

Re: Proposed Rule Change – Rule 47A: Access and Anchoring for Vessels Over 125m in Perseverance Harbour, Campbell Island

1. Summary of My Submission

I **oppose the proposed Rule 47A**, which would change the current prohibition on vessels over 125 metres accessing and anchoring within Perseverance Harbour, Campbell Island, to a discretionary activity. I believe the current rule—established through extensive consultation, expert input, and guided by a clear **precautionary approach**, only 9 years ago—remains appropriate and necessary. Contrary to what the authors claim there have been no significant changes in the industry that would suggest a need for change to this rule.

2. Grounds for My Opposition

a) Inadequate Justification and Lack of Precaution

The current rule was the result of **significant research, negotiation, and consensus** among experts and stakeholders with deep, long-standing experience in the Subantarctic region. It was—and remains—based on the need for a **precautionary approach** to environmental and navigational risk and anchoring management.

The Section 32 Report fails to address critical aspects of this issue, particularly:

- The **serious navigational and anchoring challenges** of vessels over 125m in Perseverance Harbour.
- The **lack of evidence** for supposed technological advancements in large vessel manoeuvrability.
- The **absence of specific, technical data** on anchoring feasibility, holding ground, weather systems, and consideration of historical incidents.

b) Flawed Assumptions Around Vessel Design and Operation

The proposal generalises the entire cruise ship market and fails to recognise key distinctions between **expedition cruise vessels** and the larger cruise ships:

- **Expedition vessels are smaller** (typically under 125m) with limited passenger numbers, tailored for remote, sensitive environments.
- Recent expedition ships (e.g. post-2017 builds) are around 110 m in length, carrying ~130 passengers. Contrary to that the authors claim/suggestion (*visits from smaller eco-tourism operators seems to be in decline*) there appears to be a growing demand in the market for the **smaller expedition vessels**, because they are known to provide

a more intimate and meaningful wilderness and wildlife experience for example Virtuoso Travel's 2026 Report signals the rise of smaller, slower, and more sustainable travel.

- The claim that expedition shipbuilding is "trending larger" lacks supporting data or clarification of what constitutes improved "manoeuvring capabilities." In my experience, there have been **no significant technological advancements** since 2017 that justify relaxing current access rules.

c) Campbell Island's Extreme Remoteness and Limited Emergency Support

Campbell Island sits at **52° South**, in the **Furious Fifties**, with the nearest port (Bluff) over **360 nautical miles away**—approximately 36 hours steaming in good conditions. Emergency response capability in this region is **severely limited**:

- NZ currently has **no suitable off-shore salvage tug** capable of reaching the island at short notice. The closest one is possibly in Australia depending on its availability.
- In the event of an oil spill, grounding, or need for medical evacuation, **response times would be dangerously slow**, with limited support capacity—possibly only from the navy and that depends on what vessels are where.
- This reality **demand a precautionary approach** to any increased vessel access.

d) Historical Incidents Prove Anchorage Is Unsafe

There is a **long record of anchoring incidents** in Perseverance Harbour:

- In 1840, Sir James Clark Ross's *Terror* dragged anchor and grounded on what is now known as Terror Shoal.
- A near-disaster involving a NZ Navy vessel (often referred to as the "8 Minutes from Court Martial" incident) occurred due to anchor dragging.
- I have personally visited the island over **100 times** aboard **8 different vessels** (21m–124m in length), and can confirm **anchor dragging on at least 6 of these on various occasions**.

This anchorage is known to be unsuitable and unreliable due to:

- **Volcanic, glacially carved bottom topography**, consisting of rock and poor holding ground.
- **Highly variable and extreme weather**, which can shift rapidly without warning.
- **Surrounding terrain** (e.g. Mt Lyall, Mt Honey) that funnels and amplifies wind and swell, creating unpredictable and dangerous conditions.

e) Anchoring Feasibility is Not Adequately Addressed

A technical analysis based on real-world experience reveals:

- **Inner Anchorage:** Anchoring Depth of ~28m would require at least 100m of chain at a 4:1 scope. With vessels over 125m and 300m shore buffer, there is virtually **no safety margin**. (laying out more Anchor chain only decreases the Safety Margin)

- **Outer Anchorage:** Anchoring Depths of ~41m would require ~164m of chain at 4:1 Scope. With vessels over 125 metres there is more of a safety margin but this anchorage is significantly **more exposed to the wind and sea** (wind speed and wave height/frequency could be double that of the inner anchorage) and compounding this is the fact that the potential anchoring site is nearly **2 miles from the landing site**.

In either case, anchoring is precarious. If a vessel begins to drag, options are limited and recovery complicated—especially if crew are also recovering passengers in zodiacs, a situation reminiscent of the **Snares Island incident**.

f) Lack of Pilotage, and No Capacity for Oversight

If this anchorage were located anywhere else in New Zealand, it would almost certainly require **compulsory pilotage**. However, this is not practical at Campbell Island. Therefore, regulation must fall back on **risk minimisation**, not risk management.

- This is only possible by **retaining clear, firm restrictions**—not weakening them through discretionary frameworks.
- Professional guidance from Environment Canterbury (ECan) in the Section 32 Report only includes **navigation and manoeuvring**, not anchoring—a **critical oversight**.

The ECan report concludes there is no indication that Rule 47 (prohibiting vessels longer than 125m closer than 600 metres) is not appropriate.

The terms “may be acceptable” and “could be appropriate” do not reflect a **precautionary approach** or confidence in environmental protection.

g) Commercial Motivations Behind the Rule Change

The impetus for this rule change appears **to be commercial**, intended to benefit just **two of the six** current concessionaires—who, I understand, **chose not to engage** in the 2017 CMS development process despite being invited.

- The recent increase in landing fees to **\$1,188 + GST per person** (up from \$405+gst pp) further supports the claim of **commercial motivations** behind pushing for larger vessel access. It is also consistent with current governments goal to deregulate and a push for government agencies to increase revenue.
- Cruise ship visits to NZ are in **significant decline**—down 40–42% for 2025/26, and projected to fall further. These two companies are **international operators**, and their long-term commitment to NZ waters is uncertain.
- If they withdraw, the other concessionaires (with vessels under 125m) will quickly absorb unused permits, ensuring no **financial loss to NZ** or DoC. The grounding of one of these larger vessels would incur a huge financial and environmental loss to NZ.
- Entry to Carnley Harbour at the Auckland Islands is prohibited by the same Rule 47 but the Department “after considering its morphology, water depths and lack of landing sites for large cruise ships” aren’t seeking to change this, implying that they

had safety concerns. To compare; Campbell Island as we have noted in this submission is a flooded glacial cut valley 4nm long x 1500m wide whereas Carnley harbour is a flooded Caldera of an extinct volcano measuring some 12nm x 6.5nm. The Eastern Entrance to Carnley Harbour is 1100 metres wide whereas Campbell Island is only 700 metres. There are also 3 excellent sheltered anchorages in Carnley Harbour all with anchoring depths of ca25 metres compared with 28 and 40 metres for the two anchorages at Campbell. There are 5 landing sites within Carnley Harbour, none are suitable or are of interest for the large cruise ships that DoC now want to allow into Campbell Island. Again the emphasis is on revenue generating, not on environmental safety and a precautionary approach to risk management.

3. Relief Sought from the Minister of Conservation

I respectfully request the Minister to:

- **Delete proposed Rule 47A** in its entirety.
- Maintain the current prohibition on vessels over 125m entering Perseverance Harbour, as originally adopted in the Coastal Plan following **extensive expert consultation and consensus**.
- Uphold the **precautionary principle** that has underpinned Subantarctic Island management policy since inception.
- Recognise that the anchorage at Perseverance Harbour has **long been known as unsafe** and this fact has **not been addressed** in the new proposal.
- Reaffirm that any changes to rules for access in the Subantarctic should be based on **environmental safety, not commercial interests**, and only after thorough, independent, and evidence-based analysis involving **those with proven field experience**.

Closing Statement

With over 100 visits to Campbell Island aboard a range of vessels, and decades of firsthand experience navigating its waters, I speak from **extensive personal and professional knowledge**. This proposal demonstrates a **dangerous underestimation of risk**, and a worrying shift away from the values and principles that have protected New Zealand's Subantarctic Islands to date.

The current rule exists **for good reason**. It should be preserved, not weakened.

Submission on Proposed Plan Change: Rule 40C – Ancillary Craft Distance Restrictions

1. Provisions of the Proposed Plan Change my submission relates to:

Rule 40C

"Ancillary craft must not be in a position:

- (a) more than 0.54 nautical miles (1000m) from where the mother ship is authorised to access in accordance with the Plan without reliance on Rule 1; and/or
- (b) more than 3000m from the mother ship, at any time."

2. My Submission: I Strongly Oppose the Inclusion of Rule 40C in the Proposed Plan Change

a. Mischaracterisation of Ancillary Craft

The proposed plan change appears to trivialise the use of ancillary craft by referring to them as "inflatable dinghies." This is either a result of a lack of technical knowledge or an attempt to downplay their significance in expedition travel operations. The most commonly used ancillary craft in expedition tourism are **Zodiac Milpro Mark 5** vessels used by military, law enforcement, and search and rescue agencies worldwide. These are not recreational or leisure vessels, but purpose-built for safe operations in some of the remotest and challenging maritime environments in the world.

Any regulation based on a misunderstanding of the nature of these vessels is fundamentally flawed.

b. The Role of the Ship's Captain and Operational Oversight

Ancillary craft are considered part of a ship's equipment, essential for Expedition Travel. Their deployment, management, and safety are under the direct responsibility of the ship's Captain, supported by his officers and senior expedition staff. Captains are certified to the highest international maritime standards, and make decisions based on training, risk assessment, and operational protocols. Senior Expedition staff bring local knowledge and experience which the Captain may lack in some locations.

To impose arbitrary distance restrictions from the mother ship overrides professional maritime judgement and disregards decades of safe, incident-free operations. No bureaucratic rule can substitute for the expertise, accountability, and safety responsibility of a vessel's Master and senior expedition staff.

c. Safety Record and Incident History

Since tourism began in the NZ Subantarctic Islands in the 1970s, I estimate there have been in excess of **20,000+ ancillary craft deployments**. There has **never** been a single life-threatening incident or significant fuel spill from these vessels.

This exemplary track record reflects the robustness of both the vessels and the operational systems in place.

d. Fuel Spill Concerns Are Unfounded

Zodiac vessels are powered by **outboard (petrol) engines**, with their fuel stored in 2 x 25L tote tanks made of highly durable, approved materials. These containers are used globally under rigorous maritime regulations and pose **an extremely low environmental risk**.

The worst-case scenario—minor leakage from a cap or breather—is less than negligible. This does not justify introducing a rule that could cripple safe, controlled operations. Ironically, the risk posed by a large 125m+ vessel navigating into sensitive areas such as **Perseverance Harbour** far exceeds that of small, agile, low-impact Zodiacs.

e. Emergency Response Capabilities

The claim that an accident or incident with an ancillary craft may necessitate the mother ship going to its rescue and thereby place the vessel at risk is factually incorrect. Modern expedition vessels are all equipped with **Fast Rescue Boats (FRBs)** and crews trained in rapid, safe deployment. These are internationally mandated for SOLAS-compliant ships and form part of routine safety drills and certification.

There is no scenario in which a mothership would be unreasonably endangered by supporting ancillary craft operations.

f. Unintended Penalisation of Remote Site Access

This rule would **inadvertently deny access** to several key “small” expedition sites, which some of the existing concessionaires currently have access to (and have done for many many years) and are considered critical to their interpretation and conservation programs. This rule will significantly penalise/disadvantage four of the six existing concessionaries who do and can use these sites, These include:

Auckland Islands:

- Southwest Cape

Campbell Island:

- Camp Cove
- Venus Cove
- Garden Cove (providing access to Mt Honey)
- Zodiac cruising to Davis Point from Beaman Cove.

Ironically, these sites are among the most sheltered in the Subantarctic region, while the more exposed open-sea zodiac operations at the Snares, Antipodes, and Bounty Islands remain unaffected due to mother ships being able to drift nearby.

g. Applicability to the Kermadec Islands

The same rationale and concerns apply directly to the Kermadec Islands, where similar operational and environmental conditions exist. Applying blanket rules without consideration of location-specific factors undermines the flexibility and safety of expedition operations.

3. Relief Sought

I respectfully request that:

Rule 40C be removed from the proposed Plan Change in its entirety.

There is no evidence—historical, environmental, or operational—that supports the need for this new restriction. Existing regulations and professional oversight are already functioning effectively and safely. Introducing this rule:

- Undermines the authority and responsibility of trained maritime professionals;
- Introduces unnecessary barriers to responsible, low-impact tourism;
- Jeopardises the viability of accessing several small but ecologically and culturally important landing sites;
- Misrepresents the actual risk posed by ancillary craft, which is extremely low.

Expedition tourism is a critical platform for public education, conservation awareness, and the long-term sustainability of protected regions. To curtail this without sound justification would be a significant setback.

4. Conclusion

The proposal as written reflects a lack of practical understanding of expedition operations and ignores an impeccable safety and environmental record. The current framework is working well and does not require amendment.

For the sake of sound environmental stewardship and practical conservation outcomes, I urge the Minister to reject Rule 40C and retain the existing provisions governing ancillary craft.

Suggested Alternative Approach to Ancillary Craft Operations in the Subantarctic and Kermadec Islands

I respectfully suggest the following proposal as an alternative to the suggested changes to the Coastal Management Plan regarding ancillary craft operations in the Subantarctic and Kermadec Islands.

It is my understanding that all concessionaires are currently required to have a professionally audited and approved safety plan in place prior to a concession being granted. In the case of operations around the Subantarctic and Kermadec Islands, I have always assumed that these plans included the use of their ancillary craft.

If, however, ancillary craft operations were excluded from the original safety plan requirements due to the fact that many of these plans would have been implemented before the Coastal Management Plan was approved, then I believe there is now a clear opportunity—and necessity—to address this gap.

Now that the Coastal Management Plan is in force, I propose the following:

- **All Subantarctic and Kermadec concessionaires should be required to prepare a dedicated operational safety plan specifically covering the use of their ancillary craft.** This should be developed in consultation with their Captains, senior officers and senior expedition staff taking into account the environmental and weather conditions in these regions.
- This plan should be **subject to audit and approval by the incumbent Harbourmaster responsible for the Subantarctic Islands**, or a delegated, approved and appropriately qualified maritime authority.

This approach would achieve several important outcomes:

1. **It would close a regulatory gap** that appears to have led to the current uncertainty and inconsistency surrounding ancillary craft use.
2. **It would ensure a fair and consistent regulatory environment** for all concessionaires, removing any unintended preferential treatment or undue penalisation arising from the proposed plan changes.
3. **It places responsibility where it properly belongs**—with the Captains who have the appropriate expertise, accountability, and on-the-ground experience to manage these operations safely and responsibly.

In my view, this proposal offers a more balanced and practical alternative that enhances both safety and environmental protection, without unnecessarily limiting access or undermining the professionalism and experience of the existing operators.

FOR OFFICE USE ONLY

Date received:

Submitter ID:

Submission Form (Form 5)

Submission on Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

[Form 5](#) Submissions on a Publicly Notified Proposed Regional Coastal Plan under Clause 6 of Schedule 1 of the Resource Management Act 1991.

Return your signed submission by 5pm 22 October 2025 via:

Email: planchange1@doc.govt.nz with subject line: Proposed Plan Change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands

Post: Department of Conservation, Private Bag 3072, Hamilton 3240
Attention: Jesse Gooding, RSP Resource Management Team

All sections of this form need to be completed for your submission to be accepted. Your submission will be checked for completeness, and you may be contacted to fill in any missing information.

Full name: Rodney Bryan Russ

Phone: [REDACTED]

Organisation:

Private Individual

(*the organisation that this submission is made on behalf of)

Email:

rodney@strannik-oceanvoyages.com

Postal address:

[REDACTED]

Postcode: [REDACTED]

Address for service: name, email and postal address (if different from above):

As above

Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.



Department of
Conservation
Te Papa Atawhai

Te Kāwanatanga
o Aotearoa
New Zealand Government

Please tick the sentence that applies to you:



I could not gain an advantage in trade competition through this submission; or



I **could** gain an advantage in trade competition through this submission.

If you have ticked this box please select one of the following:



I am directly affected by an effect of the subject matter of the submission



I **am not** directly affected by an effect of the subject matter of the submission

Hearing Submissions [select appropriate box]:



I wish to be heard in support of my submission.

☐ I do not wish to be heard in support of my submission.

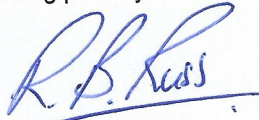
☐ If others make a similar submission, I will consider presenting a joint case with them at a hearing.

☒ If others make a similar submission, I will not consider presenting a joint case with them at a hearing.

- *In accordance with clause 7 of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under clause 8A of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).*
- *Section 352 of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.*

☐ I would like my address for service to be my email.

☒ I have selected email as my address for service, and I would also like my postal address withheld from being publicly available.

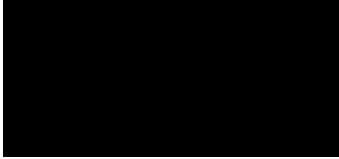


Signature:

Date: 11/10/25

(Signature of person making submission or person authorised to sign on behalf of person making the submission – unless you are providing your submission by email).

Rodney Russ



October 11th 2025.

Department of Conservation

Private Bag 3072

Hamilton 3240

Attention: Jesse Gooding, RSP Resource Management Team

Email: planchange1@doc.govt.nz

Proposed Plan change 1: Regional Coastal Plan: Kermadec and Subantarctic Islands Coastal Management Plan

I write to submit my formal response to the proposed changes to the Kermadec and Subantarctic Islands Coastal Management Plan.

My name is Rodney Russ, I am a recreational and former professional user of these regions for over 53 years. My association with both the Subantarctic and Kermadec Islands has been long-standing, hands-on, and deeply personal.

In the 1970s, I served as a Fauna Conservation Officer with the New Zealand Wildlife Service and was involved in several major scientific expeditions to the Auckland and Campbell Islands. From the late 1980s until 2019, I visited the Subantarctic Islands regularly as the owner and senior expedition leader of Heritage Expeditions Ltd., during which I also led several expeditions to the Kermadec Islands.

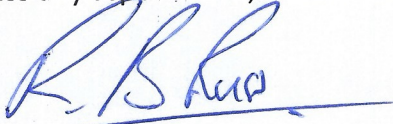
Although I no longer have any commercial or financial interest in Heritage Expeditions, my involvement in these regions has only deepened. In recent years, I have sponsored two private scientific expeditions to the Auckland Islands—one focused on Southern Right Whales and another botanical survey—both conducted aboard my personal 24-metre expedition yacht, *MV Strannik*.

To date, I have undertaken over 100 expeditions to these Islands aboard vessels ranging in length from 21 to 123 metres. In my career I have sailed over 1.2 million nautical miles, largely in high-latitude waters. I hold the following maritime qualifications:

- RYA Ocean Yachtmaster (commercially endorsed – UK)
- Master 24m (Australia)
- Skipper Coastal/Offshore (New Zealand)

Importantly, I was closely involved in the discussions and negotiations around the 2017 Coastal Management Plan, and bring both historical and practical knowledge of the challenges and opportunities in conserving these unique ecosystems.

Please find my detailed submission attached. I would welcome the opportunity to further discuss any aspects of it, should that be helpful.

A handwritten signature in blue ink, appearing to read 'R. Russ', with a horizontal line extending from the end of the signature.

~~Yours sincerely,~~

Rodney Russ