

PAMA & PBLIS submission document.

Question 9: What has PBLIS achieved since introduction and what is it achieving now?

Established set base requirements.

Forums for industry discussion, to influence productivity gains across industry.

It has also given interests a platform to continue to influence wider Port Botany freight precinct thinking & policy for their own benefit rather than the immediate affected companies & industries.

Question 10: Are there inefficiencies in other parts of the port landside supply chain not under PBLIS? How would these be best addressed?

Yes, there are inefficiencies in all established businesses and supply chains. This gives entrepreneurial operations scope to disrupt the established market.

Inefficiencies across the supply chain are created by the various competing demands of a fractured supply chain all competing for their own best commercial outcomes. This applies through all businesses in the supply chain from shipping lines right through. Education is the key rather legislation.

Question 11: 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?

More needs to be done around peak use to drive utilisation of shoulder and non-peak times across weekends.

ADVANCED BOOKING SYSTEM (in place in DPW-FIT) introduced for terminal bookings to eliminate slot drops and the two-tiered (B & A class) approach to carriers driving productivity.

ADVANCED BOOKING SYSTEM would support the NSW government goal of '*an Advanced Container Booking System to ensure certainty of collection and utilisation of unused booking slots*' Pg55. NSW Freight and Ports Plan 2018-2023

Question 12: Are there any unintended impacts of PBLIS on the movement of goods through Port Botany? If so, how could these be addressed?

Question 13: 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?

DPW would like to see the ADVANCED BOOKING SYSTEM (in place in DPW-FIT) introduced for terminal bookings to eliminate slot drops and the two-tiered (B & A class) approach to carriers. This works to even the playing field between carrier classes (increasing competition & utilisation) and reduces terminal administration costs for associated slots drops.

It would free up a large portion of unused (no show) slots daily – might have some negative value on terminal penalty streams to be off-set by increases in fees elsewhere.

ADVANCED BOOKING SYSTEM would support the NSW government goal of 'an Advanced Container Booking System to ensure certainty of collection and utilisation of unused booking slots' Pg55. NSW Freight and Ports Plan 2018-2023

Any additional slots issued over and above the minimum requirements should be outside of PBLIS penalty schedule applied to Stevedores. This also would continue to include stack run slots and empty returns.

Schedule 2 of the Mandatory Standards. (1) DPW service line – DPW Truck Turn Times unfairly reflective of the Simblist Rd /Friendship Drive precinct. (7 other depots? influencing TTT data on the board at the entry point into the DPW precinct, and standard and extended queue data).

Question 14: 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?

More needs to be done around peak user penalties to drive utilisation of shoulder and non-peak times across weekends. My conversations to TfNSW are that it is cheaper for transport to leave units on storage than employee staff over the weekend to move containers. Incentivise weekend take-up.

Increase in road user charges for peak loading periods.

Rail lift tariff need to be increased, could be argued with a CPI linked increase.

To meet any demand for an increase in slots per hour – DPW would need to build controls in to limit peak demands. Potential controls could be - time zones would have to be strictly hour to hour. Early arrivals and late arrival units – manifests would be cancelled; slots would have to be re-booked. New slots issued, cost on the carrier.

Late arrivals to be charged if trucks fail to arrive in the first 50 minutes of the hour-long time zone as this impedes servicing of the following hour. Increasing the chances of SIT for following visits.

Question 15: 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?

Simplifying PBLIS – Mandatory standards of the regulation.

Streamlining out the below dictionary terms through the regulation to increase competition.

Section 15 Slots to be simplified through use of the ADVANCED BOOKING SYSTEM. Stack runs, DRE's and company slots should fall outside of the PBLIS

Dictionary terms - Weekday, weekday period, weekend period – should be replaced with working days only.

Large & small carriers should be replaced by the standard term carrier - as to show no competitive advantage

Question 16: 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?

A.....It could be argued that the time of PBLIS has passed, it has achieved its stated aims and regulation only protects non-competitive behaviour from smaller transport operators who continue to operate under the protection of PBLIS.

B.....Needs to be heavier penalties for accessing the port area during peak times to encourage the up take over weekends and non-peak times.