



Respondent No: 3

Login: Anonymous

Email: n/a

Responded At: Feb 23, 2022 08:53:05 am

Last Seen: Feb 23, 2022 08:53:05 am

IP Address: n/a

Q1. First name	Jamie
Q2. Surname	McBride
Q3. Organisation	J O'Donnell Customs
Q4. Please provide your email address	
Q5. Your submissions will be made publicly available, with personal details redacted. If you do not want any part of your submission published, please indicate this clearly.	I agree for my submission to be made publicly available, with personal details redacted.
Q6. Do you have any feedback on the marine safety functions under the Act?	No
Q7. Do you have any feedback on the provisions of the Act in relation to the Maritime Advisory Council or the Waterways Fund?	No
Q8. Do you have any feedback on the Port Authority or private port operator provisions in the Act?	No
Q9. Do you have any comments on the Act coverage of port charges and the port price monitoring scheme?	No
Q10. Do you have any feedback on the management of wharves and moorings under the Act?	No
Q11. Do you have any feedback on the Act powers relating to port facilities?	No
Q12. Are there any issues with access to relevant information? If so, what are the expected impacts of accessing additional information?	No
Q13. Do you have any suggestions to improve the Act to ensure it appropriately supports the management of NSW's ports and maritime operations?	No

Q14. What has PBLIS achieved since introduction and what it is achieving now?

It has achieved better turn around times for carriers but it is also unfairly punishing carriers for late arrivals that are caused by outside parties such as empty yards who are often owned by the CTO's themselves

Q15. Are there inefficiencies in other parts of the port landside supply chain not under PBLIS? How would these be best addressed?

Yes, empty return depots need to be brought into line both with performance and pricing. Not all that long ago it was free to return containers, now some yards are charging more than \$100 to return a container. Where is the justification in these prices? Further to this there are depots that can take 2 hours to service trucks on a regular basis. How is this acceptable when they are charging a premium price? Also these depots are more often than not the cause of late arrivals at the terminals so carriers end up paying a premium price for no service then a penalty for arriving late, this could end up as \$150 or even \$200 for a container. Empty yards need to be brought under PBLIS or a similar scheme to hold them accountable for their service. They should also be made to justify their prices as they have more than quadrupled their prices since Containerchain first came into play.

Q16. What changes, if any, could improve the current PBLIS arrangements, whether in the Act, Regulation or Mandatory Standards? What are the expected impacts of those changes?

1) Small carriers need to be treated differently to large carriers as they do not have the same capabilities. Large carriers run 24/7 and can therefore utilise any slot available, whereas small carriers more often than not can only work limited windows and therefore should have easier access to premium slots. The current A & B class booking system simply does not work. Small carriers also need leniency when it comes to PBLIS penalties as they are not easily able to cover for drivers calling in sick or running late for slots. 2) Stevedores also need to be more willing to work with carriers rather than against them. Bringing vessel availability forward after already advertising free time and especially after slots have been released should not be allowed. 3) Any vessels that have issues and availability changed or even removed for certain periods of time need to be clearly advertised once available again. Stevedores should be sending updated emails on a daily basis if a vessel is delayed in unloading or sent back out to sea. The vessel ETA and availability list should be updated with ACCURATE information on ETA's and availabilities on a daily basis. 4) Current Stevedore customer service levels (Patrick's most notably) are at an all time low and need to be drastically improved. Yard managers need to be held accountable for their actions, not just be allowed to ignore phone calls and not assist carriers in need. It is nearly impossible to get a hold of a yard manager at Patrick's these days and when you do they simply refuse to assist. This needs to be improved immediately. Stevedores need to be reminded that we are all trying to work together and smooth operation for carriers means a more efficient terminal. 5) Vessel availability also needs to be changed, especially SICTL's practice of making vessels available at 23:59 as this is effectively one full day of free time in the eyes of many shipping lines which is extremely unfair. There is absolutely no need for this practice, a free day should be 24 hours, not 1 minute. 6) Vessel availability should also not be allowed to include both weekend days in the 3 free days. If a vessel is made available on a Friday then it should get 4 free days, same as if it is made available on a Saturday. 7) Public holidays should be treated exactly as that, a holiday for the state or nation to enjoy a day off. If the terminals choose to operate on a public holiday that is their choice to make but it should not be counted as a free day for vessel availability ever again. This goes even more so for slot releases as it has become a common theme now to release slots on a public holiday rather than double or triple releases prior to and after the public holidays 8) If a terminal stops working for more than 4 consecutive zones then any vessels affected should immediately be given an extra free day of availability. Currently I believe it takes 12 zones to bring this into force but the stevedores play that perfectly and avoid extending free time. 9) Container and slot statistics should be readily available to carriers to ensure the terminals are playing fair. Carriers should be able to see how many containers are getting discharged per day and how many slots are being released per day

Q17. Are there any unintended impacts of PBLIS on the movement of goods through Port Botany? If so, how should these be addressed?

not answered

Q18. Are there any aspects of the application of PBLIS to stevedore operations that create inefficiencies in the landside supply chain? If so, how can these be improved?

not answered

Q19. Are there any aspects of the application of PBLIS to road transport operations that create issues in the landside supply chain? If so, how can these be addressed?

not answered

Q20. Are there any aspects of the implementation of PBLIS that create issues in the supply chain? If so, how could the administration of PBLIS be improved?

not answered

Q21. Does PBLIS remain the best approach for promoting the efficient and productive operation of the landside interface at Port Botany into the future? Are there ways that PBLIS could be improved?

Yes, PBLIS is the best approach however it needs to hold the terminals more responsible than the carriers and not have so many loopholes for the terminals to exploit
