

Transport for NSW Port-Botany Landside Improvement Strategy (PBLIS)

The International Freight Forwarders and Customs Brokers Association of Australia (IFCBAA) is the independent and influential voice for international freight forwarders and customs brokers in Australia. We represent our members in international trade and advocate with Governments bodies and other relevant industry organisations on behalf of our members. IFCBAA operates as a not-for-profit organisation for the benefit of members and offers a wide range of services, products and events, including leading edge professional development, training, compliance, industry advocacy, forums, conferences and networking events. Globally, IFCBAA has formal alliances and membership with most major trade based and industry associations.

IFCBAA provide the following feedback on the 20 PBLIS recommendations:

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.

IFCBAA: Agreed in principle, based on industry participation and transparency rules surrounding the development and ongoing administration and auditing of such a scheme, noting that equity between carriers of all sizes and slot volumes will be paramount.

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.

IFCBAA: Insufficient details have been provided to date for IFCBAA to take a position on this proposed change, again transparency rules surrounding the development and ongoing administration and auditing of such a scheme, noting that equity between carriers of all sizes and slot volumes will be paramount.

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.

IFCBAA strongly supports this initiative that if implemented and maintained properly, will result in less forecasting estimates in carrier planning for import container availability times, which should also result in less cancelled slots by carriers and theoretically increased stevedore interface efficiencies and reliability.

PBLIS Recommendation 4: Staggered time zone commencement

Facilitate the optional commencement of truck servicing time zones every ½ hour i/o every hour.

IFCBAA strongly disagrees, a reduction from the current 60 min slot truck servicing times down to 30 minutes is not practical in Sydney, due to the expansive geographical area of the Sydney region, The increasing traffic congestion in the now widening peak hour periods and the specific congestion in and around the Port Botany precinct. Additionally, such a change would only serve to suit the larger carriers that are based in and close to, the Port Botany precinct.

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.

IFCBAA strongly agrees as there no incentives for carrier late shifts under the current scheme.

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.

IFCBAA: strongly disagrees, until such time as the establishment of a Federal regulatory body such as the Australian Maritime and Aviation Commission (or the like), then this power needs to be retained for possible future activation, in case this Commission (or the like) does not get established, or is not established in the medium to longer term.

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.

IFCBAA moderately agrees, assuming that this proposed new penalty method would reduce the financial aspect of a late penalty where multiple containers were involved in an individual truck and trailer combination.



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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.

IFCBAA: *100% agree.*

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.

IFCBAA *strongly disagrees, penalty rates should remain as is, with no backdated increase, but going forward, be subject to annual CPI increases.*

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.

IFCBAA *strongly agrees, the current Class B and Class A arrangement favours the larger carriers.*

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.

IFCBAA *strongly disagrees, to remove this current requirement could potentially ruin the effectiveness of the PBLIS system, by removing it's powers in this area and effectively transferring those to be at the individual stevedore terminal discretion.*

In addition to the need for TFNSW needing to retain these powers, the import and export slot allocation volumes for the stevedore terminals, needs to be reviewed at least annually, which currently is not the situation.

PBLIS Recommendation 12: Road data transparency

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

IFCBAA *strongly agrees.*

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.

IFCBAA *strongly agrees.*

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.

IFCBAA *strongly agrees.*

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.

IFCBAA *strongly agrees.*

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.

IFCBAA *strongly agrees, this would be a great initiative, the current truck marshalling area was originally designed for accommodating only 20' and 40' trailers, now that advancements such as super b doubles are becoming more common, the existing one marshalling area often gets very congested.*

PBLIS Recommendation 17: Certified transport operator access

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

IFCBAA: more information is required on this recommendation, so as to be able to gauge the reasonableness and effectiveness of such a certification policy.

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.

IFCBAA strongly agrees, TfNSW must remain as the service provider to administer elements of PBLIS, so as to ensure that impartiality applies in that role.

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.

IFCBAA strongly disagrees, such a change would serve to effectively replicate the existing port interface situation with import and export container movements, where the stevedore terminals have almost complete control of related charges and conditions.

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.

IFCBAA agrees.

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.

IFCBAA agrees, based on appropriate initial and ongoing industry consultation.

General feedback

IFCBAA appreciates the opportunity that industry has been given in being involved in the consultation process with this PAMA and PBLIS review.

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