

# Draft Navigation Safety Bylaw 2026 feedback

\* Compulsory question

## Your contact details

Only your name will be publicly visible as part of your submission.

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<b>Do you wish to speak to your submission at a public hearing?</b>	<input type="button" value="Yes"/>

Please make sure you have provided your contact details (email and/or phone number) so we can be in touch to arrange a time. Hearings can be in person or online. Hearings will be livestreamed.

Hearings will be sometime in late February to March 2026 (date will be confirmed closer to the time).

## Your feedback

**Please give us your feedback on the changes to the Navigation Safety Bylaw 2020, as outlined in the Draft Navigation Safety Bylaw 2026. What would you change? What do you support or not support?**

### 1. Introduction

Thank you for the opportunity to comment on the Draft Navigation Safety Bylaw 2026. I'm a user of Otago's waterways and have a strong interest in safe, practical, and well managed navigation rules. I support the intent of improving safety, but several of the proposed changes introduce new obligations that appear to carry significant operational and enforcement costs.

As an individual harbour user, I'm keen to ensure the bylaw is both effective and realistically enforceable, and that the costs associated with these changes are clearly understood before the bylaw is finalized.

### 2. General Comments

The draft bylaw expands the scope of navigation controls in several areas — AIS requirements, mooring inspections, Reserved Areas, Special Speed Zones, and incident reporting. These changes may improve safety, but they also imply a substantial increase in monitoring, administration, and enforcement activity by ORC.

Before these changes are adopted, I believe it's important that the Council provides clarity on:

- How these new responsibilities will be resourced
- What the expected operational costs are
- Whether ORC currently has the capability to enforce the new rules
- How compliance will be monitored in practice

Without this information, it's difficult for the public to assess whether the proposed changes are proportionate and achievable.

### 3. Specific Areas of Concern

#### 3.1 AIS Requirements

The expansion of AIS obligations to include smaller commercial vessels, charter vessels, and vessels operating at night or in restricted visibility is a significant change.

This raises several questions:

- Does ORC have the infrastructure to monitor AIS signals?
- Has the cost of this technology been assessed?
- How will compliance be enforced?
- What is the expected cost impact on smaller operators?

AIS is a valuable safety tool, but the practical and financial implications need to be clearly outlined.

#### 3.2 Harbour Master Powers and Workload

The draft gives the Harbour Master broader authority, including:

- Restricting or revoking SSZ approvals
- Declaring Specified MPZs
- Requiring mooring inspections and repairs
- Approving or declining special events
- Temporarily reserving or suspending areas

These are substantial responsibilities. They will require more staff time, more patrols, and more administrative support.

I would like to understand:

- Whether ORC has assessed the additional workload
- Whether more staff or equipment will be required
- How these costs will be funded

#### 3.3 Mooring Inspection Requirements

The requirement for moorings to be inspected by a "Competent Person" and repaired to Harbour Master specified standards is a major shift.

This will require:

- Oversight of inspectors
- Clear standards and documentation
- Enforcement processes
- Communication with mooring owners

I would appreciate clarity on whether ORC intends to recover costs from mooring owners and what the expected financial impact will be.

#### 3.4 Expansion of Reserved Areas and Special Speed Zones

The draft introduces or expands several zones, including:

- Special Speed Zones
- Reserved Areas
- The Halfway Islands Safety Zone

These zones will require:

- New signage and markers
- Public education
- Ongoing patrols
- Monitoring and enforcement

I would like to see the cost estimates for implementing and maintaining these zones.

### 3.5 Mandatory Incident Reporting

The requirement to report all accidents, incidents, and hazards within 24 hours – including submitting Maritime NZ forms to the Harbour Master – will increase reporting volume significantly.

This will require:

- A system to receive and track reports
- Staff to triage and follow up
- Enforcement capability

Has ORC assessed the expected increase in workload and the staffing required to manage it?

### 4. Requests for Clarification

To help the public understand the impact of the proposed bylaw, I respectfully request:

1. A clear summary of changes from the current bylaw
2. A costed implementation plan
3. Details of expected staffing and enforcement capability
4. A compliance and monitoring strategy
5. Information on cost recovery for mooring owners and commercial operators
6. An assessment of whether the proposed changes are proportionate to the risks they aim to address

### 5. Conclusion

I support the goal of improving navigation safety, but the draft bylaw introduces several new obligations that appear to carry significant operational and financial implications. Before the bylaw is finalized, I believe it is important that ORC provides clarity on how these changes will be resourced and enforced, and whether the proposed measures are practical and proportionate.

Thank you for considering my submission.

Rob Bishop

Dunedin

## Upload any supporting documents (optional)

Upload any documents you have to support your feedback, or upload your feedback itself. For visual and audio feedback, please include the links in a document.

Accepted file formats: PDF, Word, Excel, JPG, PNG.

Max size of each file: 5 MB

Maximum number of files you can upload: 3

## About you (optional)

What area do you live in?



**Which age group are you in?**

**Which of the following describe/s you? Select all that apply.**

