

HUTCHISON PORTS SYDNEY

**SUBMISSION TO TfNSW
on
PAMA and PBLIS REVIEW**

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Version 01



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Submission to Transport for NSW into the PAMA and PBLIS Review 2022

Hutchison Ports Sydney welcomes the opportunity to make a submission to the PAMA and PBLIS Review. Port and transport efficiency is vital to the supply chain and the economy of the state.

Introduction

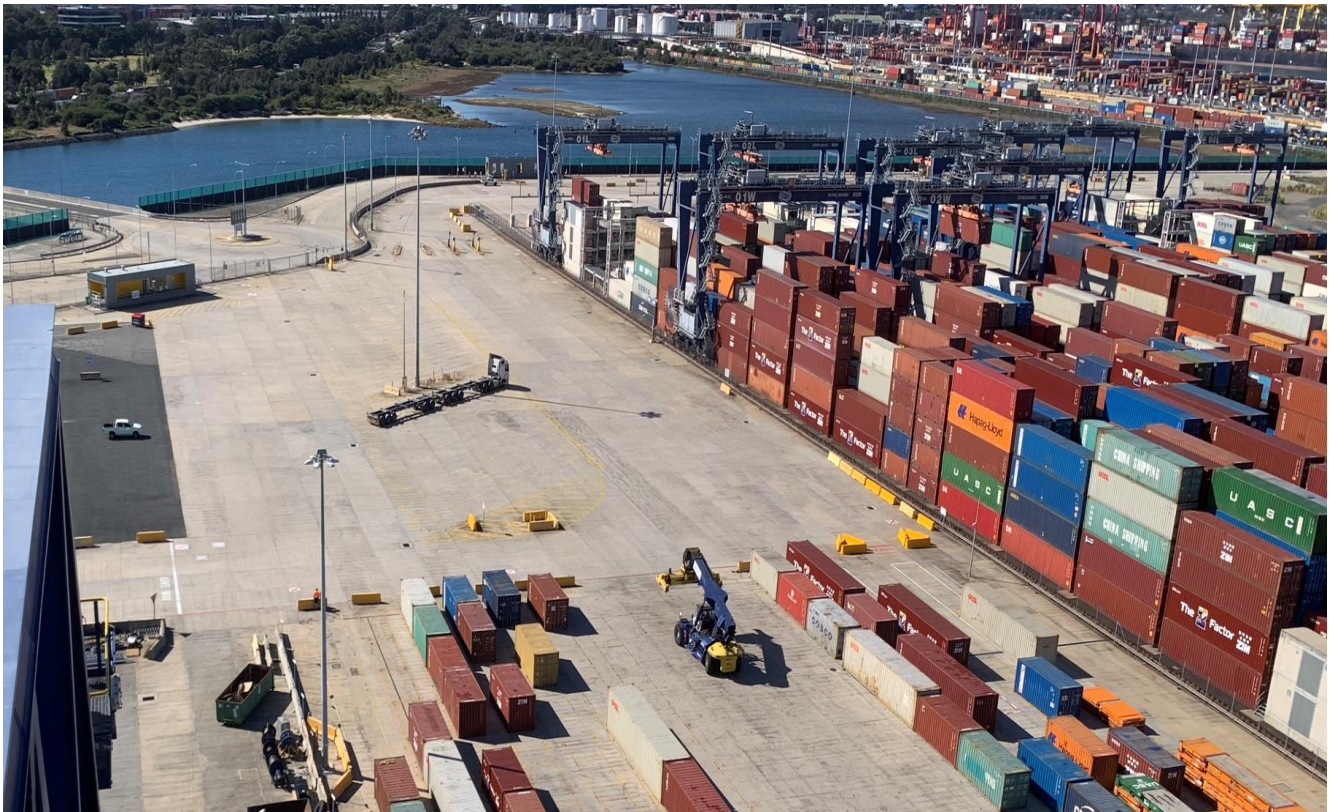
1. Hutchison Ports Sydney (HPS) operates a container terminal in Port Botany that serves international shipping services that connects with road transport and rail operations. HPS commenced operations with the arrival of the first vessel in November 2013. Establishing a third container terminal in Sydney was important to encourage innovation, increase capacity and help eliminate bottlenecks.
2. The HPS terminal is regarded as semi-automated terminal and HPA was the first to introduce to the Australian waterfront the Automated Stacking Crane (ASC) mode of operations. With ASC operations the containers in the yard are stacked and stored automatically by the ASCs controlled by the terminal operating system. This ASC mode of operations makes maximum use of space for storing containers in the yard by enabling containers to be stacked five high, as compared to other container terminal designs that stack containers two-three high.
3. The Automated Stacking Cranes are also used to load and unload containers on and off trucks. The main section of the terminal consists of six container stacks and each stack is equipped with a Landside ASC to load/unload trucks (ie the terminal has six handling points to load/unload trucks). Rail containers arriving on trains are loaded and unloaded by reach stackers in the rail yard area of the terminal.

PBLIS

4. HPS supports the idea of PBLIS which was created to improve efficiency at the interface between the terminal and road or rail. The management team at HPS have over the years developed a deep understanding of all the PBLIS processes. The team at HPA has experienced the many issues over time that impact terminal operations as well as transport and rail operations.
5. *As an ASC terminal some of the existing PBLIS standards are inflexible or difficult to work with and this has caused inefficiencies which have disadvantaged both HPS and the transport companies in terms of penalties and fines as well as delays and loss of available slots.*
6. Hutchison Ports Sydney would like to submit the following proposal as a way to improve container turn times and enhance current issues associated with the rigid PBLIS Mandatory Standards under Part 3 of the Ports and Maritime Administration Regulation 2012.



ASC operations at Hutchison Ports Sydney



Advanced Bookings – Part C

7. Hutchison Ports Sydney believe the current process of releasing vehicle booking slots under the current Mandatory Standards is no longer the best in class solution and we would like to see an advanced booking approach. Carriers would submit containers they are due to collect as soon as practicable to the Terminal and set the criteria for the bookings. Once the containers have met the predefined business requirements, the VBS will then allocate optimal slots for the Carrier. We believe this solution would give the following benefits:

- Remove the rush at slot drop time
- Remove the ability for Carriers to hoard vehicle booking slots
- Allow for Terminal Operators to better understand carrier volumes prior to collection and align to collection areas if required (improve HPV TTT)
- Increase slot availability for Carriers and minimise slot wastage

Unforeseen Events – Part C 16.1

8. The current application process for Unforeseen Events is not conducive for Terminal Operators to continue to operate under a reduced offering as you are required to cancel a full Time Zone.

9. We would like to see the opportunity to lodge an Unforeseen Event for a particular location in the Terminal. E.g. Hutchison Ports Sydney operates with Auto Stacking Cranes (ASC). The Six ASC blocks can be impacted separately and the ability to lodge an Unforeseen Event for a particular ASC block would assist industry. Key Benefits
- Terminal Operations would continue to operate at a reduced level
 - Reduce the impact to Carriers

TTT Reference Table – Schedule 3, 1

10. Hutchison Ports Sydney would like the time adjusted to

TTT for one Container: 50 Minutes

Additional TTT for each additional container: 15 Minutes

Hutchison Ports Sydney would also like the Measurement of TTT to be more agile.

Current:

- From Time at which Truck Arrives until Stevedore has achieved job completion

Proposal:

- From Time at which Truck Arrives with adjustments to occur for untimely movements within the Terminal until Stevedore has achieved job completion.

Determining Truck Turnaround Time – Schedule 3, 2

11. Hutchison Ports Sydney propose the below adjustments

(a) No change

(b) Where a truck is receiving or unloading one Container, the TTT will be 50 minutes unless delays have occurred through gate activation stages. These delays will be added to the 50 minutes. Example below

12. Carrier enters Terminal Entry Gate and moves to Truck Parking Area (TPA). Call Up Board notification requests Carrier to proceed to ASC Blocks via Yard Entry Point (YEP) Gate. Carrier does not see message as is in the Driver Amenities Building (DAB). Carrier proceeds to YEP Gate 15 minutes after being called forward. Then Carrier then takes a further 15 minutes to transit from YEP and reverse into the allocated ASC. As 5 minutes is a reasonable transit time for each transition point, 20 minutes will be added before penalties apply for the first container. 50 minutes becomes 70 minutes for first container.

TPA to YEP Gate: 5 minutes allowed transit

Activate swipe on at ASC: 5 minutes allowed transit

This is a total of 10 minutes from call up time to swipe onto ASC.

Late Arrival Carriers

13. Hutchison Ports Sydney propose the below adjustments:

- When a Carrier arrives in the terminal late for a Time Zone all transactions should be exempt from TTT penalties as it has an impact on the subsequent Time Zone

Direct Return Empty Containers

14. Hutchison Ports Sydney propose the below adjustments:

- When a Carrier uses an export slot to return an empty container designated for an empty pool, the empty container TTT should be exempt. If the Carrier is collecting a full import container, the full container TTT will commence on job completion of the empty container.

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Further Information

15. Hutchison Ports Sydney believe these important adjustments to the Mandatory Standards would assist industry significantly and improve the Terminal access for all Carriers.
16. HPA welcomes further discussions with TfNSW to discuss these issues in more detail.