



NEW ZEALAND MERCHANT SERVICE GUILD IUOW Inc

PO Box 11878,

Wellington ph: 64 4 382 9131 Fax: 64 4 382 9106 Email: office@nzmsg.co.nz

IMO Steering Weekly



MNZ Submissions Due this Friday 19 Nov

Submissions on Maritime NZ's proposals for new operating limits and qualifications are due on 19 November. A comprehensive "Guild submission" is now being drafted but members are encouraged to also send in their own individual submissions. There is an online submission form on the Maritime NZ website www.maritimenz.govt.nz which is very easy to fill in.

It is rumoured that the change from "enclosed" to "sheltered" will no longer be pursued by Maritime NZ because of the huge amount of opposition voiced at the public road show meetings all around the country. But as yet this is unconfirmed and we therefore strongly advise members to continue to make submissions and comment on the official Maritime NZ public consultation document, and particularly on the "sheltered waters" proposal in it.

Last week the General Secretary met with the IMO in London to discuss Maritime New Zealand's proposal to define New Zealand waters as "sheltered". The IMO described the proposal as "definitely against the spirit of STCW", and provided some helpful suggestions about how it can be challenged. If the proposal persists, we will not let the matter rest. It is patently obvious to all that Maritime NZ has tried to use the word "sheltered" solely to avoid the application of STCW to vessels operating in the enclosed and 12 mile zone. And with no qualification defined for vessels of over 500 gt operating in this zone, the door is wide open for wholesale reduction of qualifications. And as many commentators have vigorously pointed out, the open ocean waters of New Zealand simply cannot credibly be described in this way.

During the public meetings, a number of statements were made which either contradicted the public consultation document or added new proposals which were not included in the document. For example, that the proposed Cook Strait inshore limit would only apply to vessels under 500 gt. Our advice is to comment on the document as it is written, and to refer to any inconsistent comment you recall from the meeting.

Here are some points you may wish to include in your submission:

- Sheltered waters is a very misleading description;
- The proposed dramatic extension to the offshore limit will allow lower qualifications than foreign going tickets on many offshore vessels, but the new area will include some very notoriously stormy and dangerous seas
- Proposed downgrading of Cook Strait to "inshore" instead of upgrading Foveaux Strait to coastal. Why always the lowest standard?
- Near coastal qualifications are ok as long as second mate foreign going is the base ticket and the syllabus is as current
- Unclear currency requirements for the NZOM/NZOW qualifications

If you need any clarification on any proposals or to check some points, please contact the General Secretary 021404 828.