18.0%+

Overall:

- For new vessels, accessibility can be integrated into the design with relatively modest cost impacts.
- For existing vessels, the same requirements must be fitted into constrained layouts, resulting in higher and more variable costs.

Retrofit costs are therefore typically two to four times higher than new build costs, depending on vessel type.

This reflects a broader principle across transport and infrastructure: accessibility is most efficiently achieved when incorporated at the design stage.

Uncertainty and limitations

These estimates are indicative and based on international evidence adjusted to reflect New Zealand conditions and the scope of the proposed requirements.

Actual costs will vary depending on:

- Vessel size and design

- Operating environment
- Layout efficiency
- Shipbuilding and retrofit market conditions

There are also differences between the international evidence base and the New Zealand context, including fleet size and variability in vessel design.

However, these factors do not affect the overall conclusion that accessibility costs are relatively low at the design stage and materially higher when applied to existing vessels.