

Proposed Changes to Maritime Rules: Design, Construction and Equipment Rules Reform

Consultation Package 3

Section 1 Introduction

We would like to hear your feedback on the proposed changes to the existing Design, Construction and Equipment rules.

We encourage you to review the consultation material outlined below and share your feedback via one of the following methods:

- Completion of this submission form or in any other written form. See page 66 of this form for details on how to send us your written submission.
- Attendance at a Maritime NZ online information session during the weeks of 17 – 21 August and 7 – 11 September. Contact us at 40.series@maritimenz.govt.nz if you would like to attend a session.
- Verbally on request. Contact us at 40.series@maritimenz.govt.nz if you would like us to contact you to discuss the proposals.

The submission deadline is **5pm, Friday 25 September 2026**.

Consultation material

The consultation material consists of the following series of documents:

- *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 four Rule topics being consulted on: Survey and Certification; Lifting Appliances, Loose Gear, and Working Gear; Accommodation, Access, Escape, and Personal Safety; and Navigation Systems and Equipment.
- *Draft Maritime Rules and draft Maritime Transport Instruments (MTIs)* – a set of rules and MTIs for each of the four Rule topics.

All documents can be accessed at <https://www.maritimenz.govt.nz/about-us/consultations/dce-40-series-package-3>

Section 2 Your details

Name

Email

Organisation
(if applicable)

Position
(if applicable)

Questions and feedback

Section 3 Questions about the general approach

In addition to the specific questions outlined in the following sections, you may also wish to comment on the following overview questions:

General approach

G 1 Do you have any comments about the general approach to reforming the DCE rules? (For example, harmonising and consolidating requirements across vessel types, basing requirements on risk, putting detailed requirements in MTIs, grandparenting of some requirements?)

Section 4 Survey and Certification Questions

Part A:	The framework for the proposed new survey and certification requirements
Part B:	Proposed changes to the requirements for survey and certification
Proposal 1:	Grandparenting and transitional provisions for vessels already in New Zealand's fleet
Proposal 2:	The application of new rules to vessels entering New Zealand's commercial fleet after new rules come into effect
Proposal 3:	Approving a vessel's design and verifying its construction
Proposal 4:	Major alterations and major operational changes
Proposal 5:	Undertaking a survey remotely in specified circumstances

For information on these specific proposals refer to:

- Pages 15 and 16 of the *Invitation to Comment* document
- Part 1A: Survey and Certification proposal summary

Part A: The framework for the proposed new survey and certification requirements

SC Part A1.1 Do you agree that future work should consider a risk-based approach to survey frequency? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part A1.2 Do you agree that consolidating the majority of the survey and certification requirements into a single Rule and MTI would improve clarity and usability? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part A1.3 Do you agree that the proposed survey types, triggers, and lifecycle approach (including new terms like “intermediate” and “non-scheduled” surveys) are clear and workable in practice? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Part B: Proposed changes to the requirements for survey and certification

Proposal 1: When the new DCE rules come into effect, grandparenting and transitional provisions would apply to vessels already in New Zealand's commercial fleet

SC Part B1.1 Do you agree with the proposed use of grandparenting and transitional provisions to manage the impacts on vessels that are already in the commercial fleet prior to the commencement of the rules (Option 3)? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B1.2 Does the proposal strike the right balance between improving safety and managing practical and economic impacts? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B1.3 Are the proposed transitional timeframes sufficient and workable for implementing the required changes? Why /why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B1.4 Are there any situations where the proposed use of grandparenting or transitional provisions could create safety risks or unintended consequences?

SC Part B1.5 What challenges do you foresee in applying the proposed approach (e.g., identifying applicable requirements, demonstrating compliance, or undergoing surveys)?

Proposal 2: The application of the new DCE rules to vessels entering the New Zealand commercial fleet after new rules come into effect

SC Part B2.1 Do you agree with allowing eligible AMSA and Class certified vessels to comply with their existing certification requirements in certain situations? (Option 3) Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B2.2 Do you agree that AMSA and Class requirements provide comparable safety outcomes to New Zealand rules in the situations where grandparenting provisions are proposed? (refer Appendix 1) Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B2.3 How workable is this proposal in practice, particularly in demonstrating and verifying compliance with AMSA or Class requirements during survey and certification?

SC Part B2.4 Is the proposed 10-year limit on access to these allowances appropriate? What impacts would this have on vessel investment and entry decisions?

SC Part B2.5 To what extent would this proposal reduce costs (e.g., upgrades, alterations, exemptions), and are there any unintended costs or barriers it could create?

Proposal 3: Approving a vessel's design and verifying its construction

SC Part B3.1 Do you agree with the overall approach of clarifying the requirements for approving a vessel's design and verifying its construction? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B3.2 Is the proposed approach to allow the use of AMSA and Class documentation clear and appropriate? Do you anticipate any issues with access to, or quality of, AMSA or Class documentation? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B3.3 Do you agree with the proposal to introduce an alternative pathway to verify construction that could be used for vessels that were not constructed under survey? If so,

- **In what situations would this be appropriate or inappropriate?**
- **How would the proposed changes affect current practices for fishing and sailing vessels that undertake structural surveys to verify construction?**

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B3.4 Do you agree with increasing the length threshold from “less than 7.5 metres LOA” to “less than 12 metres LOA” for series production vessels? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B3.5 Do you agree with the proposed requirement that, in order to use existing documentation from a series production prototype or a lead sister ship, its design needs to be approved and construction verified (for series production prototype only) within the previous 5 years? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B3.6 Do you agree that a surveyor should be able consider verified documentation, to be specified in the MTI, from the European Recreational Craft Directive 2013/53/EU, when approving a vessel's design or verifying its construction? If so, should other constraints be imposed on the use of this information, for example, the size of the vessel? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 4: Defining what a major alteration or major operational change is and specifying the standards and survey requirements that would be required as a result of the change

SC Part B4.1 Are the proposed definitions of “major alteration” and “major change to a ship’s operation” clear and workable in practice? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B4.2 Do the detailed descriptions of the different changes, listed in Appendix 2, appropriately capture the types of changes that should trigger additional scrutiny? Are any key examples missing or unnecessary? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B4.3 Do you support the proposed risk-based approach that provide surveyors with discretion? Do you think this will lead to consistent decision-making? Why / why not?

SC Part B4.4 Is the approach of requiring upgrades only for areas directly or indirectly impacted by a change appropriate and practical to apply? Why / why not?

SC Part B4.5 What impacts (cost, time, or operational) do you expect from this proposal, particularly in the short term versus longer term?

Proposal 5: Undertaking aspects of a survey remotely

SC Part B5.1 Do you agree with only allowing surveys to be undertaken remotely when they are a follow up to an in-person survey? Why / why not?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B5.2 If you agree with question B5.1, do you agree that the proposed safeguards in place for remote surveys are sufficient to maintain safety? Why / why not?

Note: the proposal includes safeguards, including that it would not be able to be used as part of an initial survey, it can only be used following an in-person survey, and a surveyor must be satisfied if the same level of assurance could be achieved. In addition, any matters confirmed as compliant through a remotely conducted survey would need to be identified in the survey report and reviewed by a surveyor in person at the next survey.

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

SC Part B5.3 How workable is the proposal in practice, particularly for verifying compliance remotely and using available technology? What challenges (if any) do you foresee for operators or surveyors?

Section 5 Lifting Appliances, Loose Gear, and Working Gear Questions

- Proposal 1:** Reduced examination requirements for “small and simple” lifting appliances
- Proposal 2:** Clarifying survey requirements for lifting appliances, loose gear and working gear
- Proposal 3:** More detailed requirements for maintenance and inspection of steel wire rope
- Proposal 4:** Requirements for testing, inspection, examination, inspection, and record keeping for lifting appliances and working gear on fishing and marine farming vessels
- Proposal 5:** Clarifying requirements for undertaking inspection, maintenance, deployment and retrieval activities using a lifting device

For information on these specific proposals refer to:

- Page 17 of the *Invitation to Comment* document
- Part 3A: Lifting Appliances, Loose Gear, and Working Gear proposal summary

Proposal 1: Reduced examination requirements for “small and simple” lifting appliances

L 1.1 Do you agree with the proposed change to allow lifting appliances, that are ‘small and simple’ (non-luffing and non-extendable with a SWL less than 300 kg), to be inspected annually by a responsible person, and examined 5-yearly, rather than annually by a competent person?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

L 1.2 Are there any types of lifting appliances under 300 kg that you think should still require annual examination by a competent person? Please explain.

☐ Yes ☐ No ☐ Don't know ☐ No comment

Proposal 2: Clarifying survey requirements for lifting appliances, loose gear and working gear

L 2.1 Do you agree with better defining surveyor oversight requirements for lifting appliance, loose gear and working gear?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

L 2.2 Are any of the proposed survey checks unclear, unnecessary, or missing? Please provide examples.

☐ Yes ☐ No ☐ Don't know ☐ No comment

Proposal 3: More detailed requirements for maintenance and inspection of steel wire rope

L 3.1 Do you agree with introducing more detailed requirements for inspecting and maintaining steel wire rope?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

L 3.2 How practical would it be for crew to carry out the proposed visual inspections before use?

L 3.3 Is reliance on manufacturer guidance or ISO 4309:2017 appropriate? If not, what alternative approach would you suggest?

☐ Yes ☐ No ☐ Don't know ☐ No comment

Why / why not?

Proposal 4: Requirements for testing, inspection, examination, inspection, and record keeping for lifting appliances and working gear on fishing and marine farming vessels

L 4.1 Do you agree with the proposed requirement for regular inspection, examination, and record keeping for working gear on fishing and marine farming vessels?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

L 4.2 What costs or operational impacts would these new requirements create for your vessel or business (e.g. time, training, use of competent persons)?

L 4.3 Are there any aspects of working gear (e.g. types of equipment, inspection frequency, record keeping) where the proposed requirements are unclear or impractical?

☐ Yes ☐ No ☐ Don't know ☐ No comment

Proposal 5: Clarifying requirements for undertaking inspection, maintenance, deployment and retrieval activities using a lifting device

L 5.1 Do you agree with how the proposed rules classify lifting activities based on risk?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

L 5.2 Would the clarified rules change how your vessel or operation currently manages lifting devices?

☐ Yes ☐ No ☐ Don't know ☐ No comment

Why / why not?

L 5.3 Are there any activities (e.g. scientific, mooring, aquaculture inspection) where it remains unclear which rules should apply? Please provide examples.

☐ Yes ☐ No ☐ Don't know ☐ No comment

Section 6 Accommodation, Access, Escape, and Personal Safety Questions

- Proposal 1:** Thresholds for toilet crews and wash basins
- Proposal 2:** Thresholds for crew accommodation (excluding toilets and washbasins)
- Proposal 3:** Heights of safety barriers on passenger vessels
- Proposal 4:** Lower or no safety barriers if normal operations would be impeded
- Proposal 5:** Measures to protect children from falling
- Proposal 6:** Harmonisation of personal safety requirements
- Proposal 7:** Means of escape and watertight doors
- Proposal 8:** Exceptions to requirements to have two means of escape
- Proposal 9:** Number and type of means of access and escape
- Proposal 10:** Capacity and dimensions of means of access and escape

For information on these specific proposals refer to:

- Pages 17 and 18 of the *Invitation to Comment* document
- Part 3I: Accommodation, Access, Escape, and Personal Safety proposal summary

Proposal 1: Thresholds for toilet crews and wash basins

A 1.1 Do you agree that four hours should be the threshold for when crew toilets should be required?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 1.2 Are there any other factors that should affect when crew toilets should be required? Please explain.

☐ Yes ☐ No ☐ Don't know ☐ No comment

A 1.3 Are there vessel types, operating profiles, or circumstances where this threshold would be impractical or inappropriate? Please explain.

☐ Yes ☐ No ☐ Don't know ☐ No comment

Why / why not?

Proposal 2: Thresholds for crew accommodation (excluding toilets and washbasins)

A 2.1 Do you agree that voyages of 24 hours or more should be the threshold for when crew accommodation (excluding toilets and washbasins) should be required?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 2.2 Are there other factors (such as crew size, work patterns, or operating area) that should be considered when determining when crew accommodation is required? Why?

A 2.3 Are there vessel types that should have different thresholds? Why?

Proposal 3: Heights of safety barriers on passenger vessels

A 3.1 Do you agree with introducing a minimum safety-barrier height of one metre for new passenger vessels?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 3.2 Do you agree that the proposed exceptions for smaller vessels in enclosed waters are appropriate, or should the criteria for allowing lower barriers be changed?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 4: Lower or no safety barriers if normal operations would be impeded

A 4.1 Do you agree with the proposed framework for allowing lower or no safety barriers where normal vessel operations would be impeded?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 4.2 Do you agree that the proposed alternative safety measures and documentation requirements are sufficient to provide confidence that risks are being appropriately managed?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 5: Measures to protect children from falling

A 5.1 Do you agree that additional safety-barrier measures are needed to reduce risks of children on passenger vessels falling or being swept overboard?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 6: Harmonisation of personal safety requirements

A 6.1 Do you agree with harmonising personal safety requirements across vessel types for new vessels?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 6.2 Are there specific vessel types or operating contexts where retaining different requirements would be justified on safety or operational grounds?

☐ Yes ☐ No ☐ It depends

Which vessels and why?

A 6.3 Are there vessel types, sizes, or characteristics that taut wire is not suitable to use as a safety barrier?

☐ Yes ☐ No ☐ It depends

Which vessels and why?

Proposal 7: Means of escape and watertight doors

A 7.1 Do you agree that new ships should not have both means of escape from a space being through a watertight door?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 7.2 Are the proposed exception criteria for existing vessels appropriate and workable in practice? If not, what changes would you suggest?

☐ Yes ☐ No ☐ It depends

Why / why not?

A 7.3 Are you aware of operators who have other practices in place to mitigate escape risks associated with watertight doors? How effective are these?

Proposal 8: Exceptions to requirements to have two means of escape

A 8.1 Do you agree with replacing multiple vessel-specific exceptions with a single, risk-based framework for when a second means of escape is not required?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 8.2 Are the proposed exception criteria appropriate and workable in practice for existing vessels? Are there situations where the criteria would not work?

Why / why not?

Proposal 9: Number and type of means of access and escape

A 9.1 Do you agree with distinguishing between a primary means of access and an alternative means of escape?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 9.1 Do you agree that the proposed requirements appropriately differentiate between accommodation spaces and operational workspaces?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 9.3 Do you think that there are some vessel types that should have different access and escape requirements? Which vessels and why?

A 9.4 For existing vessels, do you consider the proposed requirements for means of access and escape to be generally achievable without having to make significant changes?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 10: Capacity and dimensions of means of access and escape

A 10.1 Do you agree with applying the existing dimensional standards for passenger accommodation to other new vessels?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

A 10.2 Are there vessel types or layouts where the proposed dimensional requirements would be difficult to apply in practice, even at the design stage?

☐ Yes ☐ No ☐ Possibly

Why / why not?

A 10.3 Do you agree with the proposed approach of allowing surveyor discretion for existing vessels?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Section 7 Accessibility Questions

Proposal 1: Which vessels the proposed accessibility requirements would apply to

Proposal 2: Boarding and disembarking

Proposal 3: Signs and communication

Proposal 4: Accessible routes

Proposal 5: Stairways

Proposal 6: Priority seating and spaces for mobility devices

Proposal 7: Accessible toilets

Proposal 8: Disability assistance animals

For information on these specific proposals refer to:

- Page 18 of the *Invitation to Comment* document
- Part 3I, Section 5: Accessibility proposal summary

Proposal 1: Which vessels the proposed accessibility requirements would apply to

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

☐ Yes ☐ No

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

Proposal 2: Boarding and disembarking

A 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?

☐ Very easy ☐ Easy ☐ Moderately Easy ☐ Difficult ☐ Very Difficult ☐ Impossible

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

A 7 What challenges might arise in implementing these requirements across different vessel types or operating environments? What could help to address this?

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

☐ Yes ☐ No

Proposal 3: Signs and communication

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No

Why / why not?

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

☐ Yes ☐ No

What are they? How would they help?

Proposal 4: Accessible routes

A 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)?

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No

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

☐ Yes ☐ No ☐ It depends

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

Proposal 5: Stairways

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

Proposal 6: Priority seating and spaces for mobility devices

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No

Why / why not?

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

Please explain the impacts and whether they are manageable

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

☐ Yes ☐ No ☐ Partially

Why / why not?

Proposal 7: Accessible toilets

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

A 257 **Are there alternative designs that could achieve similar accessibility outcomes with less impact on space?**

☐ Yes ☐ No

What are those approaches? How do they achieve this?

Proposal 8: Disability support animals

A 28 Do you support allowing a broader range of disability assistance animals (beyond guide dogs) on passenger vessels?

☐ Yes ☐ No ☐ It depends

Why / why not?

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

☐ Yes ☐ No ☐ Partially

Why / why not?

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

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

Accessibility and travel decisions

- A 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?

☐ Yes ☐ No

If yes, please describe what happened.

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

☐ Yes ☐ No

If not, why not?

A 34 For disabled passengers, carers, support people and disability organisations: are there particular accessibility features that most influence your decision to travel?

Please describe.

Section 8 Navigation Systems and Equipment Questions

- Proposal 1:** Simplifying and combining vessel categories and requirements
- Proposal 2:** Allowing the second compass to be electronic
- Proposal 3:** Compasses and other navigational systems and equipment would need to meet updated technical performance standards
- Proposal 4:** Additional navigational systems and equipment to align with SOLAS
- Proposal 5:** Compasses on small vessels (Navigation Category 1) would need to be liquid filled
- Proposal 6:** Allowing handheld compasses for small tiller steered vessels
- Proposal 7:** Allowing alternative options to carrying a sextant and a chronometer
- Proposal 8:** More mariners would be able to train as a Compass Adjuster

For information on these specific proposals refer to:

- Page 18 and 19 of the *Invitation to Comment* document
- Part 3K: Navigation Systems and Equipment proposal summary

Proposal 1: Simplifying and combining vessel categories and requirements

N 1.1 Do you support reducing the current vessel categories to four simplified navigation categories?

☐ Yes ☐ No ☐ Partially

Why / why not?

N 1.2 Do the proposed categories appropriately reflect different levels of risk, particularly for vessels operating in the unlimited area?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

N 1.3 Are the proposed category definitions (including size limits, vessel types, and operating areas) clear and appropriate? If not, what should change?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 2: Allowing the second compass to be electronic

N 2.1 Do you support allowing an electronic compass to be used as the second compass where two compasses are required?

☐ Yes ☐ No ☐ Partially

Why / why not?

N 2.2 Are the proposed safeguards for electronic compasses (such as an independent power supply) appropriate and sufficient?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 3: Compasses and other navigational systems and equipment would need to meet updated technical performance standards

N 3.1 What impacts (costs, benefits, or practical challenges) do you expect from requiring compliance with these standards, particularly for older vessels and equipment?

N 3.2 The proposal would require most compasses to be ISO compliant. Do you know if your compass is ISO compliant?

☐ Yes ☐ No ☐ Don't know ☐ No comment

Proposal 4: Additional navigational systems and equipment to align with SOLAS

N 4.1 Are the proposed safeguards for electronic compasses (such as an independent power supply) appropriate and sufficient?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

N 4.2 Are there any other SOLAS navigational requirements you think NZ should adopt to better align with SOLAS and increase safety?

N 4.3 What impacts (costs, benefits, or operational challenges) do you expect from these additional equipment requirements? Or do you already carry this equipment?

Proposal 5: Compasses on small vessels (Navigation Category 1) would need to be liquid filled

N 5.1 Do you agree that a compass on small (Navigation Category 1) vessels operating in restricted limits / inshore fishing limits should be liquid filled?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 6: Allowing handheld compasses for small tiller steered vessels

N 6.1 Do you agree that Category 1 small tiller steered vessels operating close to shore within inshore/restricted limits should be able to carry handheld compasses where no suitable mounting location is available?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

N 6.2 Do you agree that allowing a handheld compass for tiller steered vessels is a practical solution for small vessels without easy mounting options?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 7: Allowing alternative options to carrying a sextant and a chronometer

N 7.1 Do you agree that vessels proceeding into the unlimited should not need to carry a sextant and chronometer where an appropriate electronic navigational aid with backup power supply is available?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Proposal 8: More mariners would be able to train as a Compass Adjuster

N 8.1 Do you support expanding eligibility so a broader range of qualified mariners can train and work as compass adjusters?

☐ Yes ☐ No ☐ Partially

Why / why not?

N 8.2 Do you agree with the proposed qualification and experience requirements (including supervised adjustments) for new compass adjusters?

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

N 8.3 Do you agree this proposal will help address the anticipated shortage of compass adjusters in New Zealand? Please explain.

☐ Strongly agree ☐ Agree ☐ Neutral ☐ Disagree ☐ Strongly disagree ☐ No comment

Why / why not?

Returning this form

Please return this form and any supporting information by 5pm on **Friday 25 September 2026**.

Email this form to: 40-series@maritimenz.govt.nz

Post this form to:

Regulatory Reform Projects Team
Maritime New Zealand
PO Box 25620
Wellington 6146

Courier this form to:

Regulatory Reform Projects Team
Maritime New Zealand
Level 11
1 Grey Street
Wellington 6011

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