

## **Submission in respect of the Navigation Safety Bylaw – review of clause 2.17 and schedule 7.1.5 under Local Government Act 2202**

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**I do not wish to be heard in respect of my submission**

**Occupation:** Business Analyst **Date:** 13 February 2009

**This submission relates to Clause 2.17 Visibility of kayaks and paddle craft.**

Based on the history of collisions with paddle craft in New Zealand, Clause 2.17 will make no difference to safety on the water. It is unsupported by facts, which is both unprofessional and inexcusable.

Every skipper has a fundamental responsibility to maintain an adequate lookout, and it appears from the history that failure to maintain an adequate lookout or inadequate boat control has led to most of the incidents in the past 4 years.

There have been no collisions at night, so why try to impose obligations over and above those laid out in the International Regulations for Preventing Collision at Sea? Sea kayakers at night are clearly obliged to carry a torch, and use it if there is a danger of a collision, which would be far more effective than a fixed, white light, and wouldn't destroy their night sight, or that of their companions.

It is clear that education of boat owners is the key to accident prevention, rather than heavy-handed, poorly thought through rules.

I ask that you remove Clause 2.17 from the ARC Navigation Safety Bylaw and work to ensure that all skippers and vessel operators understand and properly fulfil their obligations while out on the water.