

7 June 2016      By email

**Re: Proposed amendments to Maritime Rules Part 32: Seafarer Certification**

Thank you for the opportunity to comment on the proposed changes to the SeaCert Rules. As part of our information gathering, TIA attended one of the regional forums convened by MNZ, engaged with representatives of the Maritime Forum, and asked TIA maritime members for feedback.

Our overall view is that the proposals are welcomed by industry. We had a low response rate on our request for feedback from our members which indicates that the proposed changes are an important matter of concern to them. The proposals recognise the difficulties certificate holders face in transitioning to the new models of certification and appear to have reached a reasonable middle ground through either doing away with the requirement for transition, or making the transition process more user-friendly.

One area of concern our members have raised is around the validity period for maritime licences. The view is there should be a requirement to stay current with core mariner skills as well as changes in technology and best practice for their certification e.g. life jackets, first aid and firefighting. Additionally, the responsibility for this requirement should be shared between the employer and MNZ. The view is that MNZ has a responsibility to ensure that any licence holder remains current in the syllabus required of the underpinning qualification. We ask that consideration is given to the role MNZ plays in how mariners maintain currency of their skills and knowledge.

Overall, the proposed changes are a positive development for the industry and we commend MNZ on their acknowledgment of the aforementioned difficulties and their willingness to review the situation and move to a more favourable outcome for certificate holders.

Thank you for your consideration and time. Please do not hesitate to contact me for more information or clarification.

Kind regards,



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