



New Zealand Recreational Canoeing Association Inc.

22 September 2003

John Marshall
Maritime Safety Authority
PO Box 27 006
Wellington

Dear John.

I have received a lot of correspondence from Association members who have attended the kayaking and canoeing industry seminars you have conducted around the country. These members have raised several issues with the Association.

MSA has admitted that previous consultation on the issues raised at these seminars has been poorly conducted because of a lack of understanding of whom paddlers are and how to contact them. MSA has been very aware of the existence of NZRCA and its role in the New Zealand paddling community for some time. The Association feels that MSA has performed extremely poorly here in not consulting the Association on these matters. We would like to see NZRCA consulted in the future on ANY issue that relates to kayaking or canoeing.

MSA has acknowledged that the incident and accident reporting forms available for kayakers to use are entirely inappropriate. There was an indication at the seminars that a new form is due for release. A project that the Association is currently working on is the creation of an incident and accident database. A reporting form that captures useful information for this database is essential. I would like to have the opportunity to review the MSA form before it is released to ensure that all relevant data is able to be captured.

MSA has also acknowledged that Maritime Rule 91 is unworkable in terms of kayaking and canoeing. In particular we have concerns regarding Rule 91.4 and 91.17. The personal flotation devices currently available in New Zealand which comply with Rule 91.4 are entirely inappropriate for kayaking or canoeing, and may further endanger a kayaker. Personal flotation devices that are specifically designed for kayaking and canoeing do not currently comply with NZ Standard 5823, but most comply with an appropriate international standard. At the earliest possible opportunity we would like to see the Director approve personal flotation devices certified under recognised international standards, as allowed for in the definition of personal flotation device in Rule 91, for use by kayakers. NZRCA is willing to assist MSA to decide which international standards are appropriate. Rule 91.17 can only be described as ridiculous when it is applied to kayaks and canoes on rivers. I have been informed that MSA has advised at the meetings in Hanmer Springs and Nelson that they are willing to provide a moratorium for the application of Rule 91 to kayakers and canoeists. Can you please confirm in writing the existence of this moratorium as soon as possible. Our members are very concerned about these matters and the kayaking season is upon us now.

NZRCA represents canoe clubs all over New Zealand. MSA has also indicated that they consider canoe clubs to be commercial operators. As such NZRCA represents the interests of these commercial operators. We would like to see a tighter time frame for the release of any Codes or Rules that may arise from the discussion papers due for release. Canoe clubs around New Zealand are currently extremely concerned about these issues and would like to see a quicker resolution.

I will contact you soon to discuss these issues.

Regards,

Glenn Murdoch
Safety Officer
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Cc:

Paul Swain, Minister of Transport;
Judith Tizard, Associate Minister of Transport;
Harry Duynhoven, Associate Minister of Transport;
Helen Clark, Prime Minister;
Jill Dalton, President, NZOIA.