

Regulatory Impact Statement

Maritime NZ Mid-Point Funding Review 2015

Agency Disclosure Statement

The Ministry of Transport has prepared this Regulatory Impact Statement, which provides analysis of options to revise fees and the maritime levy administered by Maritime NZ.

The main source of evidence relating to the proposals is:

- Maritime NZ's internal mid-point funding review, informed by the implementation of the Maritime Operating Safety System (MOSS) and seafarer certification (SeaCert) systems
- Public consultation was carried out on Maritime NZ's proposed changes to fees and the maritime levy.

One risk is that the analysis relies on data from MOSS and SeaCert that is nearly 2 years into a six-year implementation. Both are expected to be fully implemented by 2018/19.

The scope of this Regulatory Impact Statement is determined by that of the scheduled mid-point funding review, which addresses:

- MOSS and SeaCert fees
- Maritime levy

A review of all of Maritime NZ's income and expenditure was carried out in the last full funding review in 2011/12 and will be revisited in the next full funding review scheduled for 2018/19.

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Executive Summary

Mid-point funding review

1. Maritime NZ has carried out a mid-point funding review, scheduled between full reviews in 2011/12 and 2018/19. It coincides with the introduction of the Maritime Operating Safety System (MOSS) and seafarer certification (SeaCert).
2. The mid-point review found that Maritime NZ is not recovering sufficient income from fees and the maritime levy to cover all costs associated with its statutory role. The current shortfall of \$3 million per annum will increase in subsequent years if scheduled maritime levy reductions are implemented.
3. The purpose of the mid-point funding review is therefore to explore options, within the scope of the review, to return Maritime NZ to a sustainable financial footing whilst continuing to deliver Maritime NZ outcomes especially the successful delivery of MOSS and SeaCert. A public consultation document, released for comment in November 2015, outlined proposed changes. If approved, the revised fees and maritime levy would take effect from 1 July 2016.
4. This regulatory impact analysis considers five options to address Maritime NZ's funding, the preferred option being a combination of fees and levy adjustments.
5. The preferred option involves:
 - 5.1 an increase to MOSS and SeaCert fees (\$0.22 million per annum) and the maritime levy (\$1.4 million per annum); and
 - 5.2 not to proceed with the planned levy reductions
6. The proposed fee and levy increases take account of \$1.32 million in efficiencies and cost savings that Maritime NZ has already implemented.
7. The preferred option would deliver the funding needed to return Maritime NZ to a break-even position by 2016/17 and maintain that position through to the next full funding review in 2018/19.

Status quo

Maritime NZ's role

8. Maritime NZ is the national maritime agency with the primary role in regulating maritime safety, security and marine environment protection. Maritime NZ oversees and enforces domestic ship and operational safety requirements for the approximately 3,000 New Zealand commercial vessels and 1,800 maritime operators that are not subject to international safety standards.
9. MOSS and SeaCert are crucial to Maritime NZ moving to become a risk-focused intelligence-led regulator.
10. MOSS replaced the previous Safe Ship Management (SSM) system for New Zealand's under which oversight of operators safety systems were outsourced to commercial providers. Under MOSS Maritime NZ now directly undertakes regulatory audit and oversight functions. It improves safety outcomes through greater operator accountability and a more direct relationship between the regulator and operators.

11. SeaCert modernised the qualifications framework for seafarer licensing in New Zealand, to reflect changing industry needs, provide flexibility to adjust to technical developments, improve career pathways and implement changes to international convention requirements for seafarer certification.
12. MOSS and SeaCert were introduced after the 2011/12 funding review. At that time, it was projected MOSS and SeaCert would be fully self-funded through fees.

Maritime NZ's funding sources

13. Maritime NZ's funding comes from the following sources.

Table 1: Sources of Maritime NZ funding for regulatory and compliance activities

Funding source	2014/15 (\$000)	%	Use
Maritime levy	17,465	54.9%	Common good activities that support the maritime system, e.g. navigation aids and regulatory functions
Crown funding	10,262	32.3%	Public good activities such as policy advice.
User fees	2,779	8.7%	Revenue for activities with a private benefit, e.g. licensing, certification, audits and approvals
Other sources	1,293	4.1%	Includes management fees, investment income.
Total	31,799	100%	

14. Maritime NZ charge the levy to commercial operators to meet the costs of some the Maritime NZ functions. Charges are based on vessel tonnage, passenger capacity or vessel length.
15. This excludes Maritime NZ's marine oil spill response capability, search and rescue coordination functions, and recreational boating activities, which are separately funded and outside the scope of the mid-point funding review.

Maritime NZ's Mid-point funding review

16. The Maritime NZ mid-point review was confined to Maritime NZ regulatory and compliance functions. The review:
 - 16.1 examined specific areas of work to ensure the levy and fees recover and apportion the full cost of this work
 - 16.2 considered whether staff effort and pricing assumptions for the fee and levy decisions derived from the 2011/12 full funding review remain appropriate following the introduction of MOSS and SeaCert
 - 16.3 addressed any related funding pressures

Findings of the mid-point funding review

17. The review found that the original assumptions of workload were wrong. Relying on web based information and seminars was inadequate, it did not give operators and seafarers sufficient information to adequately complete entry requirements and to be aware of their responsibilities. Operators and seafarers were less prepared for entry into the MOSS and SeaCert than expected and there was significant broader work in

developing these new systems. To achieve the safety benefits expected required more assistance to operators, more risk analysis and operational policy.¹

18. This additional work has resulted in a funding shortfall of \$3 million per annum. The shortfall will increase by \$0.699 million in 2016/17, \$1.320 in 2017/18 and by \$2.300 million in 2018/19, if Maritime NZ implements scheduled maritime levy reductions.

Main areas of funding pressure

Additional non fee-able work

19. This relates to MOSS and SeaCert entry, SeaCert renewals, and MOSS audits. There are two areas of additional work where Maritime NZ is not charging fees:
 - 19.1 High demand for direct one-to-one assistance (assisted compliance). This approach involves higher costs than the 'one-to many' approach envisaged in the systems design, and applied in line with Government's expectations for public sector agencies to move predominately to online engagement.
 - 19.2 Higher than expected enquiries on how the entry, renewal and audit rules are applied in specific situations leading to additional risk analysis, operational policy and standards development work. This direct engagement has led to additional risk analysis, operational policy and standards development.
20. This additional work has enabled operators and seafarers to understand how to meet safety requirements and to operate safely. It is expected this assistance will help improve overall safety and reduce future compliance costs (given operators will be more knowledgeable about audit requirements).

SeaCert fee revenue under-recovery of costs

21. An effort review of the SeaCert revealed that the original assumption of effort to complete these applications was wrong. The applications have taken on average an hour longer than expected and so costs are more than is recovered through the fixed fees. A key reason was that many applications for seafarer certification involve complex assessment of seafarers' individual situations.

International work

22. Additional work on the negotiation and maintenance of international agreements and relationships, the club good benefits of which accrue to maritime operators (particularly international commercial operators) but for which costs are under-recovered through the maritime levy.

Measures taken by Maritime NZ to respond to funding pressures

23. Maritime NZ has responded to its funding pressure by:
 - 23.1 general efficiency gains and cost cutting
 - 23.2 diverting resources from other statutory functions
 - 23.3 using cash reserves
24. Since the 2011/12 review, these measures have resulted in significant savings, which now stand at \$1.6 million annually, from:

¹ This RIS focuses on MOSS and SeaCert changes, as they are the majority of funding required.

- 24.1 consolidating the Head Office footprint, saving \$300,000 annually
- 24.2 process and workflow improvements for SeaCert and MOSS, saving \$134,000 annually
- 24.3 more flexible arrangements for the sourcing of legal and policy expertise
- 24.4 adoption of a vehicle leasing model
- 24.5 Transport Collaboration and Capability Strategy initiatives, involving:
 - 24.5.1 online invoice approval and processing system leveraging off a solution already implemented by NZTA.
 - 24.5.2 partnering and cost sharing with NZTA for IT security support
 - 24.5.3 share a payroll staff member with the Ministry of Transport
 - 24.5.4 joint venture with the Civil Aviation Authority to host IT infrastructure.
- 25. These measures enabled Maritime NZ to reduce its 2014/15 expenditure by 8% compared to forecast (actual: \$33.5 million / forecast: \$36.2 million). These 2014/15 savings were largely offset by lower than forecast fee revenue, particularly from MOSS.
- 26. An annual funding deficit of \$1.4 million remains. The Ministry of Transport is satisfied that the potential for further savings from operational efficiencies is insufficient to meet the current funding shortfall (and definitely not the future funding shortfall if the scheduled levy reductions occur).

Problem definition

- 27. The problem Maritime NZ faces is that:
 - 27.1 concerns about effective delivery of MOSS and SeaCert have lead to additional work (assisted compliance and risk analysis, etc). This has lead to insufficient funding to deliver other Maritime NZ outcomes with possible safety effects.
 - 27.2 fully charging by fees for additional MOSS and SeaCert work could risk reducing willing compliance and create safety issues in the maritime system.

Objectives

- 28. In determining an appropriate response to the problems Maritime NZ faces, the objectives of the mid-point funding review are as follows:
 - 28.1 Set sufficient fees and levies to cover costs until the 2018/19 full review
 - 28.2 Delivery of Maritime NZ safety outcomes, especially the successful implementation of MOSS and SeaCert
 - 28.3 Fees and levies are efficient and equitable (i.e. as per charging guidelines, setting the right pricing signals, reflect a fair and reasonable contribution to Maritime NZ activities)
 - 28.4 Simple fees structure with transaction costs minimised.

Regulatory impact analysis

29. Maritime NZ considered a range of regulatory and non-regulatory options. The non-regulatory options considered were whether Maritime NZ could meet its obligations without any additional funding.
30. Two options were considered and rejected early on and were not analysed as options in the RIS.
31. The option of not proceeding with MOSS and SeaCert was considered and rejected. MOSS and SeaCert are crucial to Maritime NZ's aim to become a more risk-based regulator. A number of independent reviews suggested Maritime NZ change from being an outsourced, prescriptive and transaction-focused regulator². In response, Maritime NZ moved to being a risk-focused intelligence-led regulator. The key to these changes is the development of MOSS and SeaCert. MOSS and SeaCert require more operator responsibility within the maritime industry and for Maritime NZ to be more directly involved in encouraging operators and seafarers to improve the quality of their compliance.
32. The option of reducing the amount of work on MOSS and SeaCert was also considered and rejected. Not completing the additional work would mean operators would be less prepared and knowledgeable of safety systems, and Maritime NZ's ability to tie its operational interventions to strong risk analysis would be constrained. From a regulatory and compliance perspective, it makes sense for this work to continue, as not doing so could undermine the safety outcomes that MOSS and SeaCert are intended to deliver.
33. The options considered were:
 - 33.1 meeting the shortfall by efficiencies and reprioritisation;
 - 33.2 increasing fees only;
 - 33.3 increasing the maritime levy only;
 - 33.4 obtaining Crown funding; and.
 - 33.5 a mixed option (combination of fee and levy increase).
34. To consider 'who should pay' an independent consultant Castalia was employed to provide advice on to ensure treasury guidance was followed.

Option A: Status quo – efficiencies and reprioritisation

(not recommended)

35. This option would leave Maritime NZ's levy, fee and Crown income unchanged. Further efficiencies, cost cutting and resource reprioritisation would be required to fund MOSS and SeaCert.
36. The status quo is not considered feasible, because it would:
 - 36.1 provide insufficient funding for Maritime NZ to carry out its regulatory functions

² Transport Accident and investigation commission reports, Review of Maritime's Safe Ship Management System and Government initiatives resulting in changes in the regulator model used in New Zealand.

- 36.2 render Maritime NZ increasingly unable to meet performance targets set by the Minister of Transport.
37. Maritime NZ has been reprioritising funding to ensure MOSS and SeaCert have sufficient funding. This has diverted resources from other activities. Maritime NZ's quarterly report (30 June 2015), showed the diversion of resources has resulted in Maritime NZ not meet targets for inspections of 'priority one' foreign vessels; intelligence-led operations targeting non-compliant operators; operations focusing on systems to prevent collisions, groundings, and fires; compliance checks of recreational boating. This option could reasonably be expected to further reduce performance in these other areas.

Regulatory options

Option B: Adjustment to MOSS and SeaCert fees

(not recommended)

38. This option relies solely on increases to MOSS and SeaCert fees. SeaCert fees are for certificates of competence and proficiencies that enable seafarers to obtain work (e.g. qualified deckhand, coastal skipper). MOSS requires operators to develop a Maritime Operating Plan. The MOSS fee is for Maritime NZ to examine the Maritime Operating Plan and provide a Maritime Transport Operating Certificate that provides entry into the maritime system.
39. At the last funding review in 2012, it was assumed that MOSS and SeaCert would be self-funding by raising fees from the operators and seafarers that directly benefit from the introduction of these systems. This would allow the levy to be progressively reduced.
40. During this review, it has become obvious that there has been significant unexpected work that has benefited the whole system more than just the individual operator or seafarer. The additional work has enabled Maritime NZ develop clear guidance to various types of operators and seafarers to enable them to undertake their responsibilities and to share industry good practice and expertise. The additional information provided by operators and seafarers has enabled Maritime NZ to undertake risk analysis and improve its operations policy and standards development.
41. Overall, the additional work was considered to be for the maritime industry as a whole and not just a direct benefit. It follows that the additional work is more of a club good to be paid for by the levy rather than self-funded by fees alone. Feedback from industry is that the assistance has been appreciated; it is helping them enter into the MOSS and SeaCert systems.
42. The consultation document proposed 1 July 2016 increases in MOSS and SeaCert fees of 29% and 31%, respectively. This would raise annual income from fees to \$3.5 million (approximately 10% of Maritime NZ's total revenue).
43. If the consultation document's proposal to raise an additional \$1.4 million from levy increases was instead also funded from fees, additional increases in operator and seafarer fees of 30% to 50% would be required. The aggregate increase in fees over current levels, depending on the levy rate concerned, would be 60% to 80% over current levels.
44. This option is therefore not recommended because:

- 44.1 Fees would not be efficient and equitable as it would be charging operators and seafarers some indirect costs that should more appropriately be levy funded
- 44.2 Maritime NZ would be unlikely to raise sufficient revenue as the fees would be so high there would a substantial risk of non-payment
- 44.3 This level of fees would reduce willing compliance and could lead to poorer safety outcomes.

Option C: Adjustment to maritime levy only

(not recommended)

- 45. This option relies solely on increasing the maritime levy (and not proceeding with scheduled levy reductions).
- 46. The levy applies to all New Zealand commercial vessels and international vessels visiting New Zealand. The levy is currently funded 71% from international non-passengers vessels, 20% from foreign passenger vessels, and 10% from New Zealand vessels. Maritime NZ use the levy to pay for regulatory services for the maritime industry such as aids to navigation, the distress and safety radio network, and safety education.
- 47. Increasing maritime levy rates to cover the operating deficit, along with cancelling scheduled reductions, would provide sufficient revenue for Maritime NZ to meet its regulatory obligations.
- 48. However, this approach would not result in efficient and equitable fees. Modifying the levy allocation and increasing some SeaCert fees would send better pricing signals and more fairly differentiate between club and private benefits.
- 49. An increase in the levy under current allocations will fall mainly on the international vessels. It is fair that all vessels should pay to maintain the overall system but there should be some recognition that domestic operators receive more direct benefits.
- 50. In addition, an effort review has shown that the SeaCert fees are not covering the full direct costs of processing SeaCert applications.

Option D: Crown funding

(not recommended)

- 51. This option relies on Crown funding to address Maritime NZ's funding shortfall. No adjustments to the maritime levy or fees would take place. An associated Budget bid, if successful, would provide Maritime NZ with sufficient revenue to maintain its cash reserves and deliver on its outcomes.
- 52. Consideration of changes in Crown funding was outside the scope of the mid-point funding review, and will be within the scope of the next full funding review in 2018/19.
- 53. Notwithstanding, the public consultation revealed that some in the industry, particularly international operators, believe that the Crown should contribute more to Maritime NZ's funding, particularly in the areas of risk analysis and operational policy.

The additional work required had more of club good characteristics than public good, i.e. the benefits were more for industry rather than the general public. Crown funding was therefore not considered. However, at the full review in 2017/18 the amount of crown funding for Maritime NZ will be re-considered.

Option E: Combination of fees and levy adjustments (preferred)

(recommended)

54. This option consists of:
 - 54.1 Halting further planned maritime levy reductions for international operators
 - 54.2 An increase in the levy of \$1.4 million per annum to pay for MOSS and SeaCert additional assisted compliance work and additional risk analysis, operational policy and standards development work
 - 54.3 Increasing the SeaCert hourly rate by 31 percent to ensure the direct costs for SeaCert are covered by fees.
55. A detailed breakdown of all proposed fee and levy rates, and other financial information, associated with this option is outlined in the Appendix.
56. *Maritime levy:* The largest proposed changes are the \$1.4 million increase to the maritime levy rates. It is proposed to fund Maritime NZ's assisted compliance activity, risk analysis and operational policy from the levy, because this activity provides wider benefits to all participants.
57. International operators (such as cargo ships and cruise liners) will pay 5 percent more than in 2015/16, and if you include the halt on the further planned levy reductions, the change equates to a 21% increase. The overall proportion of the levy paid by international operators (passenger and non-passenger) will remain high (currently paying 91% of the levy, they would pay 89% by 2018/19).
58. The impact for an international container ship (37,000 deadweight tonne (DWT) 3 port vessels) is an increase of \$33 per voyage. While for an international cruise ship (2000 passengers 6 port visits) has an increase of \$1,800 per voyage.
59. Domestic operators have a targeted increase of \$0.2 million per annum for small to medium domestic operators to cover MOSS assisted compliance given they receive more direct benefits from this work. The increases range from 16% for a domestic passenger vessel to 66% for fishing vessels.
60. The impact for a domestic passenger (500 passengers) is an increase of \$16,395 per annum. While the increase for a large deep sea-fishing vessel is \$2,282 per annum, and for a fishing vessel (6 metres) is \$32.58 per annum.
61. *Fees:* This option also proposes to increase SeaCert fixed fees to ensure that the direct processing costs are covered. This would bring the hourly rate into line with that applying to other Maritime NZ services.
62. For seafarers the SeaCert fixed fees would increase from between \$83 to \$260 per certificate (a 31% increase). One of the most common applications is for a skipper's certificate, which would increase from \$761 to \$995.
63. This option is recommended because it:
 - 63.1 Sets fees and the levy so sufficient funding will be collected for Maritime NZ to complete its regulatory programme
 - 63.2 Enables the successful delivery of MOSS and SeaCert by providing sufficient funds in a way that doesn't unduly affect willing compliance

- 63.3 Endeavours to set appropriate pricing signals by increasing SeaCert charges and directing some of the MOSS costs to domestic users.

Consultation

64. In November 2015, Cabinet agreed to the release of Maritime NZ's consultation document, *Proposals to Make Changes to Maritime New Zealand Fees and the Maritime Levy for 2016-19*, for the mid-point funding review, subject to Maritime NZ taking an open book approach to consultation [EGI-15-MIN-0133 refers].
65. The consultation document, including detailed financial information, was released for public consultation from 20 November 2015 to 22 January 2016. During the consultation period, Maritime NZ completed a series of 8 public seminars in Wellington, Auckland, Tauranga, Napier, Nelson, Christchurch, Dunedin, and Invercargill. Attendees were reminded that an open book approach was being taken and Maritime NZ would provide further information if requested. The mid-point funding review also included discussions with industry representatives of the maritime sector in New Zealand.
66. A number of responses also questioned fundamental aspects of Maritime NZ's funding which would more properly be addressed in a full funding review.

Submissions

67. Maritime NZ received 14 written responses to the consultation document. Five were from industry representative organisations – New Zealand Shipping Federation, Cruise New Zealand, Tourism Industry Association, New Zealand Marine Transport Association, and New Zealand Federation of Commercial Fishermen. The remaining submissions were from individuals or companies.
68. No submissions were received from or on behalf of international non-passenger ship operators despite the impact of cancelling the scheduled levy reductions and increasing the levy rate being greatest for this group, which generates 71 percent of total maritime levy revenue. In addition, no parties took up the opportunity to request further financial information.
69. The main themes raised by submitters were around 'who should pay'. Maritime NZ was aware that this would be a contentious issue and employed an independent economic consultant (Castalia) to help examine Treasury and Audit office guidance on 'who should pay'. Submissions focused on the following areas:
- 69.1 MOSS and SeaCert additional costs: Some submitters suggested MOSS and SeaCert fees were already too high and further fees to meet additional costs would negatively impact the industry. Others thought that some levy payers were already paying more than their fair share.
- 69.2 Maritime levy: Some submitters suggest the levy is inequitably allocated and some industry groups are being unfairly targeted. Some comment was based on an inaccurate view of the reason or basis for allocation. A common complaint is that 'ability to pay' is the only rationale, although the overall allocation is actually based on risk. However, there is a shortage of hard data on the correlation between risk and levy allocation. One apparent anomaly in the levy allocation model stands out – NZ non-SOLAS³ passenger ferries (e.g.

³ SOLAS stands for Safety to Life at Sea an international convention. Basically, the larger domestic ships need to meet this convention while the smaller ships do not.

medium size ferries crossing other areas, e.g. Auckland to Waiheke, who carry millions of passengers) pay less than NZ SOLAS passenger ferries (e.g. large ferries crossing the Cook Strait).

- 69.3 Maritime NZ agrees there is a need for a review of the levy allocation, and therefore plans to initiate a Maritime Levy Model Project in 2016. The results will inform the 2018/19 full funding review.
- 69.4 MOSS and SeaCert fees: Some submitters consider that MOSS and SeaCert fees are too high and the systems are costly and difficult to deal with. These submissions are counter-balanced by others that say system process costs and fees have been less than first thought.

Conclusions and recommendations

- 70. Based on the analysis above, 'Option E' (Combination of fees and levy adjustments) is preferred, as it matches or exceeds the other options outlined with respect to the four objectives.
- 71. This option is also preferred because it will put Maritime NZ on a sustainable financial footing that will enable it to discharge its range of statutory functions under legislation.

Implementation

- 72. The Ministry of Transport will lead the legislative change process to enable Cabinet's decision as to preferred option. Depending on the option chosen, amendments to the following regulations would be necessary:
 - 72.1 Shipping (Charges) Regulations 2014
 - 72.2 New regulations under the Maritime Security Act 2004
 - 72.3 Marine Safety Charges Regulations 2000
- 73. Maritime NZ would implement the fees and levy changes. Affected parties would receive advance notice of the changes that are proposed to come into effect on 1 July 2016. Maritime NZ will keep stakeholders informed of changes through its website, publications and the Sector Reference Group.

Monitoring, evaluation and review

- 74. Monitoring, evaluation and review of any changes to Maritime NZ's direct fees and the levy that may result from this proposal will be undertaken as part of the existing three-year review cycle for Maritime NZ funding. The full funding review is due to be undertaken in 2018/19.

Appendix: Preferred Option fees and levies breakdown

Proposed total increase in the maritime levy and SeaCert fees

The increase in budgeted levy revenue from 2016/17 to 2019/20 (based on estimated 2015/16 volume figures and levy rates) would be as follows.

Table 1: Maritime NZ proposed total increase in levy and SeaCert fees

(includes halt in further levy reductions for international operators and the 2016/17 seafarer certification application spike)

Maritime NZ forecast revenue (\$000's)				
Financial year	2016/17	2017/18	2018/19	2019/20
Forecast Expenditure	36,112	33,985	33,236	33,795
Forecast Revenue	32,340	30,939	29,580	29,658
(Deficit)/ Surplus	(3,772)	(3,046)	(3,656)	(4,137)
Funded by:				
Increase in SeaCert fees (BAU & 2016/17 seafarer certificate applications spike fees, additional to budgeted revenue at the Year 2 rate)	1,716	220	219	230
Halt further planned levy decrease (on international operators under proposals 1,2,3, 6)	669	1,318	2,292	2,292
Levy increase (under proposals 2 and 3 - on domestic operators for MOSS and on all levy payers for SeaCert for assisted compliance; on all levy payers for MOSS and SeaCert risk analysis, operational policy and standards development)	1,387	1,508	1,145	1,615
Total increase in fees and the levy	3,772	3,046	3,656	4,137

Table 2: Maritime NZ proposed levy rate changes

Industry Group	Basis of levy	SOLAS category	Number of vessels	Estimated 2015/16 Levy (000s)	% of Total Levy	Proposed annual increase	% proposed NEW increase	Proposed NEW Rate	
International non-passenger ship	First Port DWT	SOLAS	2266	8,266	46.87%	425	5%	0.1108	
	Subsequent Port DWT		3529	4,271	24.22%	220	5%	0.0376	
International passenger ship	Passenger Capacity per vessel per port visited		99	3,550	20.13%	183	5%	3.09	
TOTAL INTERNATIONAL				16,087	91.22%	828	5%		
New Zealand non-passenger ship	DWT		10	274	1.55%	44	16%	2.46	
New Zealand passenger ship	Passenger Capacity per vessel		5	665	3.77%	106	16%	238.14	
New Zealand fishing ship	Gross Tonnage Length		NON-SOLAS	62	185	1.05%	122	66%	4.11
				973	88	0.50%	58	66%	13.70
New Zealand domestic passenger	Gross Tonnage Length			40	40	0.23%	26	66%	5.14
				1022	116	0.66%	76	66%	17.11
Other New Zealand vessels	DWT	1		1	0.01%	1	66%	2.62	
	Gross Tonnage Length	83		73	0.42%	48	66%	5.14	
		1262		105	0.59%	69	66%	17.11	
TOTAL DOMESTIC				1,548	8.78%	550	36%		
TOTAL LEVY					17,635	100%	1,378	8%	