

**Summary and description of  
submissions**  
to the Ministry of Transport  
on

*Sea Change*  
Transforming Coastal Shipping  
in New Zealand

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# 1. Introduction and Background

This report summarises and describes the 58 submissions received by the Ministry of Transport in response to its discussion document *Sea Change: Transforming Coastal Shipping in New Zealand*, which was released in November 2007.

There was universal support for a *Sea Change* strategy with established targets, although views diverged as to what were appropriate targets and what is needed to meet them. Detail from these submissions will be used to inform the development of the work programme implementing the *Sea Change*.

## ***Responses to invitation to make a submission***

Fifty-eight responses to the invitation to make submissions were received by the Ministry of Transport.

Submissions were made by:

### **Local and Regional Government**

Regional Councils – 10

Territorial Local Authorities – 6

Local Government NZ - 1

### **Commercial Interests**

Bodies Representing Sector Groups – 12

Commercial Shipping Companies – 5

Commercial Transport/Freight operators – 4

Other commercial company – 1

Port Companies – 7

### **Representative Groups**

Employee Organisations – 2

Professional Body – 1

### **Other**

Regional tourism organisation – 1

Individuals – 8

Consultants – 1

Iwi Group – 1

## ***Structure of responses***

Respondents were able to make their submission using a template provided by the Ministry of Transport (attached in Appendix One). Nineteen respondents did so. Others chose to make their response outside of this format.

## **Key questions**

Respondents were able to structure their submissions around the following 24 key questions contained in *Sea Change*:

- Q1 What other significant contributions do you see the draft domestic strategy being able to contribute to achieving New Zealand's desired transport, energy and environmental outcomes?
- Q2 What steps could be taken to lessen any negative environmental impact of increased levels of shipping?
- Q3 What do you think would be an appropriate name for the unit?
- Q4 Are there any other tasks the MLU could undertake?
- Q5. What other factors should be considered in determining the location of the MLU?
- Q6 What types of proposals, not currently receiving government funding, could benefit from alternative and/or additional funding?
- Q7 What criteria should apply for funding?
- Q8 What limitations should there be on funding?
- Q9 What are your views on the issues relating to capital funding?
- Q10 How should the capital funding issues be addressed?
- Q11 If central government funded capital improvements to shipping, who should own the assets?
- Q12 How should any capital improvements be reflected in port charges?
- Q13 What are appropriate sources of funding for maritime services (eg, industry, road users, or taxpayers)?
- Q14 What should be the administration arrangements for any funding?
- Q15 Should there be a dedicated fund? Why?
- Q16 What processes and/or mechanisms should be put in place to ensure monitoring/review of any funding?
- Q17 Where should any maritime transport fund be administered and why?
- Q18 What should be the administrative arrangements for any funding?
- Q19 Which organisation should have responsibility?
- Q20. What sort of information relating to the coastal shipping strategy could usefully emerge from the future work?
- Q21 What are possible sources of useful data? In particular, what data can the sector provide that would assist?
- Q22. What other workforce matters need to be considered?
- Q23 Who needs to be involved in workforce development?
- Q24 What other long term issues should be on the Ministry of Transport's work programme?

Respondents also expressed views on other matters related to the discussion document. These have also been analysed and are included in this report.

## **2. Analysis and reporting method**

Comments made in submissions were coded into ten major categories:

1. Overall response to the strategy
2. Comments on intermodal approaches
3. Comments on issues relating to ports and port arrangements
4. Comments on the proposed Maritime Liaison Unit
5. Comments on funding issues
6. Comments on information gathering
7. Comments on workforce issues
8. Comments on s198 of the Maritime Transport Act

9. Comments on environmental issues
10. Other comments

### **3. General comments on the strategy**

There were 138 comments received that were about the strategy in general.

#### ***Support***

Overall, the submitters welcomed and supported *Sea Change* with 36 explicitly expressing support for the strategy. Other submissions which did not explicitly state support for the strategy, implied support in comments on the content of the strategy.

For example, Pacifica Shipping stated that "...the major contribution [that the strategy will make] will be coastal shipping investors and operators having confidence and capability to expand scheduled inter-regional sea freight services, supported by government funding for overdue investment in new vessels, port infrastructure and training resources."

#### ***Suggestions for enhancement***

Other submitters expressed various views as to how the strategy could be enhanced:

For example, Toll Consolidated expressed the view that the strategy is "...overly aspirational and provides insufficient detail as to how proposed targets or initiatives will be achieved". Lewis Rivers thought the strategy had limited usefulness because it "...does not address or seem to provide the avenue for addressing the major issues of capital, stock, infrastructure and workforce. Without these issues being fully addressed the domestic sea freight pathway will remain as is or it will atrophy."

The Waikato Regional Land Transport Committee supported this, stating: "There are a number of issues surrounding the draft strategy which need to be further clarified to ensure the New Zealand Coastal Shipping Strategy can deliver on its desired outcomes." In particular, this submitter noted that "the role of local government has not been clearly set out in the document".

#### ***Concern about the strategy***

The Road Transport Forum, while expressing support for the development of a domestic sea freight strategy, also expressed strong dissatisfaction with *Sea Change*. They were "disappointed to note the superficial thinking displayed in the draft strategy". They further stated "it is disturbing to observe that the Ministry has published the draft strategy in the absence of adequate, credible evidence and without a reasonable understanding of the freight market".

## 4. The proposed target

There were 57 comments received on the target “for coastal shipping to be carrying at least 30 percent of all inter-regional domestic freight in New Zealand by 2040<sup>1</sup>”.

### *Support for target*

Seventeen comments supported the target as not only a good target, but one that was achievable.

Nick Barber stated that setting the goals was “excellent”; Quadrant Pacific Ltd stated that “the target was commendable”; and Port of Tauranga stated: “The Ministry of Transport is to be congratulated on the aspirational goal of doubling the volume of inter-regional freight carried by coastal shipping.”

### *Implementation and interim targets*

The general support in these 17 comments was accompanied in five cases by the comment that, not only does a target need to be set, but an implementation plan is needed to ensure it is achieved.

One of the key aspects of any implementation plan was seen as setting interim targets. For example, Venture Taranaki stated that they supported the target and added that “...an aggressive interim target for 2020 would maintain momentum to ensure the initiative is exceeded”.

A specific plan that would set out how the target would be achieved was also seen as necessary. For example, SmartGrowth stated that they “...support the action plan but would like to see clearer and more specific actions developed with responsibilities, timeframes and funding assigned to each”.

Three comments stated that the target could not be reached without investment in the industry being made. For example, the Meat Industry Association believed that, “...investment in supporting infrastructure will be required in order for coastal shipping services to be (more fully) utilised”.

One comment expressed conditional support for the growth target. IPC and Associates stated that they were “...totally supportive providing that modal interchange does not drive costs to unacceptable heights”.

### *A more ambitious target*

Twenty-six comments stated the target was not aggressive enough, and that more could be achieved more quickly:

For example, Cubic Transport Services believed, “...the 30 percent target should be in place tomorrow”. Shipping New Zealand wrote in their submission “...**we consider this to be far too long**” [their emphasis]. CentrePort stated that, in their view “...the current goal is insufficiently ambitious”.

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<sup>1</sup> Sea Change page 23

Fourteen of these 26 comments specifically stated that they believed the target set by the Ministry of Transport could be reached more quickly:

Coast All Services Ltd stated that the 30 percent target should be brought forward to percent by 2020 as this would be consistent with other European initiatives already underway. They believed that the shortened target was achievable.

Port Taranaki similarly stated that we need to align ourselves with Europe. They stated: “The northern hemisphere, especially Europe and USA (which includes supply chains with which New Zealand competes) is already well down the track of investing in coastal shipping strategies and is set to reap economic and environmental advantages well before us. New Zealand should be targeting the year 2020 at the latest and raising the target higher than 30 percent.”

Pacific Link pointed out that, in their view, 2040 “is still some 33 years away” and they suggested a shortened timeframe as being a more “suitable” goal. The Ports of Auckland suggested a shorter timeframe because they believed the proposed target “...too modest and distant”. The Forum for Auckland Sustainable Transport expressed the view: “An intermediate goal of 30percent by 2025 would really help focus on the key actions needed to achieve substantial change relatively quickly.”

### ***Reservations about achievability and modal shift***

Fourteen comments indicated that the suggested target would not be achievable, or that it would have consequences for undesirable modal shift.

There were two reasons for this. One was that disbelief that the freight market’s growth will happen in the timeframe suggested. IPENZ stated in their submission: “*Sea Change* quotes the often-heard forecast that domestic freight will double over the next decade. IPENZ believes that freight growth may not be that fast.”

The other reason is a view that achievement of the target may represent a modal shift from rail to sea and not from road to sea, in which case the overall soundness of the strategy is questioned.

The Road Transport Forum thought the target was not achievable because they see it is at odds with stated government goals of achieving economic transformation. They feel such an increase in coastal sea freight movement would mean any increase in rail’s market share would not be possible.

They stated: “Given the government’s claimed objectives of achieving economic transformation and lifting New Zealand’s per capita incomes to the top half of the OECD, the aspiration that coastal shipping freight will be able to be grown from 15 percent of the market to 30 percent by 2040 accompanied by a similar increase in rail’s market share is difficult to understand or believe. The Forum wonders what evidence the government has that suggests this major increase in demand for non-time sensitive freight services will take place, because it seems to be at total odds with its stated economic objectives.”

Federated Farmers made a comparable comment. They thought the current target “ambitious” because: “*Sea Change* suggests that the target could be achieved without reducing freight being carried by other modes, saying it would be possible if the shipping industry were to grow faster than other modes over an extended period.”

Toll NZ Consolidated Ltd thought the target “...unrealistic and unlikely to be attained”. They thought the aim of moving freight from road to sea would not necessarily be achieved, and that some freight movement might be from rail to sea, not a desirable thing in their view. They stated

“...targets are too ambitious and could simply see freight move from rail to sea and not off road – the real target”.

## **5. Comments relating to an intermodal approach to domestic freight and modal shift**

There were 106 comments made about intermodality and domestic freight.

### ***Support for an intermodal approach***

Twenty-seven comments supported an intermodal approach to domestic freight in New Zealand.

For example, the Kaikoura District Council supported “...efficient use of different modes of transport to support freight movement”. Business New Zealand stated that they “...strongly endorse the concept of transport solutions reflecting what is optimal from New Zealand’s perspective”. Port Taranaki thought co-modality was “...absolutely crucial to New Zealand’s trading future”. Eastland Port stated: “Coastal shipping needs to be more integrated into intermodal supply chains.”

Six comments called for an intermodal approach that allowed the best mode or combination of modes with the best community and environmental outcomes:

Environment Canterbury in their submission called for provision of “..effective movement of freight in ways that are efficient, safe and sustainable”. The Wellington City Council pointed out in their submission that mode choices both now and in the future need to include “...technological developments... so that transport options can consider future trends in relative efficiencies and emissions”.

The support for intermodality in principle was accompanied, in three comments, by a call for support for connectivity between modes in order to allow intermodal transfers to be facilitated. Kapiti Coast District Council said: “There will need to be good connectivity between modes, with minimal delays and damage to freight at intermodal connections and terminals.”

All three comments called for funding and other support to enable improved connectivity. SmartGrowth suggested that “...the *Sea Change* strategy note the importance of connections between coastal shipping, major ports, industry and rail. Collaboration between these groups should be encouraged.”

### ***Funding to support modal choice***

Waikato Regional Land Transport Committee thought government funding to enable modal choice was important. They stated: “Government funding of domestic sea freight proposals as well as other proposals for the diversion of road-based modes should be based on analysis of the full range of impacts on all modes, taking into account economic, environmental, and social costs and benefits.”

### ***Impacts on rail***

Five comments were made that the effects on rail need to be considered when considering support for modal shift.

For example, the Auckland Regional Land Transport Committee in their submission supported the transfer of “heavy, bulky cargoes” from road to sea, but expressed concern that the impacts on rail

needed to also be considered. The Northland Regional Council supported this, stating: “*Sea Change* is about coastal shipping and improving use of that particular mode for freight transport. However, while linkage to other modes is mentioned, the effect of such a potential shift on the economically fragile national rail network needs to be considered in parallel.”

Toll, the operator of rail services in New Zealand, commented: “Toll fully supports an integrated approach to transport and actively promotes mode neutrality between the modes as a means to sustainable transport. We are a firm believer that freight should move on the broader, most sustainable and cost effective mode. Toll believes if this were done there would be a modal shift away from road to rail and sea since road costs in the broadest sense would rise due to the environmental and social consequences, eg the costs of CO2 emissions or road fatalities.”

### ***Need for trucking***

Cubic pointed out that any co-modal solutions will still involve metro pick up, and this requires trucking solutions. They stated “...metro pick-up and delivery is an integral part of the co-modality – rail and sea rely on local trucking. This should not be penalised.” Cubic further suggest that the MLU could function to mediate “...competitive behaviour not in the best interests of the country.”

### ***Need for a comprehensive strategy***

Two comments made the point that that this strategy needs to be linked into a wider policy environment. For example, Port Nelson stated: “Whilst PNL are supportive of the *Sea Change* draft strategy direction in general, we do believe strongly that any policy imperatives must be in conjunction with a combined New Zealand transportation strategy consisting of a comprehensive road/rail/sea strategy.”

## 6. Comments relating to ports

There were 56 comments made about ports in all submissions. The main issue was related to increased demands from domestic shipping, as proposed in *Sea Change*, and their impacts on ports facilities. Embedded in this issue are a number of other issues around port ownership and operation.

The key issues discussed were related to ports infrastructure and funding.

### ***Ports infrastructure***

There are some concerns over the impacts of increased levels of coastal shipping and their impacts on ports, with 12 of the total of 56 comments made about ports related to this issue. Local Government New Zealand considered that “This resurgence in coastal shipping will require not only a refocusing of business but a considerable investment in port infrastructure and facilities”. Lewis Rivers believed: “Any increase in coastal shipping will require an increase in handling facilities. Increases in handling facilities will require extensive planning and have a long lead in time.”

There was concern expressed over who should carry the costs of this investment, and whether these costs would be passed on to users of port facilities. Local Government New Zealand thought that: “The best way to achieve long term sustainable transport outcomes is by focussing investment into ports and port infrastructure.”

### ***Capital investment and port ownership***

It was recognised the situation is complicated, with difficulty arising from ownership of ports. As Local Government New Zealand expressed it: “Although ports are (in the main) operated by port companies, the majority share holding lies with local government. Not only do local authorities expect a return on the community equity tied up in ports but as shareholders they are generally not well-positioned to invest in port-related infrastructure. This infrastructure represents a significant sunk investment which generally has high associated operating costs.”

The Waikato Land Transport Committee felt that while it was appropriate for port companies to invest in capital improvement of ports “...where capital investment is required to achieve an environmental or other non-financial return, an alternative method of funding will be appropriate”. They further stated: “For schemes which lead to improved environmental or economic conditions, a contribution from government would be appropriate. For schemes where private sector interests are the main beneficiaries, it would be appropriate for them to contribute to the costs.”

Port of Tauranga felt the answer lies in “...partial privatisation of each port company, which we believe was originally envisaged by the Port Companies Act. This would not only release significant capital to be immediately made available for regional infrastructure projects, but it would also ensure future returns were more likely to meet the cost of capital.”

South Port expressed a similar view, suggesting what is required is an “...alteration of the existing model including legislating a transfer of a minimum port shareholding into commercial ownership and/or requiring all port board compositions to include a majority of commercial directors”. They suggested that this would correct the current situation in which port companies are not able to operate as successful businesses because of part ownership of some ports by regional government: “The current ownership and governance model of the New Zealand port sector is

restricting this objective (operation of every port as a successful business) from being achieved as a consequence of regional directives overriding commercial drivers.”

Mitsui OSK Lines believed: “The question of port ownership is in need of urgent overhaul. This failed to materialise during the port reform of 1989. We think it may require a change in legislation to more fully open the door on this subject.” South Port supported this and called for “...a review of the ownership and governance model of the New Zealand port sector... with the aim of ensuring no impediments for economic rationalisation exist”. Warwick Walbran also called for a review of the structure and ownership of New Zealand ports because, in his view: “There have been instances of some port companies acting in a way that is not in the nation’s best interest.”

### ***Ownership of port assets where government has assisted with capital***

Some comments made it clear that ownership of port assets developed from government funding should be in government hands. For example, Tim Frank commented: “The assets should be owned by a government organisation.”

The Hokotehi Moriori Trust in the Chatham Islands said they hoped for funds to enable capital investment in their ports and they “...encourage the government to take an ownership stake in this infrastructure, as this will keep the government in touch with economic issues on the Islands”.

Underlying this argument is the assumption that government ownership will mean profits made go back into the industry. This is supported by Coast All Services who believe: “The existing monopolistic position of ports allows them to engage in pricing to provide an excessive tax base to benefit the local councils.” This situation is not one that they want to see continue, and they see government subsidies for ports as not providing an answer. “Subsidising ports is not an effective solution as there is no guarantee that any port subsidy will be passed on to coastal shippers.”

Pacifica Shipping said: “Any new (port) infrastructure paid for by way of government grant should not increase port charges, but may reduce them.” This argument is supported by Shipping New Zealand. They state: “in answer to your question *how should any capital improvements be reflected in port charges?*, the short answer is – that they shouldn’t.”

The current system of port ownership according to Mitsui OSK. Lines are “wrong in principle”. This is because there is “no strategic plan from a national point of view”. They suggest central government overview is the answer.

According to the Maersk Line, “The ownership structure of ports in New Zealand is not providing a platform for improvements in productivity and unit cost.” The effect of this is that coastal shipping is unable to compete in cost terms with other modes. Maersk suggests: “We need to look at overseas modes where local government is the landlord with independent and professional terminal companies providing port services with competition in the form of multiple stevedores operating on the waterfront.”

The New Zealand Council of Trade Unions stated in their submission that, in their view, where capital is brought with public funds, ownership should remain public. Toll Consolidated supported this approach for central/regional government projects as well, expressing the view that ownership should reside with the investors.

### ***Over-investment in ports***

Mitsui OSK Lines state that there are “too many container ports in New Zealand” and that this represents “significant over-investment”. Njord agree, stating that ports are ‘to some degree over-capitalised’. South Port argues that “...if New Zealand is to achieve a globally competitive transport network, then rationalisation of the port sector will be necessary. A country of New

Zealand's size and population does not warrant 13 separately government-owned commercial ports, plus a sprinkling of other regional ports."

### ***Port costs and intermodal competition***

Commercial shipping operators saw increased levels of coastal shipping meaning improvements and expansions would be needed to be made to ports facilities. The investment required to improve port facilities was seen as potentially impacting on those user charges, putting shipping in an even more disadvantageous position when compared to other domestic transport modes. The New Zealand Shipping Federation stated "Your question on page 29 asked how should capital improvements be reflected in port charges? The answer is – that they shouldn't." Pacifica Shipping felt: "Any new [port] infrastructure paid for by way of government grant should not increase port charges, but may reduce them."

Pacific Link stated: "If capital improvement [in ports] is limited to use by coastal vessels, there should be no additional fee included within the port charges for use of the facility. One of the anomalies that have hindered the growth of coastal shipping is the fact that when a tonne of cargo arrives at port for export by road or rail it does not attract port charges, but if that same tonnage were to arrive by sea then it does attract a charge in the form of marine charges and berthage. We therefore submit that *Sea Change* funding should also be applied to subsidise these operational charges."

There were some comments made about port costs in relation to inter-modal competition. Coast All Services stated in their submission that "...the high cost of loading and unloading containers is the major barrier to increasing the utilisation of coastal shipping services. For instance, Toll has a cost structure to load or unload a container from a truck or rail wagon for less than NZ\$50. However, to complete the same exercise working through the monopolistic port structure, the costs are in excess of \$NZ200." In their view, the high cost of using port facilities is due to ports companies having a monopoly.

The Kaikoura District Council in their submission called for the government to intervene "...to ensure there is an economic advantage to using coastal shipping or the freight industry will not change their behaviour", and suggested that "port charges need to be consistent with road user charges".

One way of doing this would be for port profits to "stay in the area" rather than being "siphoned off under the guise of dividends or capital repayments to the various regional councils as it is at present", according to Mitsui OSK Lines.

### ***Hub and spoke solutions***

Eight comments were made on the hub and spoke model. Mitsui OS.K Lines stated: "The hub and spoke concept is, we believe, the answer." The Ports of Auckland believe: "No single initiative contained in *Sea Change* will have greater positive impact on coastal shipping than fostering of international hub ports in New Zealand. This will generate suitable base cargo volumes making coastal services more viable and competitive."

Local Government New Zealand support the concept in principle but urged caution in terms of giving effect to that concept in the New Zealand situation. They stated: "Our key concern is that the concept of hub and spokes will be interpreted at a superficial level as a requirement to reduce the number of ports. In our view, there are significant differences between type of cargo (e.g. bulk and containers) that affect decisions by potential carriers regarding best point of origin. Care must be taken not to transfer the requirements of one particular type of freight to another." They also express concern over "the longer term question around whether or not New Zealand can sustain a hub port or would these ultimately be located on the eastern seaboard of Australia?"

This possibility was also expressed by Business New Zealand. They felt that under this model: “While Auckland may well like to be the hub [for Australia and New Zealand] it is entirely possible that Brisbane wins out for the region as a whole.”

### ***Proposal to establish a new port***

Federated Farmers said they “...would support further investigation as to whether the South Island’s primary inter-island ferry terminal should be moved from Picton to Clifford Bay...The Federation believes there could be significant economic efficiencies.” These would be a quicker crossing with a more direct route, reintroduction of the fast ferry without environmental impacts and shorter road distance time for freight carriers between points south.

## **7. Comments on the proposed Maritime Liaison Unit (MLU)**

### ***Support for establishment of a MLU***

Support for the establishment of a MLU was expressed in 21 comments, with a number of other submissions discussing the unit and its functions. For example, Pacific Shipping did not make a specific statement of support, but said in their submission that they have a name preference for such a unit (Maritime Development Unit) and they list a number of roles and functions that they see as being fitting for this unit. Again, Port Taranaki in their submission did not make a specific comment of support for the concept, but comment on the proposed name and function for any such unit.

Only one comment expressly stated that there is no need for a separate Maritime Unit. This was Toll Consolidated who felt there “...needs to [be a] working together with all transport mode planners – not in isolation – not segregated planning”. However, Toll did make a number of suggestions with regard to both the name and function of a unit.

The only other caveats on establishment of a MLU was provided by Federated Farmers, who stated that they were “unsure whether the proposal as outlined would be best use of taxpayers’ money” and the Ports’ CEOs who stated that they supported the establishment of a MLU for “a limited period of say five years”.

Reasons given for supporting the establishment of a MLU included “support for informing of local government advisors and decision makers of the role coastal shipping can play in developing a sustainable, integrated transport network” (Christchurch City Council) and, in the view of Kordia: “The establishment of the MLU is deemed necessary in order to bring the [*Sea Change*] strategy to fruition.”

### ***Name for MLU***

There was little support for the proposed name – MLU - with only two comments expressing support for that particular name. Three submitters expressed the view that the proposed name was “too soft”. For example, the New Zealand Shipping Federation stated that “looking at the mission statement in the US equivalent, the Federation thinks that the words *Promotion* or *Development* would better capture the MLU’s objectives and the activities it is expected to undertake as set out in the *Sea Change* draft strategy”.

Port Taranaki stated that they would like a name that is “anything but” MLU, further stating “it should be more than a liaison unit. Port Taranaki strongly advocates the establishment of an entity that stands in equal bearing and influence with Land Transport NZ and OnTrack”. Other

suggestions were: Blue Highway Unit, Short Sea Shipping Bureau, Coastal Cargo, Sea Transport New Zealand, Sea Change Liaison Unit, Eco Transit New Zealand, Sea Change Unit, or a name with *promotion* or *development* in the title.

## **Function of MLU**

There were a variety of views expressed as to the function of any proposed unit.

Six comments the unit's role should be to provide leadership and support to coastal shipping, and have a proactive role.

For example, Federated Farmers said: "It might be useful to have a body to coordinate information flows and promote coastal shipping." This was supported by the New Zealand Shippers Council which considered that "...this unit has a primary role to promote coastal shipping including the interdependency of shipping with other transport modes." Venture Taranaki commented: "The MLU's primary role should be the development and promotion of coastal shipping co-modality initiatives to the benefit of national sustainability and competitiveness". The Auckland Regional Council stated that "the role of the MLU should be proactive as well as facilitatory".

The Meat Industry Association suggested altering the proposed second objective in Sea Change to read "consistent with the New Zealand Energy strategy and New Zealand's international climate change obligations, to foster awareness of the potential environmental benefits of using coastal shipping in particular, and green supply chains generally".

Environment Canterbury suggested the MLU should have a role in facilitating communication between regional councils, with "the MLU acting as a broker between regional councils to advance project proposals that have inter-regional benefits could go a long way towards addressing the perceived shortcoming of the current funding system". This was supported by Toll Consolidated who stated that one of the functions of the MLU could be "looking at regional development [including] managing R&D initiatives".

Three comments indicated that it should have an educative and marketing role in raising the profile of domestic shipping. For example, CentrePort expressed the view that the MLU should be "to assume the role of change agent". Environment Canterbury said "We strongly support the proposed role of the MLU in promoting awareness at regional and national level."

Several comments were made suggesting the MLU should work in the analysis of the issues facing the industry. Other ideas included managing funding, setting up and maintaining databases of information including schedules, liaison with operators and setting guidelines for measuring and monitoring of cargo volume data. CentrePort thought an important aspect of the role of the MLU should be "to improve the quality of data available for decision making in relation to the choice of transport modes".

Port Taranaki suggested the MLU be a body "...whose primary task is appropriate distribution of dedicated funds to achieve the objectives that *Sea Change* advocates". This was also supported by Njord and Tim Frank.

One specific task suggested by the Waikato Regional Land Transport Committee was that the MLU could "...prepare a Coastal Shipping Risk Management Plan which identifies potential risks and hazard awareness associated with domestic shipping activities and provides appropriate measures for avoidance or remediation".

## ***Situation of MLU***

There was divided opinion as to where the MLU should be situated, with five comments expressing the view that it should be situated within the Ministry of Transport and five stating that it should be located somewhere else. (Suggestions were that it be situated in Maritime New Zealand.) Two suggested an Auckland location (Njord and Pacific Link). The remainder of submitters made no comment on the location of the proposed MLU.

## **8. Comments on government funding issues**

This area received the most comment. It is clearly an area of concern for many.

There were two types of comments made about funding. The first was that levels of funding support for the industry are insufficient to enable the sort of growth *Sea Change* proposes. Comments in this category include suggestions for how additional funding could be added. The second is around administration of funding and perceptions that it is currently inadequate and failing to deliver.

### ***Overall funding levels and possible sources of funding***

Fourteen comments expressed a view that the overall funding levels are inadequate.

For example, in the view of IPC and Associates: “The current \$2 million lying with the National *Land* Transport Fund is farcical for maritime purposes.” Two submitters specified sums that they thought would be a reasonable level of investment in coastal shipping, with one suggesting \$200 million.

Two comments stated that funding is specifically needed for research. The Forum for Auckland Sustainable Transport believed: “A key role for funding is research, for example, into the types of vessels best suited to support a sustainable future, and pilot projects to trial different vessel types.”

Two comments called for funding for longer term projects. The Waikato Regional Land Transport Committee called for funding to be available to “ensure that large- scale schemes which may involve significant changes in national freight patterns” should be available. Pacific Shipping supported this, saying they supported “government funding for overdue investment in new vessels, port infrastructure and training resources”.

The New Zealand Shipping Federation commented that low uptake of the fund is due to “the present low level of funding available” which it sees as a “significant deterrent to the development of funding proposals.”

### ***Issues around administration and disbursement***

Eighteen comments expressed dissatisfaction with the way funding is currently being distributed to the industry.

For example, the submission made on behalf of the CEOs of 15 port companies stated: “The fact that the existing Land Transport NZ budget [approx. \$2 million] for sea freight assistance is under spent, and only two schemes have been approved, is a clear indication that something is wrong with the model.”

The New Zealand Shipping Federation agreed: “It is the current funding frameworks that restrict the ability of the coastal shipping industry and port companies to apply for funding to develop

services or ports infrastructure.” Lewis Rivers stated: “The current funding framework is clearly not working.” Federated Farmers, the New Zealand Council of Trade Unions, and the New Zealand Chambers of Commerce supported this view.

There were fourteen comments relating to the need for quality monitoring of how any funding is used, with suggestions being made that monitoring may be via milestone reports (6 comments), or via an audit or other independent monitoring organisation. These submitters felt that organisations/companies receiving any funding need to be transparently accountable for how that funding is or has been used.

For example, Pacifica Shipping thought: “Funds allocated must be accountable in terms of performance outcomes.” Alex Knowles agreed that “benchmark systems [are needed] to ensure that results are delivered. The NZ Shippers Council suggested that “funding has to be measured against the objectives for coastal shipping set out in the *Sustainable Transport* document [the discussion paper on the proposed Update of the New Zealand Transport Strategy]”.

The major concern expressed about management of funding was that funding is not easy to access.

The New Zealand Chambers of Commerce stated: “Currently there are barriers, or perceived barriers, for easy access to the Land Transport Fund. The fact that only two coastal shipping proposals have received government funding (totalling \$800,000) does not show a lack of appetite for the fund – it suggests that the current system is flawed.”

Warwick Walbran suggested that work needs to be done to “...identify the barriers to the take up of available government funding and proposing ways to overcome those barriers”.

There were concerns expressed about the impact of funding not reaching those in the industry who need it, with a comment that inability to access funding may impact on the viability of their operation. The West Coast Regional Council requested that a decision on future funding and funding processes be made to “ensure provision to assist financially the port infrastructure of smaller ports to maintain their on-going viability”.

Comments expressed differing views as to who should manage distribution of funding. Some thought it should be managed by Land Transport NZ, and some the new Maritime Liaison Unit (MLU). The New Zealand Shippers Council suggested in their submission that “initially Land Transport NZ could administer the fund with oversight from the Ministry of Transport given the Ministry is driving the *Sea Change* strategy.”

The CEOs of 15 ports in their submission thought the new Crown entity created by the merger of Land Transport NZ and Transit, the New Zealand Transport Agency, would be an ideal place for management of coastal shipping funding. They thought that it was best to keep regional councils out of these funding decisions and free to “determine what if any support they will provide coastal shipping operators”. Preference for MLU management of funding came from two shipping operators (Njord and Pacific Link Ltd) as well as one individual.

### ***Should there be a dedicated fund for coastal shipping?***

Nine submissions (Njord Ltd and Cargo Coordinators. Waikato Regional Transport Committee, NZ Shippers Ltd, NZ Council of Trade Unions, Pacifica Shipping, SmartGrowth, NZ Shipping Federation Ltd, Venture Taranaki and Pacific Link Ltd) expressed support for a dedicated coastal shipping fund.

The New Zealand Council of Trade Unions said: “Some funding will be necessary to ensure a sustainable New Zealand owned, managed and crewed coastal shipping industry. Currently the National Land Transport Fund has proven unable to provide this support.” Pacifica based their support on the following argument: “Scheduled shipping activities have very different operational and [therefore] business funding requirements compared to land-based transport activities.”

Three submissions did not support a dedicated fund.

IPC Associates did not support a dedicated fund as it may become: “...a target for *soft* uses and lack of transparency”. Tim Franks thought that “it would be better to allocate funding across all transport modes strategically”. Toll Consolidated said: “There should be a fund for all similar transport proposals rather than one specifically for coastal shipping.”

## ***Sources of funding***

In terms of sources for additional funding, the most commonly expressed view (15 comments) was that funding for the coastal domestic freight strategy needs to come from central government, perhaps from taxation, with eleven comments suggesting this approach.

The New Zealand Shipping Federation stated that they “...believe it might well be more politically acceptable for funding of coastal shipping to come from general taxation. This can certainly be justified, given the taxpayer funding spent on the development of rail infrastructure, and the fact that, according to the 2005 Surface Costs and Charges Study, road users meet only 62percent of the true costs of the road network.”

The Waikato Regional Land Transport Committee agreed that “...for schemes which lead to improved environmental or economic conditions, a contribution from the government (from road users and taxpayers) would be appropriate”.

Ten comments stated that funding for the coastal shipping industry should come from within the industry itself. Submissions supporting this view came from shipping operators, regional councils and the Road Transport Forum. The Road Transport Forum said “If government wishes to subsidise coastal shipping, under no circumstances should freight carted by road be taxed through Road user Charges to subsidise freight carted by coastal shipping.”

## ***Level playing field***

Seventeen comments related to ways of funding for different modes of domestic freight transport in New Zealand, and differences in those funding levels. There is clearly dissatisfaction with a perceived inequity.

The New Zealand Shipping Federation expressed the view that: “There has been very little funding made available for coastal shipping (eg a mere \$2 million pa to be shared between rail and sea freight in the NLTP for 2006/07), and Land Transport NZ had no criteria available, nor internal capacity, to encourage the development of coastal shipping or ports infrastructure.”

Eastland Port were concerned that: “Coastal shipping competes with other transport modes (road and rail) that have a history of subsidisation. To strengthen coastal shipping, this gap in government support needs to be overcome inevitably by either less subsidies for the identified transport modes or equal funding for coastal shipping and its operational environment (eg ports).”

This view was expressed by others who also felt that the domestic sea freight industry is not receiving the same levels of funding as other modes. Coast All Shipping stated: “Co-modality is important to coastal shipping. However, given the total cost via coastal transportation, it is a non-

competitive exercise relative to road and rail.” The New Zealand Shipping Federation said: “The government has made considerable investment in the road and rail network since 1999, whereas coastal shipping has received a significantly smaller government contribution.”

Pacific Link stated: “...we believe that if trucks and rail had to meet the full costs of the infrastructure used to provide the service, no subsidy would be required to attract freight to coastal ships.” Their view is that subsidies and funding support are giving other modes an unfair advantage over coastal shipping.

There were calls for this to change so that a level playing field could be in place.

Eight submitters thought that the market will determine the choice of mode, if it had a fair and free choice, if the playing field was level. The Wanganui District Council stated: “Transport is competitive, and the best model is one that allows real competition to remain.”

There were nine comments made which related to the need for a level playing field in which all modes could compete fairly for market share.

Njord said: “The main issue for coastal shipping is that there should be a level playing field for all modes of transport. Should there be any skewing of this level playing field, it should be towards the most efficient and least environmentally negative mode, ie shipping. The road and rail users should pay for all their infrastructure costs as shipping does already.”

Eastland Port stated “Coastal shipping competes with other modes that have a history of subsidisation.” IPENZ felt: “It is important that there is consistent treatment of capital allocation between modes to avoid inadvertently favouring one mode.”

Njord and Coast All Services mentioned the situation with rail in terms of inequity. Njord felt: “Road and rail users should pay for their infrastructure costs as shipping does already.” Coast All said: “Make Toll takes ownership and maintenance of the rail. The increased costs placed on rail will force rail rates to rise and assist with forcing cargo to be shipped.”

## **9. Comments on information gathering**

There were 94 comments made in relation to information gathering.

### ***Support***

Most of these comments (57) expressed the view that more information was required in order to inform the industry and enable efficiencies of both operation and policy direction.

The Merchant Service Guild noted: “Access to accurate data is crucial to any government transport initiative, and we strongly support the initiative to rectify this major failing”. Port Nelson stated their support for “planned initiatives with regard to the gathering of more detailed information relating to the coastal shipping freight task”. IPC felt that it is important that the Ministry of Transport “become updated with real information on the effect of shipping on the environment – at the moment too much conjecture abounds.”

Eighteen comments expressed support for a freight demands study being undertaken.

For example, the Northland Regional Council believed: “Such a study would provide a much needed overview of the current modal distribution of import, export and domestic freight movements, including an evaluation for the use of particular modes. This information can be used to facilitate discussions with manufacturer and the shipping industry to gain a clearer

understanding of, among other things, what freight streams are suited to transport by coastal shipping.”

### ***Responsibility and continuity***

There was a suggestion by the Merchant Service Guild that Statistics New Zealand should undertake this type of data keeping and analysis as part of its role as official statistics keeper for New Zealand.

Six comments stated that a regular, comprehensive update of information across the industry is important.

### ***Sources of data***

There were a number of specific suggestions as to how to source and manage data, including updating the Surface Costs and Charges Study 2005. The CEOs of 15 ports stated that they supported “an extension of the 2005 Surface Transport Costs and Charges Study to include domestic sea freight, on the grounds that this will assist policy making”.

Suggested sources of information were shipping and freight companies, ports, freight users, Customs and Land Transport NZ. Suggested sources of data included shipping company waybills, port company records, RUC licensed heavy truck records, freight forwarding business records and records from freighters.

The New Zealand Council of Trade Unions suggested that “more information about the terms and conditions of employment in New Zealand coastal shipping, comparisons with international standards and a profile of the coastal shipping workforce would all be useful”.

In his submission Graeme Bird suggested that the Ministry of Transport “...use sponsorship incentives to universities...to further investigate research data acquisition”.

### ***Reservations***

Two comments expressed reservations about information collection. One of these, Port Taranaki, felt that more gathering of information was not what was required, stating “It is time to act. Further information gathering to support the kick-start (of the industry) is not required and would stultify progress.”

## **10. Comments on workforce development**

Fifty-five comments were made in relation to workforce and workforce development. They related to either (a) recruitment and retention, or (b) training.

### ***Support***

Five comments expressed support for the *Sea Change* proposals and saw them as being sensible.

For example, Business New Zealand noted that: “The average age of the existing workforce is relatively high with over one third over 60 years of age. The industry, in general, is concerned about the need to attract younger, skilled workers into the industry. The proposals outlined in the draft strategy to improve recruitment prospects seem sensible in this respect. Much greater

awareness of opportunities available would likely encourage younger people into the industry.” The New Zealand Shipping Federation expressed a similar view.

The New Zealand Council of Trade unions “welcomed the decision to include workforce initiatives” and suggested that “*Sea Change* needs to explicitly acknowledge the unique nature of maritime transport in relation to competition between New Zealand and foreign workers”. They recommend: “New Zealand industry standards need to be accepted as benchmarks for all employment in coastal shipping and any attempt to exploit a differential in economic development between New Zealand and a foreign crew’s source country must be rejected.”

### ***Need for a comprehensive approach***

However, two comments stated the strategy did not address workforce matters as it should. IPC and Associates felt: “The document goes part way to recognising the need for an action plan (in terms of workforce development). However, reliance on disparate actions will not suffice. There will need to be a high degree of coordination to ensure that the industry is best-served by suitable long-term employees... Maritime New Zealand, the Maritime School, employers, unions and the government will require some coordination to ensure absolute and not piecemeal compliance to an agreed industry employment plan.”

Lewis Rivers believed “The strategy does not address, or seem to provide the avenue for addressing, the major issues of...workforce. Without these issues being fully addressed the domestic sea freight pathway will remain as it is, or will atrophy.”

### ***Training and qualifications***

Three comments indicated an amendment to the sea service requirement for qualifications is needed, with two expressing the view that a clear career path needs to be in place in order to attract and retain professionals in the industry. Five felt that a concerted recruitment drive is needed in order to attract people to the industry.

Six comments supported a review of training across the industry. Specific references were made as to who should be involved in such a review. Those suggested were:

- The Trade Unions
- The MLU
- ITO
- Sector Reference Group
- Training providers
- Government
- Maritime School
- Logistics trainers
- Local ship owners
- Port owners
- Polytechnics and universities
- Overseas ship owners.

### ***Needs of particular groups***

The International Institute of Marine Surveying asked that workforce training did not overlook particular groups, such as theirs, requesting that “...when further considering the needs of support services your advisors do not overlook the often forgotten role of surveyors. They are essential to the maintenance of quality shipping, its safe operation and control of pollution.” And was there

reference to workforce development other than that directly related to shipping, especially the maintenance of shore-based skills.

Tim Frank made a similar comment with regard to stevedores, stating "...there is a great need to train stevedores. Most labourers on the wharf do not have any industry training and get their experience wholly on the job. For best practice, national standards and training courses need to be developed for stevedores."

## **11. Comments on s198 of the Maritime Transport Act 1994**

There were eight comments received in relation to s198, all of which supported its retention. Three submitters called for s198 to be unchanged with a further two calling for it to be not only unchanged but protected.

The New Zealand Shipping Federation called for changes by way of clarification: "Our understanding is that the rules for international shipping carrying coastal cargo in the normal course of discharging or loading there international cargo will not change. In the event of a vessel calling at a port that the ship must pass while sailing on its normal schedule may also carry coastal cargo. The proposed change (to s 198) will not change this, and we want to preserve this option."

The Merchant Service Guild stated: "Guild members unreservedly support cabotage, but in the interests of pragmatism, we submit that the proposed amendments to s198 in order to better reflect its intent (which we acknowledge was not cabotage) are workable. This is on the proviso that the current definition of *coastal cargo* contained within this section remains intact."

Cubic Transport called for "...multi-party support for retention of s198 either in its present form or in a form not further diluted. We are aware of the Greens' opposition to this clause, so it is important that this does not form part of a coalition agreement negotiation."

## **12. Comments on environmental issues**

Thirty comments from all submissions related to environmental issues.

### ***Shipping's positive environmental features***

Ten comments stated that shipping is an environmentally friendly mode of transport that should be promoted and supported. Alex Knowles stated "Coastal shipping is the most fuel efficient way to operate."

The themes were around the environmentally friendliness of the domestic sea freight industry and the need to support this industry and increase its market share. Comments included statements such as:

- "New Zealand's economic and environmental future lies in making appropriate use of the blue highways" (Port Taranaki Ltd), and
- "[We] commend the shift towards more environmentally sustainable transport methods" (Meat Industry Association of New Zealand).

One suggestion was that the shipping industry be rewarded for being environmentally friendly through some type of financial rewards system.

Environment Canterbury stated: “From a national energy usage perspective, there needs to be a re-think of the logic and commercial incentives to encourage (or at least not discourage) long-haul just-in-time freight transport where more efficient rail or coastal shipping alternatives exist. If the high energy requirements of speed are translated into surcharges for customers, or discounts offered for choices of slower modes, then the volumes of freight traffic that are contestable between road, rail and coastal shipping increase.”

### ***Shipping’s environmental problems***

Thirteen comments discussed the negative environmental impacts from both current shipping and ports activity and the potential for increased negative impacts from a larger industry.

In doing so, three comments reflected an understanding of the general benefits of shipping as a relatively environmentally friendly transport mode, but expressed concern over management of shipping in New Zealand waters and ships and their activities at New Zealand ports.

For example, the Waikato Regional Land Transport Committee stated: “Whilst coastal shipping is recognised as a more energy efficient transport mode for freight and produces less CO<sup>2</sup> emissions, it is understood that there are broader environmental impacts which could result. Further environmental assessments would need to be undertaken by government with appropriate guidelines and measures introduced to enable the shipping activity to have minimal impacts on the coastal environment.”

The Wellington City Council voiced its concern that: “Increased sea transport creates increased risk of consequent impacts of pollution (air, noise, water, debris). The proposed strategy must be developed in parallel with measures to manage these risks.”

The Hawkes Bay Regional Council discussed the specific environmental impacts as follows:

“The wider implications of coastal shipping (need to be considered). In particular, impacts resulting from development and growth of ports, which is likely to occur from the increased coastal shipping, which have not been considered in the discussion document. These include:

- (i) Increased need for coastal reclamations and corresponding disturbances of sea beds and coastal ecosystems
- (ii) Discharges of storm water to the coastal environment from port hard areas.
- (iii) Discharges of contaminants to air from waste combustion at ports
- (iv) Noise and reverse sensitivity. This has been a particular issue at the Port of Napier, as increased intensity of operations at the port has resulted in the need for mitigating measures to reduce the impacts of noise in residential areas.”

Six comments were made that these negative impacts were manageable if good planning is in place.

Among these, the New Zealand Shipping Federation stated: “Any increase in emissions from increased coastal shipping services will be offset by a large reduction in road transport emissions resulting from the nodal shift. Further technological improvements to shipping emissions systems and fuels are possible, which will compound this effect.”

Comments were divided in their views as to whether operators or the government should bear the costs of negative environmental impacts from coastal shipping. Cubic Transport submitted that “if road users have to pay for the luxury of JIT<sup>2</sup> distribution, then the financial disincentive coupled with the guilt of acting in an irresponsible way towards the environment will mean a rapid change of behaviour”. The Ports of Auckland suggested the government needs to act to support

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<sup>2</sup> Just in Time

reducing domestic transport emissions, and action which it felt “would have a positive effect on the economy”.

There was some debate on the issue of fuel and fuel efficiency.

The New Zealand Shippers Council believed: “The environment can be protected by ensuring coastal ships are modern and as fuel efficient as New Zealand can afford. Improvements to fuel quality will reduce emissions of SO<sub>x</sub> [sulphur dioxide] and NO<sub>x</sub> [nitrous oxide].”

Njord pointed out, moves to cleaner fuel “come at a very high cost to the vessel operator. For instance, the move from low grade intermediate fuel oil to a cleaner derivative like low sulphur Marine Gas oil would cost a coastal operator running a larger vessel around NZ\$65,000 per week per vessel.”

Newer ships are more fuel efficient and environmentally friendly, but as Lewis Rivers pointed out, new ships come at a cost. He suggested “creation of taxation and capital regimes that will foster the purchase of more modern (if not purpose built) shipping” as a solution.

### ***Coastal shipping issues with Emission Trading Scheme***

The New Zealand Shipping Federation drew attention to potential impacts from the Emission Trading Scheme (ETS) on fuel costs, and suggested that New Zealand coastal shippers be given an exemption in the same way that foreign shipping is exempt. They stated “the introduction of an ETS regime and its likely negative impact on the domestic coastal shipping industry, given the exemption foreign competitors will enjoy, should be noted in the final *Sea Change* document, with either an exemption or a free allocation being recommended by the Sector Reference Group.”

## **13. Other comments**

Other comments were received in three areas.

### ***Container management***

Cubic suggested there should be a “...change maximum container road weight to 30,000 kgs [as] this will encourage use of coastal shipping”.

Cubic commented: “The sea mode could receive a helping hand by tighter control of the activities of the NZ Customs Services and the activities of bureaucratic port employees charged with enforcing Customs’ rules. Presently there is a loose interface between Customs and origin and destination ports. This often results in delays to domestic cargo because of import/export rules being applied overzealously. Same with MAF inspections. All containers are treated as though they are IMEX and this does not aid competition.”

### ***Strategic benefits of coastal shipping in a civil emergency***

James McPetrie thought the strategy “...does not reflect the strategic benefit of a revitalised coastal shipping industry in New Zealand. Whilst working for the Auckland Regional Council as a Civil Defence controller I took part in several exercises which simulated a major earthquake in the Wellington region. The question of support and re-supply was of great importance and it became clear that such an event would have a major impact on the road and rail links and that the only effective way of meeting Wellington’s needs was by sea. It was also apparent that New Zealand lacked the necessary coastal shipping resource to meet this need.”

### ***The need to consider areas of special interest such as the Chatham Islands***

The Hokotehi Moriori Trust urged planners to keep their islands in mind in their strategic planning work: “The Chatham Islands are often overlooked when these initiatives are implemented. Hokotehi would like to signal again that domestic shipping is incredibly important to the Chatham Islands and policy writers are urged to keep this in mind as the Sea Change policy is further developed.”

Further, “Hokotehi would like to be assured that these organisations [the Ministry of Transport and Land Transport New Zealand] are sufficiently aware of the issues affecting society and the economy on the Chatham Islands. The issue here is ensuring that Island issues are on the table when strategies and criteria for future Government funding are considered.”

## Appendix One: Submissions list

Northland Regional Council  
Warwick Walbran  
Cubic Transport Services Ltd  
James McPetrie  
Lewis Rivers  
Alex Knowles  
Kapiti Coast District Council  
Local Government NZ  
Road Transport Forum NZ  
Coast All Services Ltd  
Kaikoura District Council  
IPC and Associates  
Graeme Bird  
Forum for Auckland Sustainable Transport  
Nick Barber  
Hokotehi Moriori Trust  
Shipping NZ  
West Coast Regional Council  
International Institute of Marine Surveying  
Njord Ltd and Cargo Coordinators  
Christchurch City Council  
Tim Frank  
Centreport  
Waikato Regional Land Transport  
Committee  
NZ Shippers Council Ltd  
Quadrant Pacific Ltd  
Federated Farmers  
CEOs of 15 port companies  
Business NZ  
Arthus Amis  
NZ Council of Trade Unions  
Auckland Regional Council  
NZ Chambers of Commerce  
Port of Tauranga  
IPENZ  
Pacifica Shipping  
Eastland Port Ltd  
Ports of Auckland Ltd  
SmartGrowth (Western BOP Sub-region)  
Environment Canterbury  
Auckland Regional Land Transport  
Committee  
Wellington City Council  
Hawkes Bay Regional Council  
Mitsui OSK Lines  
NZ Shipping Federation Ltd  
Venture Taranaki  
Wanganui District Council

Port Taranaki Ltd  
Environment Southland  
South Port  
Toll NZ Consolidated Ltd  
Maersk Line  
Merchant Service Guild IUOW Inc  
Port Nelson Ltd  
Pacific Link Ltd  
Meat Industry Assn NZ Ltd  
Kordia Group Ltd  
Western Bay of Plenty District Council