

Full Name: Rodney Bryan Russ
Organisation: N/A
Full Address: 38A Thorrington Road, Cashmere, Christchurch 8022
Telephone Number: +64 21 684055
Email Address: Rodney@Strannikoceanvoyages.com
I would like my address for service to be my email: Yes.

Person of interest declaration: Not sure what this means or its relevance.

Do you wish to be heard in support of your further Submission: Yes

Dated. 8/12/25

Further Submission:

Access and Anchoring New Rule 47A Ref 1.2 (e)

Anchoring Feasibility not adequately Addressed.

Formal Submission

In my original submission, I examined the technical considerations involved in anchoring at both the Inner and Outer Anchorages within Perseverance Harbour. That analysis was based on a scope of 4:1 (i.e., anchor chain length equal to four times the depth of water). Using that scope, the calculations demonstrated that it is practically impossible for a vessel exceeding 125 metres in length to anchor within the Inner Harbour Anchorage while maintaining adequate swing room and remaining within the designated anchorage limits. Although, the Outer Anchorage offers a larger area, it also has significantly greater water depth. Additional factors relevant to the Outer Anchorage include its exposure to more severe weather and sea conditions, as well as its increased distance from the landing site.

Since submitting that analysis, I have agonised over this question because it concerns me. I believe anchoring poses one of the greatest risks. In hindsight I consider the original scope of 4:1 to have been insufficiently rigorous, and instead suggest a scope of 7:1, particularly given the notoriously poor holding characteristics at Campbell Island and the unpredictable, often severe, weather conditions experienced in the region. The ICAS (International Association of Classification Societies) recommends 6 -10 scope when anchoring

Revised calculations using a 7:1 scope show the following:

A. Inner Harbour Anchorage

The Inner Harbour Anchorage has a water depth of approximately 28 metres. A 7:1 scope would therefore require 196 metres of anchor chain. Given the physical confines of the

anchorage —further reduced by the mandatory 300-metre buffer zone—it would be impossible for any vessel exceeding 125 metres in length to anchor legally while maintaining the necessary swing room.

B. Outer Harbour Anchorage

The Outer Harbour Anchorage has a depth of approximately 41 metres. Applying a 7:1 scope would require 287 metres of anchor chain.¹ While it is technically possible for a vessel to anchor in this location, there would be no margins (none whatsoever) for error or weather. In addition as outlined in my original submission, this anchorage is approximately 2 nautical miles from the landing site and is significantly more exposed to adverse weather and sea conditions, which in this region change frequently and unpredictably.

Conclusion

The revised calculations based on 7:1 scope only highlights the limitations and risks associated with the anchorage options. I respectfully request that these updated calculations be taken into full consideration as part of your deliberations.

Notes:

1. It is impossible to know exactly how much anchor chain individual ships have. Based in Industry standards it is probably about 300 metres on each of the Port and Starboard Anchors. Obviously the deeper the water the more chain is required. I would suggest that in 41 metres of water and a scope of 7:1 a vessel is near its maximum anchoring depth.