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23 November 2024

Licensing of Jet Ski/water scooter Commercial Operators

Dear Licensing Committee,

Thank you for consulting on your consideration of commercial Jet Ski Licensing. The matter has been considered by the Committee of the River Deben Association. I have aligned the RDA Committee's response to your consultation's set of questions:

NB Jet Ski taken to mean jet ski, water scooter and similar "personal water craft" (PWC) craft

1. Whether the Council should licence Jet Skis?

The licensing of jet skis **should be supported – but only with conditions**, see below.

2. What conditions if any should be imposed?

- a) **Conform** to the existing River Deben byelaws ([link](#)), in particular the speed limits. These byelaws apply only to pleasure craft (and with specified dates for the speed limits). As a condition, these byelaws should be taken to apply to jet skis for commercial hire and the speed limits all year round.
- b) **Avoid** wildlife sensitive areas (see zoning proposal below)
- c) **Safe operation** and maintained appropriately
- d) **A RYA PWC Level 2 qualified instructor to be present** (on, or on an accompanying Jetski or RIB) throughout the trip - who would be responsible for hirers' adherence to the River Deben byelaws and ESC Licence conditions
- e) **Hirers must be aged 18 or over** to drive a Jet Ski by themselves (and accompanied by an instructor on another craft). Anyone over the age of 12 can ride as a passenger.

3. What minimum specification should be required?

- a) Jet skis (like all other PWC) must be operated safely and maintained appropriately
- b) Jet skis should be capable of carrying two adults (enabling a qualified instructor to be present,) and be of the modern, quieter type to reduce disturbance due to noise

4. Should zones of operations be imposed?

YES. The RDA has produced a guide ([link](#) and see over) initially intended for where kayaks should/should not operate and this could be developed by ESC to form a basis for where commercial jet skis should/should not operate.

RDA Guide 'Protecting wildlife when canoeing, kayaking and paddleboarding on the Deben'
Guide Introduction

"We are very fortunate that the river Deben is designated as being of international importance for wintering birds and has national protection for both breeding and wintering birds. We have bred geese, redshanks, curlews, avocets and lapwings, to name but a few.

In order to protect our wonderful estuarine environment and its wildlife, please look at the attached maps to see which are the most sensitive wildlife areas to avoid:"

Link to RDA Guide

<https://www.riverdeben.org/wp-content/uploads/2021/04/Protecting%20wildlife%20when%20canoeing,%20kayaking%20and%20paddleboarding%20on%20the%20Deben%20-%202021%20maps.pdf>

5. Should dates and times of operation be imposed?

NO to limitations on dates/times of operation but **YES** to imposed speed limits as in the byelaws and to be imposed all year round

6. How should the policy be enforced?

This is an area of significant concern: Not only the **current lack of enforcement** of the existing byelaws for private pleasure craft, including RIBs and jet skis, but **how** any licensing conditions would be enforced for a commercial licence.

To this end, the RDA would be pleased to coordinate with ESC (and other river organisations, e.g. Fairways Committees,) towards the creation of a part-time Water Bailiff/Warden position for the Woodbridge waterfront / Deben Estuary (details to be worked upon, consulted and agreed) which would have multiple benefits beyond enforcing any conditions of the commercial licence.

7. Any other comments?

The ESC Licensing Committee's consultation on 'Licensing of Jet Ski/water scooter Commercial Operators' has attracted a lot of public concern. However, any ESC commercial licence will have no jurisdiction on private jet skis and RIBs, which, though regulated through the byelaws, are unpoliced and thus present the wider potential nuisance and danger and are the root source of the public's concerns.

The RDA intends to engage with the ESC Cabinet Member for Planning & Coastal Management to take these matters forward, following its own consultation with its members on topics such as: -

- a) speed limits on the river
- b) applicability of speed limits through the year
- c) the provision of information at launch sites
- d) the provision of Slow Down buoys
- e) the feasibility of policing any regulations

The RDA Committee
23 November 2024