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Dear Sir

**Maritime New Zealand – Submission on the Strategic Review of the Workplace Health and Safety System**

We wish to commend the HSE Taskforce on the quality of the consultation document. In our view the document provides a comprehensive account of and very useful reference tool in relation to activities in workplaces throughout New Zealand.

Maritime New Zealand is an agency that has been designated responsibilities to administer the Health and Safety in Employment Act in the maritime sector, specifically on board ships and ships as places of work. This arrangement is of particular significance and value as it allows for cohesive and integrated regulatory oversight of the maritime industry. In particular, as Maritime New Zealand registers ships and certifies ship operators and the crew manning those ships, it has the unique ability to form a complete and in depth picture of the operations of ships as workplaces. This places Maritime New Zealand in a very strong position to assess risks posed in those workplaces and intervene as appropriate. The wide spectrum of regulatory tools available to Maritime New Zealand under its constitutive legislation and the Health and Safety in Employment Act, ensures a wide spectrum of intervention tools to maximize beneficial outcomes.

The attached submission emphasizes the areas in which Maritime New Zealand believes improvements can be made to provide a more cohesive framework for regulatory oversight that is informed by risk to avoid unnecessary interventions in workplaces that perform well.

The submission is structured in accordance with the subject headings presented in the submission template for easy reference. The specific questions posed to Maritime New Zealand have been addressed within the submission document and in this letter. In that respect I wish to note that answers to your questions relating to numbers and types of accidents reported to Maritime New Zealand as well as number and characteristics of each category of operators are fully set out in the document *Maritime New Zealand Sectors, Functions and Activities*, a copy of which is attached.

Answers relating to Maritime New Zealand resourcing and its application are reflected in the *Maritime New Zealand Funding Review Consultation Background Document*, a copy of which is also attached.

I trust this responds to all your queries, but please do not hesitate to contact me if you have any further questions or require further clarification.

Yours sincerely

**Stephanie Winson**  
General Manager Legal and Policy