



14 August 2025

Joint Submission

New Zealand Shipping Federation & New Zealand Marine Transport Association

The New Zealand Shipping Federation (NZSF), the New Zealand Marine Transport Association (NZMTA), and the New Zealand Federation of Commercial Fishermen (NZFCF) welcome the opportunity to comment on the proposed Craft Risk Management Standard for Biofouling – Clean Vessel Pass (CVP).

The NZSF, NZMTA, and NZFCF all support marine biosecurity and the prevention of invasive marine pests. Our members currently manage biofouling through robust maintenance frameworks, including compliance with the Maritime Operator Safety System (MOSS) and the International Safety Management Code (ISM). However, we oppose the CVP as currently proposed due to its disproportionate impact on the commercial fleet and its failure to address the bulk of recreational vessel risk.

The NZSF, established in 1906, is the key representative body for New Zealand's coastal ship operators. The NZMTA, established in 1970, is a national representative body advocating on behalf of commercial maritime operators across tourism, aquaculture, passenger transport, charter fishing, and workboats. The NZFCF, formed in 1953, represents the interests of New Zealand's commercial fishing fleet, whose operators depend directly on the health of coastal waters and fisheries, and who maintain a strong focus on vessel upkeep and practical measures that reduce biofouling risks.

Together, these organisations work closely with a wide cross-section of the industry – including regulators, surveyors, boatbuilders, designers, seafarers, and operators – to ensure that maritime rules are practical, enforceable, and economically sustainable.

Our Position

Each of our organisations strongly opposes the proposal as it is currently presented. We make a number of recommendations below that, if adopted, could result in industry support.

1. Support for biosecurity in principle

We acknowledge the environmental and economic threats posed by species like exotic *Caulerpa* and *Mediterranean fanworm* and support practical, effective measures.

2. Current measures are sufficient for most operators

- MOSS already mandates hull cleaning, antifouling, and gear maintenance, verified during Maritime NZ audits.

- Common practice includes slipping vessels twice in five years. This is aligned with, or exceeding, IMO and MPI standards.

3. Mischaracterisation of interregional operations

Contrary to suggestions by the agencies that many commercial vessels operate between regions, the majority of the commercial fleet does *not*.

- Inshore fishing vessels typically return to their designated home port after operating within inshore or enclosed limits.
- Passenger vessels likewise operate within harbour or inshore areas, often returning to their base port.
- Only a small minority (likely less than 10%) operate in coastal limits and interregional routes, limited largely to coastal ships and specific offshore service vessels.
- This undercuts a key justification for applying broad-based regulatory requirements.

4. Target the highest-risk vessels – recreational craft

If the proposed Clean Vessel Plan is genuinely a 'highest-risk' approach, it should focus on recreational vessels. The spread of *Caulerpa* matches recreational vessel movement patterns, not those of commercial vessels. Information exists as to the type of vessels that spread invasive species such as *Caulerpa* - yet the proposal chooses to target other sectors instead. With around 1.5 million recreational craft active along New Zealand's coasts, excluding them from biofouling oversight leaves the plan fundamentally unbalanced and ineffective

5. Embed new biofouling rules within existing MOSS plans

The commercial fleet already operates under comprehensive biofouling provisions within their Maritime Transport Operator Plans (MTOCs) and maintenance schedules. Any new biofouling requirements should be integrated into the existing MOSS framework, rather than imposed through a separate compliance regime. This approach maintains effectiveness while avoiding unnecessary duplication, additional audits, and extra costs.

Key concerns with the current proposal

- The proposal places an unnecessary operational burden on commercial operators, due to increased inspections or haul-outs beyond current maintenance schedules.
- Infrastructure constraints, with slipway bookings often 12+ months in advance, making reactive compliance unfeasible. Dry docks for larger vessels need to be booked well in advance and the closest dry dock that has spare capacity is in Singapore, representing unacceptable time out of operational activity.
- Regulatory inequity, with commercial operators targeted while recreational users go unchecked.

NZMTA recommendations

1. Integrate any new biofouling requirements into MOSS maintenance plans and Maritime Transport Operator Plans (MTOP's).
2. Expand the regulatory framework to include recreational vessels, reflecting the broader risk.

3. Maintain slipping/maintenance cycles for 95% of small-to-medium commercial vessels (twice in five years), unless strong scientific evidence indicates a need for change.

Conclusion

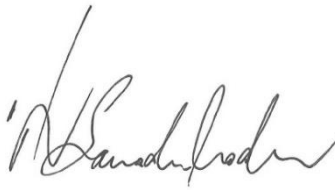
The NZSF, NZMTA, and NZFCF jointly advocate for a risk-based, targeted, and evidence-led approach to marine biosecurity regulation. Applying the Clean Vessel Plan broadly, without clear data to justify its scope, risks imposing unnecessary cost and complexity on most commercial operators while delivering minimal environmental gain.

A more effective strategy is to integrate biofouling requirements into existing practices, ensuring strong compliance and genuine biosecurity outcomes. Critically, the focus should shift to the sector presenting the greatest risk – the recreational fleet. Targeted education for this group on antifouling, equipment cleaning, and hull maintenance is essential to improve practices and reduce the spread of marine pests.

Yours sincerely,



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