

Chair

Cabinet Economic Growth and Infrastructure Committee

MARITIME OPERATOR SAFETY SYSTEM: MARITIME RULE PARTS 19 AND 44

Proposal

1. The purpose of this paper is to advise the Committee of my intention to make Maritime Rules Parts 19 and 44, which cover the responsibilities of maritime transport operators and surveyors, and will replace existing safety management and survey rules.

Executive summary

2. Maritime rules are made by the Minister of Transport under the Maritime Transport Act 1994. Rules are not statutory regulations, but Cabinet has agreed that the Minister of Transport would notify Cabinet of the content of any rules on the transport rules programme before signing the Rules into law.
3. The maritime rules that are the subject of this proposal were included in the approved Transport Rules Programme for 2012/13 [EGI Min (12) 27/3 refers].
4. Maritime New Zealand (Maritime NZ) has developed the proposed Maritime Operator Safety System as an effective replacement for the current, under-performing Safe Ship Management System.
5. The Safe Ship Management System has been in place since 1998. It is structured around approved safety systems provided and supervised by commercial entities known as Safe Ship Management companies, which exercise control over the safety management of ships within their systems.
6. Despite efforts to fine-tune the Safe Ship Management System, it has become apparent that fundamental change to the safety management model is necessary. The Safe Ship Management System is confusing and unduly complex, does not provide Maritime NZ with effective means of oversight, and is associated with an unsatisfactory safety record¹.
7. The Maritime Operator Safety System will make Maritime NZ directly responsible for the regulatory control of the domestic maritime industry, and will simplify compliance for vessel operators. Operators will be directly accountable for their own safety systems, rather than being required to belong to a system provided by a Safe Ship Management company. Maritime NZ will oversee the system through assessments, approvals, audits and inspections.
8. Ship surveyors will be required to meet higher standards for recognition as

¹ The average annual number of instances of harm reported to Maritime NZ over the years 2000-2010 is 4.6 fatalities, 41 cases of serious harm, and 109 other injuries.

surveyors, and will be subject to closer quality control by Maritime NZ.

9. The proposed rule Parts 19 and 44 will enter into force on 1 April 2014, but the new safety system will not go live until 1 July 2014. This allows Maritime NZ time to ensure it has the necessary resources in place to deal with the change, provides operators and surveyors with time to adapt, and allows a three month window for pre-certification and pre-approval processes.

Background

10. The maritime industry is high risk by virtue of its operating environment. For example, between 2001 and 2009, commercial fishermen had the highest combined fatality and injury rate of any employment sector in New Zealand, with 7.4 percent of the workforce reporting injuries².
11. Operators of commercial vessels in New Zealand are legally required to provide assurance that their vessels are seaworthy and are being operated safely. Currently, assurance is provided through Maritime Rule Part 21: Safe Ship Management Systems. No commercial ship owner may legally operate a ship that does not have a current Safe Ship Management Certificate.
12. The Safe Ship Management System was introduced in 1998, with the intention that the maritime industry takes responsibility for operational safety. Commercial ships are required to belong to an approved safety management system provided and supervised by an organisation (known as a Safe Ship Management company) that has delegated authority over the safety management of ships operating under its approved system. Ship owners must have and follow a safety manual that describes and implements their Safe Ship Management System.
13. Safe Ship Management companies, which are private service providers, carry out ship inspections and surveys and audits of ships' safety management arrangements. The company issues a Safe Ship Management certificate if the physical condition and safety systems of the ship are satisfactory.
14. It has become evident that the Safe Ship Management System has a number of serious weaknesses:
 - 14.1. it is confusing and unduly complex
 - 14.2. it concentrates on the individual ships within a maritime operation, rather than the overall safety management of the operation
 - 14.3. it does not provide Maritime NZ, as the statutory safety regulator, with an effective and efficient means of oversight of Safe Ship Management companies or commercial vessel operators
 - 14.4. there is an inherent conflict between the role of a Safe Ship Management company as the inspector and auditor of a vessel, and its role as a commercial business seeking to attract and retain operators

² Data sources: ACC accepted claims data, International Labor Organization statistics (LABORSTA) for New Zealand – supplied by Statistics New Zealand, Maritime NZ data.

- 14.5. it is associated with an unsatisfactory safety record
15. An independent review of the Safe Ship Management System undertaken by Thompson Clarke Shipping in 2002 concluded that the system is “too complex for a significant proportion of operators of smaller, less sophisticated vessels”.
 16. The Transport Accident Investigation Commission, in its investigation into the sinking of the fishing vessel *Kotuku*, noted "a regulator that takes too much of a hands-off approach, risks fostering an environment of non-compliance within an industry”.
 17. Concerns about operational safety and the standard of the New Zealand domestic fleet remain an issue. Between 2006 and 2011, deficiencies were identified for approximately 74 percent of all vessels in the Safe Ship Management System. Checks by Maritime NZ safety inspectors over that same period found that Safe Ship Management companies detected vessel deficiencies at 62 percent of the rate detected by Maritime NZ.
 18. Consultation on the proposed Maritime Operator Safety System showed clear concerns from ship operators over the variable quality of ship surveys performed under the current arrangements. This underscored the Maritime NZ analysis noted above, and reflects the absence of any specific surveyor competency or performance expectations under the present system.

Proposed new safety management approach

19. In conjunction with industry, Maritime NZ has developed the Maritime Operator Safety System as a replacement for the Safe Ship Management System. The Maritime Operator Safety System sets out new requirements for the certification and inspection of maritime transport operators, domestic commercial ships, and surveyors.
20. The new approach will no longer require ships to belong to a safety management system provided by a Safe Ship Management company. Instead, maritime transport operators will be directly responsible for having and implementing a maritime operator safety system that addresses all aspects of their operation.
21. This is a fundamental change in emphasis, moving the focus from the ship and ship owner to the person responsible for the conduct of the maritime operation as a whole. Appendix 1 illustrates the differences between the Safe Ship Management System and the Maritime Operator Safety System.
22. Full regulatory supervision is restored to Maritime NZ through direct entry control, enhanced monitoring and oversight, and exit control. Substandard operators will be prevented from entering the Maritime Operator Safety System, and Maritime NZ will have the ability to quickly and decisively address safety concerns that arise after an operator has entered the system.
23. Direct relationships with industry and improved data collection will significantly enhance Maritime NZ’s understanding of safety issues and trends. Over time,

this will enable Maritime NZ to target its regulatory efforts to the areas of greatest concern.

24. Ship surveys will continue to be carried out by private sector surveyors but the maritime rules would no longer limit this role to surveyors employed by a Safe Ship Management company. Surveyors will be subject to closer quality control by Maritime NZ, and will need to have their qualifications and competencies recognised by the Director of Maritime NZ (the Director).
25. The increased emphasis on survey quality reflects consultation with industry, which revealed a desire for Maritime NZ to be more involved in the oversight of surveyors' performance and surveyors' professional and ethical conduct.
26. The measures necessary to give effect to these new arrangements are contained in the following proposed new maritime rules.

Maritime Rule Part 19: Maritime Transport Operator – Certification and responsibilities (Part 19)

27. Part 19 will require commercial operators to have a Maritime Transport Operator Certificate issued by the Director for their maritime operation, and a Certificate of Survey issued by a recognised surveyor for each vessel within the operation.
28. A Maritime Transport Operator Certificate may be issued for up to 10 years, compared with a maximum duration of five years for a Safe Ship Management Certificate under existing rules. This reflects that operator performance, rather than the certification period, is the key to improved safety outcomes, which Maritime NZ will pursue through the active ongoing oversight of operators and surveyors under Parts 19 and 44.
29. All information required to gain a Maritime Transport Operator Certificate will be held in the operator's Maritime Transport Operator Plan. This information includes:
 - documentation of the operator's safety system and safe operating procedures
 - Certificates of Survey and survey plans for each ship in the maritime operation
 - maintenance plans, safety equipment lists and spares lists for each ship in the maritime operation
30. The Director will issue a Maritime Transport Operator Certificate if satisfied that the operator meets the fit and proper person criteria of the Maritime Transport Act and the operator and their Maritime Transport Operator Plan meet the requirements of Part 19. Operators must ensure that Maritime Transport Operator Plans meet the rule requirements at all times. Maritime NZ will audit operators regularly to ensure that the plans remain viable and are actively implemented.

31. In order to maintain a Maritime Transport Operator Certificate, the operator must ensure that all vessels undergo a physical inspection (a survey) by a recognised surveyor at regular intervals.
32. A Certificate of Survey will remain valid if the vessel is sold or transferred, unlike a Safe Ship Management certificate, but the vessel must be included in the new owner's or transferee's Maritime Transport Operator Plan. A change in the use of a ship, for example from fishing to passenger transport, may require a change to the operator's Maritime Transport Operator Certificate and the conditions of the ship's Certificate of Survey.
33. Transitional arrangements will deem an existing Safe Ship Management Certificate for a ship to be a Maritime Transport Operator Certificate that expires on the expiry date of the existing certificate. For operations with multiple ships, the deemed certificate will expire on the earliest expiry date of the relevant existing certificates.
34. Although the current requirement for ships to belong to a safety management system provided by a Safe Ship Management company will cease, this will not prevent these businesses from providing services to support commercial maritime operators in meeting their revised safety management responsibilities.
35. Incentives for compliance are closely aligned with safety outcomes under Part 19. As Maritime NZ's understanding of industry safety performance improves, low risk operators can expect less frequent audits than operators that present safety concerns.
36. Under the proposed rule, Maritime NZ's role would shift from overseeing the performance of Safe Ship Management companies to overseeing the performance of maritime transport operators and surveyors. This more direct oversight role will increase Maritime NZ's ability to achieve an improved safety record.

Maritime Rule Part 44: Surveyor responsibilities and survey, certification and maintenance for ships in maritime transport operations (Part 44)

37. Current maritime rules provide that no person may issue a Certificate of Survey for a commercial vessel unless they have a valid Certificate of Surveyor Recognition issued by the Director. However, the rules contain no framework for specifying competency and technical requirements for the conduct of surveys, or for oversight of surveyors' performance.
38. Part 44 requires that in order to gain a Certificate of Surveyor Recognition, it will be necessary to satisfy competency and practice requirements that are now explicitly provided for in the rule, and to meet 'fit and proper person' criteria under the Maritime Transport Act. These requirements will ensure consistency and best practise across the industry.
39. Part 44 sets out high level criteria and conditions for surveyor recognition and provides for the Director to impose requirements as to the performance of surveys by recognised surveyors.

40. The Director must notify and consult surveyors and other interested parties before imposing any requirements as to the performance of surveys.
41. These arrangements ensure that a formal surveyor competency and performance framework exists, within which underlying technical matters can be managed adaptively, which is important in a profession that must keep up with technological and other changes.
42. Current surveyors will continue to be recognised until the expiry date of their current certificate if they continue to meet all relevant conditions of certification. Thereafter, recognised surveyors will need to apply for recertification under Part 44.
43. Although surveyor recognition will no longer be limited to people employed by a Safe Ship Management company, surveyors employed by those businesses will continue to be able to carry out survey work, subject to the new rules.
44. In addition to providing the surveyor recognition framework, Part 44 specifies the ship safety, documentary and procedural requirements that must be met before a survey certificate may be issued in respect of a ship. These requirements include design, construction, equipment, and survey and maintenance planning.
45. Before issuing a survey certificate under Part 44, a surveyor must also be satisfied that the survey plan, maintenance plan and safety equipment and spares list required under Part 19 have been developed for that ship.
46. Ships that have a Fit for Purpose Certificate and current New Zealand Safe Ship Management Certificate will be deemed to have been issued with a Certificate of Survey under Part 44 until the earlier of the expiry date of the Fit for Purpose Certificate or the next inspection date specified in a ship's maintenance plan.

Implementation and monitoring

47. Maritime NZ has undertaken organisational redesign to allow it to better implement the new framework. A dedicated project team is planning implementation, and increased training in maritime safety is being undertaken.
48. Both Maritime Rules Parts 19 and 44 will come into force on 1 April 2014 but the privileges of a Maritime Transport Operator Certificate under Part 19 or recognition as a surveyor under Part 44 will not become operative until 1 July 2014. This will ensure that Maritime NZ has the necessary resources in place to deal with the change, operators and surveyors have time to adapt, and will allow a three month window for pre-certification and pre-approval processes before 1 July 2014.
49. Between 1 July 2013 and 1 April 2014 Maritime NZ intends to further engage with industry to get ready to implement the Maritime Operator Safety System. This includes:

- 49.1. developing the operational policies, procedures, and, where needed, IT systems to implement the new rules
 - 49.2. determining the level of fees and charges to support Maritime Operator Safety System activities
 - 49.3. developing sector-specific information and advisory material for the maritime community by working in partnership with representatives from the various sectors involved
 - 49.4. working with surveyors to determine the standards and competencies that will need to be met under the Maritime Operator Safety System
 - 49.5. training Maritime NZ staff to help participants in the Maritime Operator Safety System – owners, operators, skippers and surveyors – understand and fulfil their responsibilities
50. Maritime NZ has established a group of industry experts to advise on key operational matters relating to the implementation of the new Maritime Operator Safety System.
51. An evaluation and monitoring framework for the Maritime Operator Safety System will combine input from the industry and other key stakeholders with data collected directly by Maritime NZ through its enhanced regulatory role. Maritime NZ intends to use improved information flows to refine its regulatory approach in order to respond to emerging safety issues. Over time, information will be used to make efficiency gains. Success measures will be developed and applied to assess whether the Maritime Operator Safety System programme has achieved the intended objectives and identify any unintended outcomes and options for addressing such outcomes.

Costs

52. The approximately 2000 existing operators will move progressively into the new Maritime Operator Safety System over the next four years upon expiry of their existing certification. New operators (an estimated 150 a year) will enter the system directly. Entry into the new system will involve a one-off application cost that replaces some current Safe Ship Management System charges.
53. In the longer term, other features of the Maritime Operator Safety System are expected to lower the incidence of costs. For example, the Maritime Transport Operator Certificate covers all vessels in an operation for ten years, whereas the Safe Ship Management System requires a new certificate for every vessel every four or five years (depending on vessel type). A single audit per operation under the new system is more cost effective than the current requirement for each vessel to be audited. A slightly extended survey cycle under the new system will spread survey costs over longer intervals.
54. For an individual operator, costs will also depend on the size and complexity of the operation, compliance and safe operating performance, and the market rate for survey services. The time required for an audit, and the cost, will reflect size and complexity and the operator's level of compliance with regulatory requirements. Audit frequency will vary according to the individual operation's

operating record, with the better performers benefitting from less frequent audits, while bad operators can expect to face more audit costs.

55. Table 1 shows cost comparisons between the current and new systems for a typical single vessel operation and for a specific high quality medium/large multi-vessel business operating 10 vessels. The table shows aggregate and average annual costs covering all transactions under each system over 10 years, i.e. the duration of a Maritime Transport Operator Certificate under the new system. Appendix 2 shows the distribution of costs under both systems over the 10 year period.
56. Overall costs are slightly higher for a single vessel operator and appreciably lower for a multi-vessel operator. This reflects that entry costs for a small operator represent a higher proportion of 10 year costs than for multi-vessel operators, and that the benefits of operator rather than ship certification and audit, and of longer survey intervals, increases with the number of vessels.
57. A further cost factor under the current system is the need for Maritime NZ to carry out follow-up inspections to verify survey adequacy, due to the quality control problem discussed in paragraphs 16 to 18. Maritime NZ's direct control over surveyor performance under the Maritime Operator Safety System will remove the need for follow-up inspections to manage quality control.
58. Table 1: Ten year cost comparison: (GST excl)

	Current system	New system	Current system	New system
	Single vessel operator		Multi-vessel operator	
Initial entry	\$2,950	\$2,975	\$22,423	\$18,627
Ongoing costs				
Safe Ship Management	\$7,430*	na	\$24,610	na
Survey		\$3,600	\$106,385	\$81,805
Maritime NZ	\$2,390	\$5,428	\$35,558	\$19,187
Ten year total	\$12,763	\$14,026	\$188,976	\$119,619
Annual average	\$1,276	\$1,403	\$18,898	\$11,962

* Audit and survey are combined for single vessel operators

59. The Safe Ship Management System costs are based on the charges of the two largest companies, which have a 73 percent market share. Charges for surveys are expected to remain at similar levels in future, as surveys will continue to be performed commercially, but independently of Safe Ship Management companies.

60. Maritime NZ costs for both systems have been estimated based on the increased hourly rate already built into fees for a range of Maritime NZ activities following the Maritime NZ funding review in 2011³ [EGI Min (13) 6/1, CAB Min (13) 10/6 refer]. Under those arrangements, the hourly rate rises progressively to \$205 (GST excl) over six years from 1 July 2013. The estimate is based on the rate of \$145 (GST excl) for years one to three of the transition, increasing to the full hourly rate in year seven. The estimate takes into account all features of a new regulatory framework, including IT requirements and the implementation processes and procedures that Maritime NZ is developing with the industry expert group noted in paragraph 50.
61. Maritime NZ fees for Maritime Operator Safety System-related services are still to be formally determined but Maritime NZ has developed a fee proposal which reflects the cost factors described in paragraph 60.
62. Maritime NZ will consult affected parties on the fees once the Maritime Operator Safety System rules have been made, and a fee proposal will be developed for Cabinet consideration in late 2013, with the fees to come into force alongside the new rules on 1 April 2014.

Consultation

63. There have been two rounds of formal consultation, in 2010 and 2012. In each case, draft rules and invitations to comment were published on Maritime NZ's website. 18 public meetings were held around the country.
64. The 2010 consultation round drew a large response, a majority of which was positive. The largest amount of feedback concerned changes to the survey function. In response, Maritime NZ undertook further work, and prescriptive detail about surveyor competency and currency was replaced with more flexible requirements.
65. The second round of consultation, in 2012, attracted 78 submissions, with two-thirds supporting the changes or supporting with amendments. Concerns were raised about the cost to operators, the ability of Maritime NZ to implement the system, and a need for more implementation detail.
66. As a result of the submissions, the implementation date of the Maritime Operator Safety System has been set at 1 July 2014. This will ensure that Maritime NZ has time to engage further with industry and develop the guideline material and tools for implementation, and industry has time to prepare for the transition to the new system.
67. Concerns over compliance costs will be taken into account in implementation decisions and design. Good operators will be provided with the opportunity to reduce costs, for example through linking audit frequency to operator performance.

³ Shipping (Charges) Amendment Regulations 2013 and the Ship Registration (Fees) Regulations 2013

Consultation with Government

68. The following departments were consulted in the drafting of this paper: Treasury, Department of Conservation, Ministry of Business, Innovation, and Employment, Ministry of Primary Industries, and the State Services Commission. The Department of the Prime Minister and Cabinet was informed.

Financial implications

69. There are no financial implications for the Crown from these new rules.

Human rights, gender, and disability implications

70. There are no human rights, gender, or disability implications.

Legislative implications

71. Maritime Rule Part 19 Maritime Transport Operator: Certification and responsibilities and Maritime Rule Part 44: Surveyor responsibilities and survey, certification and maintenance for ships in maritime transport operations will be created.
72. These new rules require the repeal of Section 2 of Maritime Rule Part 21: Safe Ship Management Systems, and Sections 2, 3 and 5 of Maritime Rule Part 46: Surveys, Certification and Maintenance.
73. Cross references in other maritime rules to the Safe Ship Management system in Section 2 of Maritime Rule Part 21 and Sections 2 and 5 of Maritime Rule Part 46, will need to be revoked and, where appropriate, replaced with cross references to the equivalent provisions in Parts 19 and 44. Maritime NZ is preparing the relevant rule amendments at a later date, which I intend to make at a later date, to take effect at the same time as Parts 19 and 44.
74. Amendments to the Maritime (Offences) Regulations 1998 and the Shipping (Charges) Regulations 2000 will respectively be necessary to reflect the rule changes and set fees for Maritime New Zealand services in relation to the new rules.

Regulatory Impact Analysis

75. A Regulatory Impact Statement is required with respect to the proposals in this paper. A Regulatory Impact Statement has been prepared by Maritime NZ and is attached to this Cabinet Paper as appendix 1. The Regulatory Impact Statement and associated material were assessed by the Ministry of Transport Regulatory Impact Statement panel as meeting the quality assurance criteria.
76. I have considered the analysis and advice of my officials, as summarised in the attached Regulatory Impact Statement and I am satisfied that the regulatory proposals recommended in this paper: are required in the public interest; will deliver the highest net benefits of the practical options available; and are consistent with our commitments in the Government statement "Better Regulation, Less Regulation."

Publicity

77. Maritime NZ is developing supporting information on how the rules will work. It will then progressively publish additional information on what the industry needs to know and do under the Maritime Operator Safety System in preparation for 1 July 2014. Maritime NZ is also undertaking an extensive multimedia programme of guidance and seminars for operators, planning for which is currently under way.
78. This Cabinet paper and attached Regulatory Impact Statement will be made publicly available following the signing of these rules.

Recommendations

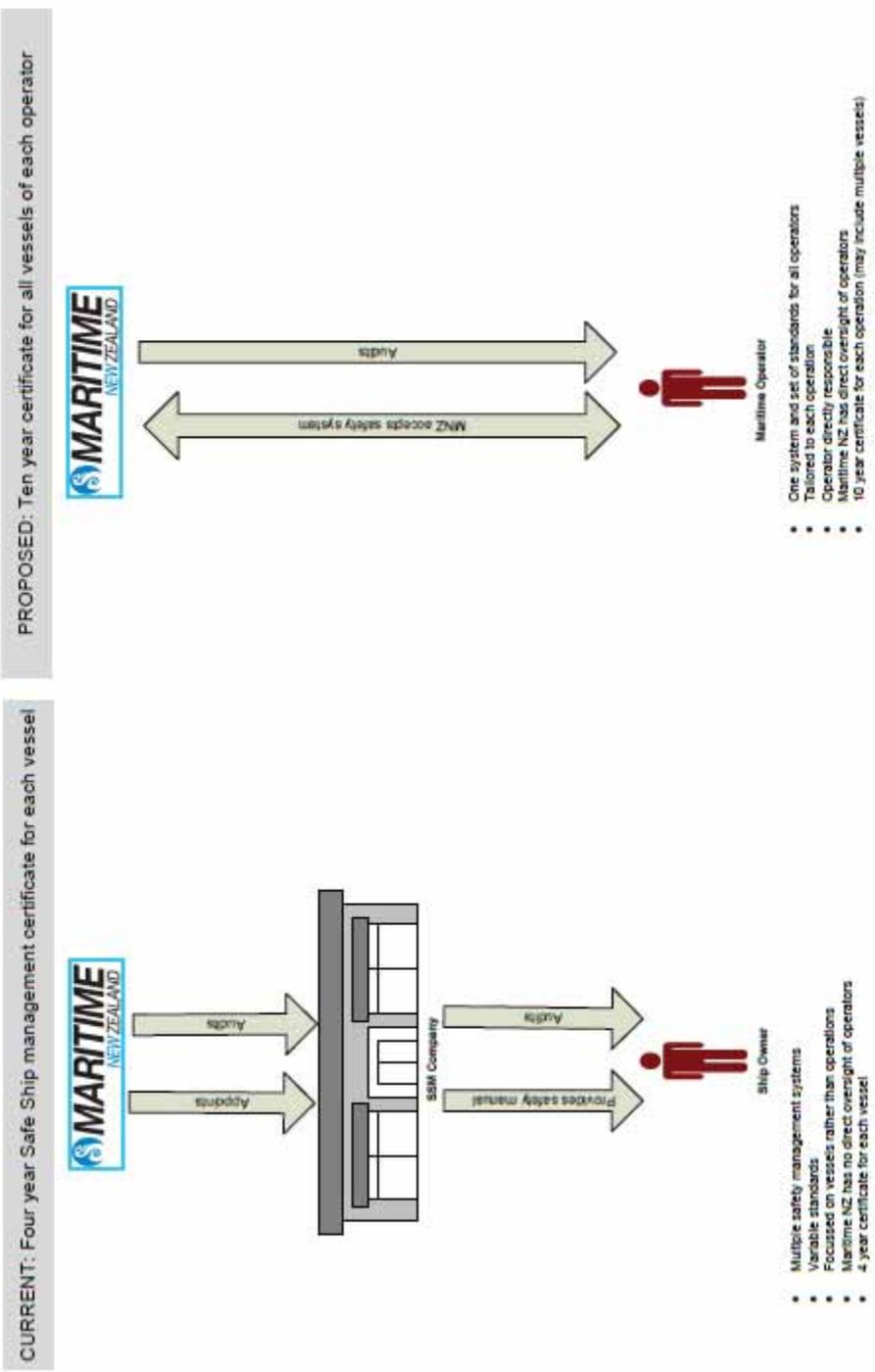
79. The Minister of Transport recommends that the Committee:
 1. **note** that Maritime New Zealand has developed the proposed Maritime Operator Safety System to replace the current Safe Ship Management system, which is confusing and unduly complex, does not provide Maritime NZ with effective means of oversight, and is associated with an unsatisfactory safety record
 2. **note** that the Maritime Operator Safety System will:
 - i. replace the Safe Ship Management System
 - ii. make maritime operators responsible for providing their own maritime transport operator plans, specific to their particular ships and operations
 - iii. make Maritime NZ directly responsible for the regulatory control of the domestic maritime industry, and will simplify compliance for vessel operators
 - iv. make ship surveyors subject to higher standards for recognition as surveyors, and closer quality control by Maritime NZ
 3. **note** my intention to make Maritime Rule Part 19 – Maritime Transport Operator Certification and Responsibilities, which implements the new maritime transport operator plan, certification and oversight framework and repeals Section 2 of Maritime Rule Part 21 – Safe Ship Management Systems
 4. **note** my intention to make Maritime Rule Part 44 – Surveyor Responsibilities, Surveys, Vessel Certification, and Maintenance, which provides a framework for competency and technical requirements for the conduct of surveys, and for oversight of surveyors' performance and repeals Sections 2, 3 and 5 of Maritime Rule Part 46 – Surveys, Certification and Maintenance
 5. **note** that these maritime rules will come into force on 1 April 2014

6. **note** my intention to make consequential amendments to other maritime rules that refer to Section 2 of Maritime Rule Part 21 and Sections 2 and 5 of Maritime Rule Part 46, at a later date to take effect at the same time as these rules
7. **note** that these amendments to the maritime rules were included in the approved Transport Rules Programme for 2012/13 [EGI Min (12) 27/3 refers] and have been developed in accordance with the statutory criteria and consultation requirements prescribed for rule-making by the Minister of Transport under the Maritime Transport Act 1994
8. **agree** to publish this Cabinet paper on the Ministry of Transport's website

Hon Gerry Brownlee
Minister of Transport

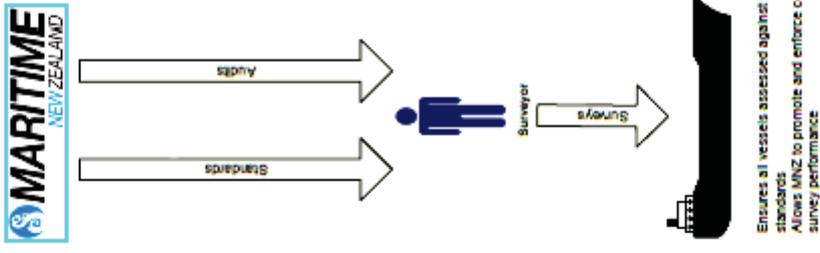
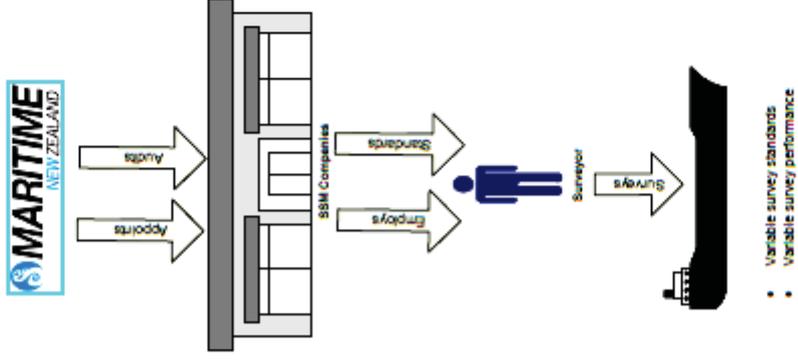
Dated: _____

SAFE MANAGEMENT OF SHIPS



SHIP SURVEY (SAFETY VERIFICATION)

CURRENT: Surveys provided by SSM Co. surveyors to in-house standards PROPOSED: Surveyors operate independently, to MNZ standards



10 YEAR COMPARISON OF COSTS (\$ GST Excl) FOR CURRENT SAFE SHIP MANAGEMENT SYSTEM AND NEW MARITIME OPERATOR SAFETY SYSTEM

SINGLE VESSEL OPERATOR (medium complexity)

Safe Ship Management System (SSM)			Maritime Operator Safety System (MOSS)		
<u>Year 1</u>	Total	2,945	Total	2,977	
SSM Cert (SSM Co)		100	<i>MTOC application</i>	1,777	
<i>SSM Cert (MNZ)</i>		363			
<i>MNZ inspection</i>		482	Renewal Survey	1,200	
Renewal Survey (incl SSM audit)		1,475			
SSM manual		375			
SSM membership fee		150			
<u>Year 2</u>	Total	180	Total	2,021	
SSM membership fee		180	<i>Initial audit</i>	2,021	
<u>Year 3</u>	Total	1,525	Total	1,200	
Mid term survey (incl SSM audit)		1,375	Mid term survey	1,200	
SSM membership fee		150			
<u>Year 4</u>	Total	180	Total	-	
SSM membership fee		180			
<u>Year 5</u>	Total		Total	2,615	
SSM Cert (SSM Co)		100	<i>Ongoing audit</i>	2,615	
<i>SSM Cert (MNZ)</i>		513			
<i>MNZ inspection</i>		682			
Renewal survey (incl SSM audit)		1,475			
SSM membership fee		150			
<u>Year 6</u>	Total	180	Total	1,200	
SSM membership fee		180	Renewal survey	1,200	
<u>Year 7</u>	Total	1,555	Total	-	
Mid term survey (incl SSM audit)		1,375			
SSM membership fee		180			
<u>Year 8</u>	Total	180	Total	4,013	
SSM membership fee		180	<i>Ongoing audit</i>	2,813	
			Mid term survey	1,200	
<u>Year 9</u>	Total	2,919	Total	-	
SSM Cert (SSM Co)		100			
<i>SSM Cert (MNZ)</i>		513			
<i>MNZ inspection</i>		682			
Renewal survey (incl SSM audit)		1,475			
SSM membership fee		150			
<u>Year 10</u>	Total	180	Total	-	
SSM membership fee		180			
TOTAL		12,763	TOTAL	14,026	
ANNUAL AVERAGE		1,276	ANNUAL AVERAGE	1,403	

MULTI-VESSEL OPERATOR (10 vessels, high complexity)

SSM			MOSS		
<u>Year 1</u>	Total	22,423		Total	18,627
SSM Cert (SSM Co)		400	<i>MTOC application</i>		3,362
SSM Cert (MNZ)		1,450			
MNZ inspection		2,818			
Renewal survey		10,925	Renewal survey		10,925
SSM audit		2,490	Mid term survey		4,340
Mid term survey		4,340			
<u>Year 2</u>	Total	14,691		Total	14,207
SSM Cert (SSM C)		200	<i>Initial audit</i>		4,892
<i>SSM Cert (MNZ)</i>		400			
<i>MNZ inspection</i>		1,886			
Renewal survey		4,615	Renewal survey		10,925
SSM audit		2,490	Mid term survey		4,700
Mid term survey		4,700			
<u>Year 3</u>	Total	20,292		Total	13,043
SSM Cert (SSM Co)		200	<i>MTOC amendment</i>		395
<i>SSM Cert (MNZ)</i>		875			
<i>MNZ inspection</i>		2,162			
Renewal survey		4,715	Renewal survey		4,615
SSM audit		2,490			
Mid term survey		9,850	Mid term survey		9,850
<u>Year 4</u>	Total			Total	6,230
SSM Cert (SSM Co)		200			
<i>SSM Cert (MNZ)</i>		950			
<i>MNZ inspection</i>		2,575			
Renewal survey		5,050	Renewal survey		1,890
SSM audit		2,490	Mid term survey		4,340
Mid term survey		4,340			
<u>Year 5</u>	Total	24,189		Total	11,739
SSM Cert (SSM Co)		400	<i>Ongoing audit</i>		6,329
<i>SSM Cert (MNZ)</i>		2,050			
<i>MNZ inspection</i>		3,984			
Renewal survey		10,925	Renewal survey		10,925
SSM audit		2,490			
Mid term survey		4,340	Mid term survey		4,340
<u>Year 6</u>	Total	14,446		Total	15,660
<i>SSM Cert (SSM Co)</i>		200	<i>MTOC amendment</i>		395
<i>SSM Cert (MNZ)</i>		1,025			
MNZ inspection		2,416			
Renewal survey		4,615	Renewal survey		10,925
SSM audit		2,490			
Mid term survey		4,700	Mid term survey		4,340
<u>Year 7</u>	Total	20,813		Total	9,315
SSM Cert (SSM Co)		200			
<i>SSM Cert (MNZ)</i>		1,025			
<i>MNZ inspection</i>		2,533			
Renewal survey		4,715	Renewal survey		4,615
SSM audit		2,490			
Mid term survey		9,850	Mid term survey		4,700

<u>Year 8</u>	Total	15,883	Total	19,483
SSM Cert (SSM Co)		200		
<i>SSM Cert (MNZ)</i>		<i>1,025</i>	<i>Ongoing audit</i>	<i>6,808</i>
<i>MNZ inspection</i>		<i>2,778</i>		
Renewal survey		5,050	Renewal survey	2,825
SSM audit		2,490		
Mid term survey		4,340	Mid term survey	9,850
<u>Year 9</u>	Total	24,189	Total	6,625
SSM Cert (SSM Co)		400		
<i>SSM Cert (MNZ)</i>		<i>2,050</i>		
<i>MNZ inspection</i>		<i>3,984</i>	<i>MTOP amendment</i>	<i>395</i>
Renewal survey		10,925	Renewal survey	1,890
SSM audit		2,490		
Mid term survey		4,340	Mid term survey	4,340
<u>Year 10</u>	Total	15,446	Total	5,050
SSM Cert (SSM Co)		200		
<i>SSM Cert (MNZ)</i>		<i>1,025</i>		
<i>MNZ inspection</i>		<i>2,416</i>		
Renewal survey		4,615	Renewal survey	5,050
SSM audit		2,490		
Mid term survey		4,700	Mid term survey	-
TOTAL		188,976	TOTAL	119,619
ANNUAL AVERAGE		18,898	ANNUAL AVERAGE	11,962

Legend

Maritime NZ charges are shown in italics

MTOC – Maritime Transport Operator Certificate

MTOP – Maritime Transport Operator Plan