



New Zealand Trailer Boat Federation Inc.

Representing Moored and Trailered Pleasure Craft Clubs

P O Box 58-756 Greenmount Auckland

President: Eddie Metz
Telephone No. (09) 914 0066
Facsimile No. (09) 914 0055

Secretary: Keith Clark
Telephone No. (09) 277 0992
Facsimile No. (09) 277 0910
E-mail: nztbf@clear.net.nz

The Manager
Strategic Development Unit
P.O. Box 4010
HAMILTON EAST

Fax (07) 8560551

Submission to Environment Waikato

On the

Draft Long-Term Council Community Plan 2004 - 2014

Particularly

Navigational Safety Funding

Introduction to New Zealand Trailer Boat Federation Inc.

The New Zealand Trailer Boat Federation Incorporated (NZTBF) represents around 3000 members through affiliated club memberships covering New Zealand. The Federation was formed in 1961 by the Outboard Boating Club of Auckland Inc. specifically for the purpose of rallying against a then threat of recreational boat registration.

Since then the NZTBF has grown into a national organisation representing boat clubs New Zealand-wide and has a mandate to make submissions to local and central Government on legislation that could be detrimental to what is considered fair and reasonable to the practice of recreational boating.

The Federation has representation on Watersafe NZ, Small Boat Safety Committee, Boating Industries Association, Auckland Harbour Users Association, Coast Guard Boating Education and the New Zealand Recreational Fishing Council (NZRFC). Representation has also been established with many other organisations with nautical interests.

The Federation's interest in pleasure boating encompasses *more* than just trailer boats. We are interested in defending the rights of all pleasure boaties, particularly those of powered craft whether they be trailered or moored.

The aims and objectives of the NZTBF are: -

- To promote, foster, advance and protect the interests of pleasure boat owners
- To develop and encourage a high standard of seamanship and safety at sea
- To provide a medium of exchange of boating information, stimulate a greater interest in pleasure boating and develop a fraternal spirit amongst pleasure boat owners
- To foster and improve boating facilities including but not limited to ramp and marine radio communications within New Zealand
- To co-ordinate the efforts of affiliated clubs in line with these objectives

NZTBF Comments on the Draft Long-Term Council Community Plan 2004 – 2014.

Representatives of the NZTBF have studied the section of the Draft Long-Term Council Community Plan titled "Navigation Safety" and have the following comments: -

Short timeframe given for public feedback

Unfortunately we must start out on a negative note by criticising Environment Waikato for giving the public such a very short time period to read, digest and prepare intelligent submissions in time for the May 14th deadline.

While we realise that submitters who are serious in their comments on the draft plan *will find a way of meeting the deadline regardless*, we are very aware from our own experiences that the apathetic nature of the average New Zealander will have led to Environment Waikato receiving only a relative handful of submissions to what it might have otherwise received had the submission time-frame been say twice as long.

Additionally, the quality of the feedback may have been compromised as club and group officials scrambled to canvas and ascertain their groups' opinions on the various sections that may have concerned or delighted them.

Fortunately for the clubs affiliated to the NZTBF this was not the case. The NZTBF has for its entire 43-year existence had a strong opinion *against boat registration* such as that raised in the section 'Emerging Issue' (page 97) of this draft plan.

Similar Objectives

We are pleased to see that many of the safety goals outlined in this section are similar to the safety goals that the Federation has been successfully advocating for years.

NZTBF affiliated clubs have extensive lists of compulsory safety items that must be carried on the boats at all times while on the water. Most clubs have boat inspections which in many cases are repeated on a 12 monthly basis or on a spot-check basis. Most clubs encourage boatie education and many either hold courses themselves or co-ordinate their education activities with their local Coastguard and other marine education providers.

Specific Rebuttal of Page 97 'Emerging Issue'

\$971,000 budget for navigational safety work

The draft plan doesn't actually detail the items that make up the \$971,000 or the future est. \$1M/year. It does say that 70% of the beneficiaries of the budget are "boat owners, swimmers, kayakers, fishers and water skiers etc."

It would make interesting reading to see where the money actually goes and if the real figure is different to 70%.

Entire Cost of this work paid by Regional ratepayers through the Generate rate. Environment Waikato have stated that they are interested in making sure the way of paying for this work is as fair as possible.

We would like to point out that for years right across the country as well as locally within Environment Waikato there are services made available to the regional and/or district ratepayer but which are only used by a relatively small amount of people. The navigational safety services for which Environment Waikato wants to single out is just one of these. Other examples where there is no specific user - tax include: -

- Coastal walkways, regional parks and reserves
- Beach and sand dune preservation measures
- Public libraries
- Public toilets
- Public playgrounds
- Council provided facilities for disabled persons eg. Dedicated carparks and wheelchair ramps in public buildings and recreational areas etc.

Our point here is that there is significant precedent for the general ratepayers to contribute toward public services that they may seldom or never participate in, and that it is generally accepted by ratepayers that this is a reasonable and fair system.

Why should beneficiaries of the Environment Waikato Navigation safety services be any different?

If Environment Waikato brings in recreational boat registration as a means of funding the council support for their activities, will Environment Waikato also be installing turn styles on the entry gates to coastal walkways or public playgrounds or perhaps pre-paid tokens on public toilet doors?

Silly as it sounds, this is the sad parallel to singling out recreational boaties to pay for the services that only 30% of the rest of the ratepayers enjoy.

Currently recreational boaties are helping pay for a minority of the regional population who chose to use the coastal walkways instead of going boating. It could be said then that the effect of this is that non-coastal walkway user ratepayers have carried an unfair share of the costs of maintaining the walkways.

What percentage of people actually use the regional council maintained coastal walkways? More than 30%?

Environment Waikato's review found 70% of the beneficiaries of the Nav and Safety budget were "boat owners, swimmers, kayakers, fishers and water skiers".

Since boat registration would only be likely to be placed on the recreational boat owner, will the boat-owners carry the unfair cost share of the swimmers, kayakers and fishers (ie. Non-boat-owner members of the 70% group)?

If boats were to be registered to raise funds for Nav and Safety, perhaps all swimmers and surfers should also pay a fee which covers the costs of providing surf life saving facilities, after all according Water Safety New Zealand's Drowning Statistics for April'04 the activity which suffers from the most drownings per recreational activity category, has been swimming (10 this year out of 31 in all other recreational categories).

Swimmers have been the clear majority of all recreational water user drownings over the last 19 years at least.

Should they be taxed before all recreational boat owners since the loss of life in that category is consistently the highest?

The truth of the matter is that the regional current rates system is a de-facto means tested tax system used by local bodies (more expensive house = more ability to pay = higher rates) and this money is spread to cover the cost of *all* specialist groups in the community. Local authorities bring up the "user pays" argument when it suits them.

Is this proposed tax just a scam to target a group of people who are seen to be 'wealthy' / 'privileged', and who might expect little support from the bulk of the community if they complain. I imagine the public reaction by comparison if local bodies made all park users pay \$2.00 a head at a pay and display stand to cover park maintenance costs. It could be easily introduced, but there's no chance *that would ever happen.*

Commercial port charges and suggested funding methods such as boat ramp fees, insurance company involvement and recovery of costs from petrol tax.

Though the Waikato region does not have major commercial shipping to help fund the navigational safety aids as such regions as Northland, Auckland and Bay of Plenty, the Waikato region does not have the same need for such expenditure either.

If convinced that boat ramp fees were to be solely directed at the maintenance and improvement as well as replacement and installation of new boat ramps, the boat ramp user (which includes kayakers and jet skiers) would more than likely support the idea of a modest launching fee. However convincing users that this would be the case might be a big task as ratepayers and taxpayers have been lied to before. This same problem faces Environment Waikato if boat registration is claimed to be benefiting only registered users of the navigational and safety spend.

As you have implied, convincing insurance companies to get involved in helping with education or Nav and Safety funding seems logical since the more education and more navigational safety there is, the less likely it will be that they have to cover the costs of accidents. It's not likely that they will see the logic as clearly.

Petrol Tax. There have been all sorts of figures bandied about regarding the portion of the cost of a litre of petrol that goes to the government by means of 'Petrol Tax'.

In 2000 at least, the Automobile Association stated that for every litre of petrol purchased, motorists pay taxes, duties and levies totalling 39.485 cents (excluding GST) broken down as follows: -

- o 17.8 cents - National Land Transport Fund
- o 18.7 cents - General Crown Account
- o 2.3 cents - ACC's Motor Vehicle Account
- o 0.66 cents - Local Authority Petroleum Tax
- o 0.025 cents - Petroleum Fuels Monitoring Tax

Outboards being what they are are generally inefficient and use quite a bit of petrol. As a rough rule an outboard uses somewhere between 1/6th & 1/4 of a litre per horsepower per hour of petrol. So a 90hp motor doing 'average running' may expect to consume between 15 - 22 l/hr, That's between \$5-92 and \$8-68 per hour in petrol tax excluding gst!

The recreational boat owners buying petrol have been denied the ability to recover this petrol tax content and the government continues to use it elsewhere according to AA.

When a boat owner tows their boat to and from the ramps, the fuel consumption of the tow vehicle skyrockets, going a long way (if not over compensating) for the additional loading that the boat & trailer may have on the road. So lets not hear that argument used against petrol tax recovery.

We strongly encourage Environment Waikato to approach Central Government to tap into that money that the Waikato boat petrol buyers have contributed towards, and apply at least some of it to the Environment Waikato Navigational and Safety budget.

Assigning a unique number to all recreational boats

There is no argument that, like motor vehicle registration, placing a big number on the sides and transom of a boat: -

- o would help identify the boat owner for enforcement ,
- o would allow a contact register of regional recreational boaties,
- o would possibly make the skipper of such a vessel more conscience of being an idiot on the water
- o would give those bodies who were interested and adequately funded thousands of addresses to send educational material to
- o would provide an (un-ending) source of revenue

However, just drive on New Zealand roads for even a short while and observe just how dangerous New Zealand drivers can be even though their chances of being held accountable due to MV registration are very high.

They are part of the most widely used vehicle registration system known to mankind, which incidentally has many of the same characteristics of the recreational boat registration system muted by Environment Waikato.

One point to consider regarding the bringing to justice of irresponsible skippers is that as with the dangerous car drivers above, this requires evidence and witnesses who can be bothered taking a complaint to full completion.

As with dealing with lack of courtesy on NZ roads, many boaties will no doubt brush off the misbehaviour of other boaties as an inevitable occasional nuisance rather than gather the requisite evidence or willing witnesses to carry through a complaint. Hurlled abuse has usually sufficed till now in all but the most serious few cases.

Bodies responsible for the enforcement of the boating rules and bylaws would naturally favour any move that would make their jobs easier.

Better Education

We hold a belief supported by the MSA as well other equivalent authorities overseas that *Education* is the key to safer boating.

According to the Pleasure Boat Safety Advisory Group report 1999, the leading casual factor in 79% of fatal accidents was the carrying of inadequate safety equipment and weather/sea conditions. It follows that if recreational boaties had better boating knowledge including knowing what safety equipment to carry, how to use it and when not to be on the water at all, then there would be safer boating behaviour, less accidents and generally less need to spend money enforcing the rules and bylaws.

Other Points

1. Does Environment Waikato have any statutory authority to license boats? Only parliament has the jurisdiction to amend the Transport Act, which in turn allows local and regional councils to pass bylaws. The Transport Act was amended several years ago and went through a select committee process in order to allow the licensing of personal watercraft i.e. PWC.
2. According to the Pleasure Boat Advisory Group studies, of the countries that have boat registration, few believe that registration actually does much for safety and that there was no real evidence the registration alone improved compliance. However it was good for raising money.
3. Our fatality rates are much the same as Australian and US states which have regulations. As for practicality, most accidents happen in vessels under 4m long; kayaks, jet skis, wind-surfers and - far and away the biggest problem - tin dinghies, which *would most likely be exempt from boat registration anyway*.
4. We strongly support the concept of volunteer launch wardens who dish out free advice, educational material and give the odd growling to ignorant skippers. This is good method of getting the message across though these wardens need to be quite thick skinned at times.
5. If registration becomes compulsory, people may tend to skimp on the safety gear because they would believe that they are spending enough on boating and taxes.
6. Waikato based boaties, boating outside the Environment Waikato area would not need to be registered which would seem unfair to outsiders wishing to boat within the region. Many recreational boaties from outside the region might then avoid coming to holiday in the region because of the requirement for their boats to be registered for the short period of their visit. This would result in a considerable loss in spending in the region, something that would be felt in businesses from Motels, supermarkets to petrol stations.
7. The claim that boat registration/identification might help in cases of boat theft is a nonsense. If car thieves go to the extent of welding replacement identification plates to the fire walls of stolen cars, a boat thief would go to the simple trouble of rubbing off a registration sticker with a rag dipped in petrol.

In conclusion, the New Zealand Trailer Boat Federation strongly oppose the introduction of boat registration into the Environment Waikato region or any other region in New Zealand for the basis of fund raising to meet regional Navigational and Safety funding requirements.

If Environment Waikato seek the "most fair system" of paying for the Nav Safety services, they need to continue to rate as they do now and steer clear of the concept of raising revenue from the boaties alone.

Please keep the NZTBF informed of any developments and on any mailing lists you may have on this topic.

We wish to be given the opportunity to make verbal submissions on behalf of the NZTBF member clubs, should the occasion arise.

For the New Zealand Trailer Boat Federation

Eddie Metz
President