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Alliance Transport Pty Ltd

Port Road Interface

5. **PBLIS Recommendation 1: PBLIS Performance Scheme**

Introduce (via a managed transition process) a regulated performance-based incentive scheme for the stevedore and road interface that rewards efficient performance of stevedores and road operators, and provides flexibility to support innovation in landside operations. Monitoring will provide transparency of ongoing landside performance. Government should retain the potential to re-introduce the current, prescriptive PBLIS rules if port performance deteriorates.

Every Week Stevedores send out incorrect invoices covering charges and Fees that should not apply.
There is no opportunity for Transport for NSW to measure and verify these penalties. Incorrect codes are used for penalties and it is left to the carriers to fight their own battles. How does it apply to the above when things now are not captured by Transport for NSW? A Performance Scheme should be based on High percentages. If we are looking at improving efficiency in the Port for all parties. We should be looking at a Benchmark at a minimum of 96% -97% for Port performance not the 93% as outlined in the meeting. We need to continue to improve Truck Turnaround Times and on time arrival of trucks for zones. Like Road Freight NSW I would like to know more about how this proposal would work. The devil is obviously in the detail, and we need to be involved in these discussions.

6. PBLIS Recommendation 2: Change carrier cancellation rules to take or pay

Change the slot booking notice period and cancellation rules for carriers to a take or pay arrangement.

Not a good Recommendation. Carriers are paying a high price for time slots and associated costs. There are a lot of variables as to why carriers hold slots. Carriers can only hold import slots with container numbers that are legitimate and have been downloaded by the Shipping Line by EDI. Once containers are saved clients are notified. On occasions clients are unable to accept containers at a specific time and date for a whole lot of reasons. Therefore, carriers will re-evaluate what they are doing and how they will operate. Quite often carriers do not obtain what they want and search the system to obtain other slots that they can run more efficiently with.

7. PBLIS Recommendation 3: Facilitate no booking until discharge

Enable stevedores to voluntarily implement a no booking until discharge system that allows container pick up booking once the import container has been discharged from the vessel.

This is a terrible recommendation. We are going backwards with this recommendation. Not in favour at all. What happens if your container discharges after the first day of availability. What I mean by this is if the vessel is officially available on Monday, but your containers do not come off the vessel until Monday Morning, Afternoon or night then you have lost the opportunity to collect the container on Monday Tuesday or Wednesday. Most likely you would have to collect this container on Thursday when Storage would be applicable. This Recommendation is about storage revenue for the Stevedores. This Recommendation is not about efficiency it is about stupidity. The more containers we can move prior to first day of availability the better. Once we remove containers from the terminal prior to availability the more space the Stevedore has to place more containers on the ground. Stevedores would run out of yard space to hold containers and work economically. Most likely the Stevedore will have to stack containers at a higher level and then complete additional lifts to dig the correct container out of the stack for the carrier. This would increase TTT at the Stevedores premises. We should be leaving the Booking System as it currently is. If we are unable to move containers prior to availability the proposed system will create further congestion at the Terminal. This proposal would affect clients receipt times at their premises as well as 3rd party warehouses. At the present time importers and exporters deliveries are based on availability dates. Carriers book and commit themselves to delivering containers on availability information. If carriers had to wait to after the event to book and notify their clients there most likely would be no space to book containers in for delivery. Carriers would then be holding more containers in their yards. How does this operate if carriers are only in a position to book containers in for collection after business hours. Nobody is around to confirm the booking and that the client can take the container. This would create additional work pressure on Carriers to have staff available 24 x 7 to book slots. It may work for the 5 largest carriers who can operate 24 x 6 or 24 x 7 but not for all of the other carriers. This Recommendation is Archaic and does not help improve Port Efficiency in any shape or form. This Recommendation should be binned and not even discussed.

8. PBLIS Recommendation 4: Staggered time zone commencement

Facilitate the optional commencement of truck servicing time zones every half hour instead of every hour.

Not in favour of this Recommendation at all. A clock face has 24 hours. Why do we wish to create 48 time zones within a 24 hour period? Once again this is about the Stevedores gaining additional revenue from Storage and late zones by carriers. Carriers would be paying more and completing additional work. It is hard enough now for Container Carriers to get back to back zones when booking time slots. This is a major reason why Truck Density has dropped over the years. Carriers unable to get enough time slots within a 1-2 hour period to maximise truck loads. With this Recommendation carriers could try and book 4 x 4am slots for example but the system provides them with a 4am slot a 5am slot and 2 x 6.30am slots. How do we maximise the payload when this occurs. Carriers work hard enough now booking and managing time slot bookings for 24 x 1 hour period. From a carrier's perspective it would be more beneficial and strategic to have 12 x 2 hour booking windows. This would create more opportunities for carriers to obtain more time slots in a 2 hour window and utilise less trucks to perform the tasks at hand. A minimum of 108 slots for every 2 hours would be more efficient for all parties. Carriers would most likely increase Truck Density by having more flexibility in how many containers can be moved and be able to manage their fleets with a better truck ratio / density. Reverting to a 2 hour window would assist carriers in making time slots on time and not paying penalties for late arrivals. Based on the average TTT of between 22 - 28 minutes we can safely say that carriers would be loaded within 30 minutes with 45 minutes being the worst case scenario. Using the same booking window of trying to obtain 4am time slot zones that we received then we would operate the following way assuming that deliveries are being made.

4am slot. TRUCK 1 goes in between 4am - 4.15am for a 6am delivery.

5am slot. TRUCK 2 goes in between 5am - 5.15am for a 7am delivery.

6.30am slots. TRUCK 3 goes in between 6.30am - 7.15am for 8.30am - 9am deliveries. We may need to send a 4th truck in depending upon weights.

The above delivery times are based on a travel time of 60 minutes from Port Botany which is most likely within 50 kms from the Port.

Alternatively, if the containers are being delivered within 15-30 minutes from the Port, then transport companies would send their trucks in at a later time than when slots open up. Using the same slot ratio as above. we would operate the following way.

4am slot. TRUCK 1 goes in between 4.30am - 4.45am for a 6am delivery.

5am slot. TRUCK 2 goes in between 5.45am - 6am for a 7am delivery.

6.30am slots. TRUCK 3 goes in between 7am - 7.45am for 8.30am - 9am deliveries. We may need to send a 4th truck in depending upon weights.

By moving to a 12 x 2 hour window this would assist carriers based South, North and West of the Port. They can plan their truck trips with more certainty and bring empty containers into the Port and de-hire them from 6am for example. If the Empty Container Park had delays or issues the carrier would still have until 8am to arrive. Normally they would be penalised for a late arrival from 7am. This would spread the arrival of trucks over the 2 hour period.

Once again, this Recommendation would create additional work for carriers. It will cost the carrier additional time and effort to run their fleets as well increased costs. It will also increase Truck Trips to the Port.

This Recommendation would lead to 1 truck 1 container movement at Port Botany.

Under my suggestion of 2 hour windows carriers would have greater flexibility in managing their fleets. We would have a more streamlined approach to sending vehicles to the terminal. What I mean by this carriers would not be sending their trucks in at 4am for example if the delivery times are staggered from 5am - 7am. Trucking companies would utilise the 2 hour period to their advantage.

Opening slots early is an advantage.

9. PBLIS Recommendation 5: Differential pricing of time zones

Stevedores should consider applying different prices to truck time zones to encourage 24/7 landside port access.

Not in favour of this at all. What is the difference between a 1am slot and a 1pm slot? 2am slot to 2pm slot? and a 3am time slot and a 3pm slot? Most likely from a carrier's perspective the majority of these containers will be going back to the carrier's premises to be staged for delivery the next day. There should be no Differential of Pricing. The majority of carriers double handle their containers now. Why should the Stevedore receive additional revenue for completing the same task at different times of the day. They are a 24 x 7 hour operation. . Stevedores currently change their hours of operation. Some close down from 2pm on a Saturday and Reopen from 6am on Sundays. On other occasions some Stevedores do not operate on a weekend at all.

Let's look at flipping the Recommendation on its head. We need to incentivise the industry to work in together and obtain better results for all. What about 2 better Recommendations.

1) Have the Stevedores reinvest some of the Revenue they have been collecting over the last 7 years for access and pay carriers to collect containers outside Peak Hours. This would encourage Carriers to work at night and on weekends and Public Holidays to move containers. This would improve Port Congestion. Why should the carrier pay more fees to a Stevedore for access to the Port. There has been an increase of over 900% in charges since 2018. In my opinion if the Government and Transport for NSW are really serious about moving more containers on weekends and Public Holidays then the Stevedores should pay carriers a fee on a Saturday and a higher fee on a Sunday to collect containers. Another Fee should apply to Public Holidays as carriers have to pay penalty rates. This would improve the take up of slots with out of hours collections plus weekend and Public Holiday periods.

This would create opportunities for carriers to be rewarded for working weekends when penalty rates apply and the Stevedores would have more space to place the next lot of containers. It is win for everyone going forward as the Port continues to grow.

We would not have the situation on Mondays with delays at the Port due to the congestion of imports on the ground.

Why are we always asking the carriers to pay more for access. Prior to 2018 these fees were never charged. From an Importers perspective they have lodged the Original Bill of Lading and paid the Freight and Port Charges to the Shipping Line. They are then given an Electronic Import Delivery Order (EIDO). The Original Bill of Lading is a document of title and provides the Consignee or Notify party on the Bill of Lading access to the container after paying the relevant shipping charges.

If we are fair dinkum about encouraging 24/7 Landside Port Access then this a better way to move forward. Stevedores would be reinvesting the money that they have collected so it is not being passed down the supply chain to importers / exporters and then us as consumers.

2) The other possible suggestion here would be Stevedores not to charge carriers the Infrastructure Levy, Landside Terminal Charges and Access charges. when containers are being collected on a weekend or Public Holiday. This would be beneficial to the entire supply chain. There would be no on costs being passed onto Freight Forwarders, Custom Brokers, Importers and Exporters. This would assist the entire State of NSW from price increases and would reduce additional costs significantly. Carriers would not charge their clients it would result in lower costs for every consumer is NSW as the Infrastructure Levy, Landside Terminal Charges and Access charges are not being passed on for weekend work and Public Holidays..

This Recommendation would save the NSW Economy thousands and thousands of dollars per annum.

10. PBLIS Recommendation 6: Remove the broad power for regulating stevedore charges

Remove the broad Regulation power for regulating stevedore charges, and remove associated PBLIS stevedore charge notification and government assessment requirements

Not in favour of this at all. Stevedores need to be accountable for all charges that are implemented. At the moment it is a free for all and no checking or diligence by any Government body on when charges can be increased and by how much. Nothing is related to CPI. Transport for NSW needs to have more powers under the Act to check, scrutinise, question and review all requests. Prior to 2018 we previously had Price Regulation. This appeared to have ceased when there were changes of leadership at Government and Transport for NSW. Carriers have been paying regularly increases in fees since 2018. Within 6 years there has been an increase of over 900%.

11. PBLIS Recommendation 7: Apply late penalties per truck trip rather than per container

Apply PBLIS late arrival penalties per truck trip rather than per container.

In favour of this Recommendation.

12. PBLIS Recommendation 8: Apply unforeseen events to terminal sections

Increase flexibility in stevedore unforeseen event application to allow partial closure of a stevedore terminal for an impacted time zone, instead of the whole terminal during that time zone.

This is a tricky one for the industry. Each terminal is different in how they operate. Need further discussion and clarification on how this would work in the future. At the present time carriers are now automatically notified that the issue is an Unforeseen Event at the Terminal by the Stevedore. It still has to be checked and reviewed by Transport for NSW. There is a huge discrepancy in the time from when the incident occurs and as to when an Unforeseen Event is granted or not granted. Carriers are left to fend for themselves and obtain time slots as soon as they can to avoid potential storage costs and other landside charges. One Stevedore does not provide any location of where containers are on the Terminal. With this individual terminal we would not know where our containers are and the impact it would have on futile trips to the Port.

13. PBLIS Recommendation 9: Update penalty rates by Consumer Price Index (CPI)

Backdate PBLIS penalty rates by CPI from 2010 and apply ongoing annual CPI increases.

I do not believe that CPI is an accurate measure of increases. Some economists believe that CPI doesn't capture all items in the supply chain. Areas of discrepancy occur in a number of areas. The price of Houses, Gas and Electricity, Building industry prices and other sectors.

Why do we need to backdate the penalty rates from 2010. What happens when CPI doesn't increase? What happens when the CPI drops from 1.5% for example to 0.5%. Do we decrease the penalty rates or hold them as they are?

Why don't we just start with new figures from the 1/7 or 1/1.

14. PBLIS Recommendation 10: Remove large and small carrier classifications

Remove the option for stevedores to separate carriers into Large Carriers (Class B carriers) and Small Carriers (Class A carriers) for the purpose of releasing slots.

This would create major problems for the top 10 Carriers.

At the same time, it would assist small to medium sized businesses grow by having access to more slots. What we need here is for more carriers to be allowed Stack Run Access. As an industry we should be looking at a minimum of 25 - 30 containers to be moved rather than the current quota of 50-60 per vessel. This would provide greater opportunity for carriers to move more containers outside of the PBLIS and would then create greater opportunities for other carriers to utilise the time slot booking system. As a Medium sized carrier how do we grow our business to obtain more slots.

15. PBLIS Recommendation 11: Remove TfNSW approval for stevedore import and export slot allocation

Remove the requirement for TfNSW to approve the stevedore import and export slot allocation.

Why is this being Recommended at all. This needs to be kept in place. It has been proven over the last 10-12 years that the ratio of imports to exports should be about 78% - 82% imports and 18-22% Exports.. Previously Stevedores could manipulate the system and reduce import slots to around 65% and carriers would then pay more storage on containers as they would not get enough slots.

Not in favour of this being removed.

Data Transparency

16. PBLIS Recommendation 12: Road data transparency

Increase the information publicly available on stevedore truck servicing and carrier performance, and improve data provided to government.

Why did it stop?

17. PBLIS Recommendation 13: Rail data transparency

Provide detailed information on stevedore rail window and rail operator performance to industry, make data publicly available, and encourage visible container tracking.

Why did it stop?

18. PBLIS Recommendation 14: Empty container data transparency and efficiency

Require empty container storage facility data and make suitable data publicly available, and require empty container redirections be provided in an appropriate electronic format.

Empty Containers should have been included under Phase 2 of PBLIS. If this was done, we would have the data, transparency and efficiency in the supply chain. We have the highest Empty Container Re-directions in place of any State in Australia.

19. **PBLIS Recommendation 15: Freight Community System (FCS)**

Progress development of a FCS Strategic Business Case and, if positive, develop a phased implementation plan to proceed as a high priority.

This was raised in 2018 and was going to be a priority. Nothing has been done and we are now trying to play catch up. Around the same time where has the PBLIS cost recovery fee gone to? A fee was created for the running of PBLIS. It is my understanding that it was collected as wharfage by the Stevedores and paid to NSW Ports and then transferred to Transport for NSW for the running of PBLIS. There was a lot more staff back in 2018 to manage PBLIS. Likely not in favour. What is included and what documents would the parties want.

Port Access

20. **PBLIS Recommendation 16: Second truck marshalling area**

Investigate the need and timing for a second truck marshalling area (TMA) and, if required, consider options for its development.

May not need this if we take up the option of Stevedores not charging Access Fees, Infrastructure Levies or Terminal Fees to containers for collection of containers on Weekends. Alternatively, Stevedores pay carriers to collect containers on weekends.

21. **PBLIS Recommendation 17: Certified transport operator access**

Introduce a certification requirement for container transport road operators at Port Botany.

My concern is who would have access to the information and why do they need the information. What is the Certification process? What is included and what documents would the parties want?
Not a fan of passing over possible confidential information onto a 3rd party.

PBLIS Recommendation 18. Not supported

PBLIS Recommendation 18: Engage NSW Ports as a service provider to administer elements of PBLIS, truck marshalling area and TfNSW camera network

PBLIS recommendation 18, to engage NSW Ports – the private port operator - as a service provider to administer elements of PBLIS has not been supported. The current arrangement where Transport for NSW administers the Regulation is considered appropriate at this time.

Port Rail

22. **PBLIS Recommendation 19: Remove regulated rail servicing arrangements**

Remove the regulation of stevedore rail servicing arrangements to allow stevedores to set charges and service terms as appropriate.

Another bad Recommendation. Needs to be controlled and regulated.

23. **PBLIS Recommendation 20: Improve governance frameworks to align public infrastructure managers with the port rail task**

Ensure public rail infrastructure managers (Sydney Trains and ARTC) requirements are appropriately aligned with the port rail task.

No Comment.

24. PBLIS Recommendation 21: Examine future rail options

As rail investments mature, consider further options for improving the interface and/or coordination between supply chain participants and functions.

No Comment.

25. General feedback