

Submission Form

Regulatory Amendments Package 2.0 (RAP 2.0): Proposed Rules Changes to Replace General Exemptions

We would like to hear your feedback on the proposed amendments.

We encourage you to review the consultation material in the documents:

Invitation to Comment – Regulatory Amendments Package 2.0 (RAP 2.0): Proposed Rules Changes to Replace General Exemptions

and

Proposed Regulatory Amendments Package (RAP 2.0) Maritime Rules Amendments 2025 (No 3)

These documents are available on our website at:

maritimenz.govt.nz/public/consultation/regulatory-amendments-package-2025-2-0/

You can have your say by:

- Completing part or all of this submission form; and/or
- Providing written feedback in a format that suits you; and/or
- Requesting to make a verbal submission to Maritime NZ

Please get in touch if you would like us to contact you to discuss the proposals.

The submission deadline is **5pm, on Friday 24 October 2025.**

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Your Details

Name

Email

Organisation
(if applicable)

Position
(if applicable)

**How are you
involved in the
sector?**

Recognised
Surveyor

Owner /
Operator

Vessel Crew /
Master

Boat Builder /
Maintenance

Retailer /Service
Provider

Other

Please share more about your involvement

1. **GE-05-20 – Sea Service and prior certification for Integrated Rating Certificate**

Questions on proposal – Amend sea service and prior certification for IR certificate

Q 1.1 Do you agree with Maritime NZ’s proposal to amend Part 32 so that applicants who meet the requirements for the AB Deck and AB Engine certificates will be eligible for the IR certificate, and will not need additional sea service?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 1.2 Are there specific costs, benefits, or other impacts that you would like to let us know about?

2. GE-06-20: Training Record Book requirement for a MEC 3 certificate

Questions on proposal – Amend when a training record book is required for MEC 3

Q 2.1 Do you agree with Maritime NZ’s proposal to amend the requirements for a MEC 3 certificate so that applicants are not required to document sea service in an approved Training Record Book in the instances where STCW does not require it?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 2.2 Are there specific costs, benefits, or other impacts that you would like to let us know about?

3. GE-08-20: Training requirements – Deck watch rating, Able seafarer deck, Engine room watch rating, Able seafarer engine, and Electro-technical rating

Questions on proposal – Amend training requirements for DWR, AB Deck, EWR, AB Engine, and ETR.

Q 3.1 Do you agree with Maritime NZ’s proposal to amend training requirements for DWR, AB Deck, EWR, AB Engine, and ETR?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 3.2 Are there specific costs, benefits, or other impacts that you would like to let us know about?

4. GE-01-17: Egress or means of escape for passenger accommodation

Questions on proposal – remove requirement for trunked ladders that provide a means of escape.

Q 4.1 Do you agree with Maritime NZ’s proposal to remove the requirement that ladders forming a means of escape from accommodation spaces on vessels less than 24 metres must be trunked?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / Why not?

Q 4.2 Should ladders forming a means of escape in vessels 24 metres or more in length, be required to have trunked ladders?

Why / why not?

Questions on proposal – replace current requirement with a safer ladder angle.

Q 4.3 Do you agree with Maritime NZ’s proposal to allow a greater range of ladder angles?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / Why not?

Q 4.4 Do you agree with the proposal to allow step ladders?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 4.5 Do you agree with the proposed range of ladder angles?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

**Q 4.6 Are you aware of any existing vessels that would or could not comply with these angles?
Please provide details**

Q 4.7 Do you agree with Maritime NZ’s proposal to allow furniture and a vertical hatch instead of a ladder as a second means of escape from spaces permitted to accommodate less than 13 passengers?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / Why not?

Q 4.8 Do you agree with the conditions for allowing the use of furniture and a vertical hatch?

- Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / Why not?

5. **GE-02-17: Means of launching the rescue boat on ships operating up to restricted coastal limits**

Questions on proposal – Allowing alternative means for launching rescue boats (vessels within restricted coastal limits).

Q 5.1 Do you agree with Maritime NZ’s proposal to allow vessels, less than 45 metres in length operating within restricted coastal limits, to have rescue boat launching appliances that are manually operated?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 5.2 Are there specific costs, benefits, or other impacts that you would like to let us know about?

6 GE-06-17: Egress or means of escape for passenger accommodation

Questions on proposal – amend rule to allow multiple means of escape.

Q 6.1 Do you agree with Maritime NZ’s proposed alternative to the required width of a single opening in 40A.19(1)?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 6.2 Do you agree that option 2 is the best way to achieve this? Why / Why not?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 6.3 Are you aware of any existing vessels that would not comply with option 2, if implemented?
Please provide specific examples if so.

7. **GE-07-17: Breathing apparatus set and firefighters' outfit**

Questions on proposal – require two firefighter's outfits and SCBAs for these types of vessels, with some exceptions.

Q 7.1 Do you agree with Maritime NZ's proposal to require two firefighting outfits and SCBAs for these vessels?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 7.2 Do you agree with the proposed discretion surveyors would have to not require some ships to have firefighters' outfits and SCBA?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 7.3 Do you think that there should be more, or less choice available for the number of firefighters' outfits and SCBA that operators need on board their vessels?

Why / why not?

8. GE-13-20: Anchor chain cables and accessories, testing and marking

Questions on the proposal to remake GE-13-20: Anchor chain cables and accessories, testing and marking as changes to the current rules.

Q 8.1 Do you agree with Maritime NZ's proposal to remake GE-13-20 as changes to the current rules?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 8.2 Are there specific costs, benefits, or other impacts that you would like to let us know about?

9. GE-20-20: MF/HF radio in respect of Narrow-band Direct Printing

Questions on proposal to amend rules for MF/HF radio, in respect of requirements for NBDP.

Q 9.1 Do you agree with Maritime NZ's proposal to remake GE-20-20 as a change to the current rules for MF/HF radios?

Strongly agree Agree Neutral Disagree Strongly disagree No comment

Why / why not?

Q 9.2 Are there specific costs, benefits, or other impacts that you would like to let us know about?

Permission to publish your submission

Can Maritime NZ include an anonymous summary of your submission when we publish an overall summary of submissions?

Yes

No

If No, please state why (for example, the information is commercially sensitive)

Do you want to be notified when the summary of submissions for RAP 2.0 is released?

Yes, confirm email address

No

Returning this form

Please return this form and any supporting information by **5pm on Friday 24 October 2025**.

Email this form to: consultations@maritimenz.govt.nz

Post this form to:

Regulatory Reform Projects Team
Maritime New Zealand
PO Box 25620
Wellington 6140

Courier this form to:

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

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