

## Submission Form

### Regulatory Amendments Package 3 (RAP 3): Proposed Maritime and Marine Protection Rules

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 3 (RAP 3) - Proposed Maritime and Marine Protection Rules - 9 April 2026***

and

***Proposed Regulatory Amendments Package 3 (RAP 3): Maritime Rules Amendments 2026 and Marine Protection Rules Various Amendments 2026***

These documents are available on our website at:

<https://www.maritimenz.govt.nz/public/consultation/regulatory-amendments-package-2026-RAP3/>

You can have your say by:

- Completing part or all of this submission form and emailing this back to us; and/or
- Providing written feedback in a format that suits you; and/or
- Requesting to make a verbal submission to Maritime New Zealand (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 15 May 2026**

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## Your Details

<b>Name</b>	
<b>Email</b>	
<b>Organisation (if applicable)</b>	
<b>Position (if applicable)</b>	

<b>How are you involved in the sector?</b>	<input type="checkbox"/>	Recognised Surveyor	<input type="checkbox"/>	Owner / Operator	<input type="checkbox"/>	Vessel Crew / Master	<input type="checkbox"/>	Boat Builder / Maintenance
	<input type="checkbox"/>	Retailer /Service Provider	<input type="checkbox"/>	Not involved in the sector	<input type="checkbox"/>	Maritime School / Training Provider	<input type="checkbox"/>	Other

*Please share more about your involvement in the maritime sector*

**1. Changing the operational limit at which the STCW and STCW- F conventions apply to the unlimited area (>200nm) only**

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**Q1.1 Do you agree with Maritime NZ’s proposal to use STCW and STCW-F flexibility provisions to revise or create new national certificates with privileges within Coastal and Offshore operating limits (~12-200NM)?**

YES       NO

Why / why not?

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

YES       NO

## 2. The recognition of STCW-F sea service

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**Q 2.1** Do you agree with Maritime NZ's proposals for developing pathways from STCW-F to STCW? Are there any specific points you want to add about any of the specific pathways in terms of the gaps identified or the proposals for change (see Appendix 3 of the Invitation to Comment document)?

YES

NO

Why / why not?

**Q 2.2** If these pathways are established, are there any specific things that are required for implementation?

YES

NO

**Q 2.3** Are there specific costs, benefits, or other impacts that you would like to let us know about? This could be for training providers, seafarers, operators, the wider sector or government.

YES     NO

### 3. Skipper Two Nautical Miles Certificate: improving implementation and confirming policy intent

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**Q 3.1** Do you agree with Maritime NZ’s proposal to remove the term “self-declared” from row 5 of “Table 2A Table of requirements for S2NM? Why or why not?

YES       NO

Why / why not?

**Q 3.2** Do you agree with Maritime NZ’s proposal to amend the privileges of the S2NM certificate? Why or why not?

YES       NO

Why / why not?

**Q 3.3** Are there specific costs, benefits, or other impacts that you would like to let us know about?

YES     NO

## 4. Ship Fuel Changeover

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Questions on Option 1 – Fuel changeover outside 12 nm

**Q 4.1 Do you support creating a nationally consistent fuel changeover requirement for New Zealand’s territorial sea?**

YES     NO

**Why / Why not?**

**Q 4.2 Are there any costs, benefits, or other impacts we should consider for this option?**

YES     NO

Questions on Option 2 – Fuel changeover outside 12 nm OR zero-discharge scrubber mode inside the territorial sea

**Q 4.3 Do you support giving ships a choice between changing fuel outside New Zealand’s territorial waters or using scrubbers in zero-discharge mode inside the territorial sea?**

YES     NO

**Why / Why not?**

**Q 4.4 Are there any costs, benefits, or other impacts we should consider for this option?**

YES     NO

Questions on Option 3 – Fuel changeover outside 12 nm OR zero-discharge scrubber mode when moored

**Q 4.5 Do you support allowing ships to use scrubbers in zero-discharge mode only when moored?**

YES     NO

**Why / why not?**

**Q 4.6 Are there any costs, benefits, or other impacts we should consider for this option?**

YES     NO

## **5. Carbon Intensity (CI) Requirements for Domestic Voyaging Ships**

**Q 5.1 Do you consider that revoking Sections C8 to C10 of Rule Part 199 will effectively implement the Government’s decision to use the NZ ETS instead of CI requirements?**

YES       NO

**Why / why not?**

**Q 5.2 Do you think the rules should have a flexibility mechanism for operators to have the option to comply with CI requirements in the future, for business reasons? If so, do you have a preference for the type of certificate to show compliance?**

YES       NO

**Q 5.3 Do you have any feedback on the draft establishing rules being consulted on, for a future marine protection instrument?**

YES     NO

**Q 5.4 Are there specific costs, benefits, or other impacts from this proposal that you would like to let us know about?**

YES     NO

## 6 International Amendments

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**Q 6.1** Do you have any comments about how updates to IMO Conventions are being implemented in the rules?

YES     NO

**Q 6.2** Do you have any comments on specific maritime safety or marine protection outcomes from the proposed updates? If so, what are they?

YES     NO

**Q 6.3** Are you aware of any other impacts (for example other costs or benefits) on the maritime industry from the proposed updates that we have not identified? If so, what are these?

YES       NO

## 7. Miscellaneous Rule Amendments

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**Q 7.1** Are there any practical issues (for example, for survey timing or documentation) that we should consider in implementing this clarification to Part 199?

YES       NO

## Permission to publish your submission

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**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 3 is released?**

Yes, confirm email address

No

## Returning this form

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Please return this form and any supporting information by **5pm on Friday 15 May 2026**.

**Email this form to:** [consultations@maritimenz.govt.nz](mailto: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

## Privacy Act statement

Information in this form is collected and processed for the purpose of supporting the activities of Maritime New Zealand. We will process your personal data in accordance with the Privacy Act 2020. Maritime New Zealand will not disclose personal information unless allowed or required to do so under Principle 11 of the Privacy Act 2020. For more information about how we collect and use your information, please see our [Transparency Statement](#). Please note that if requested, Maritime NZ will release submissions under section 16(1)(e) of the Official Information Act 1982. Please indicate clearly if parts of your submission are commercially sensitive, or if there is another reason you would not want any part of your submission (or your identity) disclosed.

## Accessing personal information

You have the right to request access to personal information about you held by Maritime New Zealand under the Privacy Act. You also have the right to request correction of any personal information held about you by Maritime New Zealand. Maritime New Zealand will take reasonable steps to correct that information and to ensure that the information we hold is correct. If you wish to access or correct personal information Maritime New Zealand holds about you, please contact:

The Privacy Officer  
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