



Australian Shipowners Association

QLD Coastal Sea Freight

Submission by: Australian Shipowners Association
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Executive Summary

- A. There are clear advantages to be gained from increasing the role of coastal shipping in meeting the National freight task. Numerous previous studies have identified the need for shipping to do more in terms of meeting the growing transport requirement.
- B. Coastal shipping certainly has many advantages in supporting future freight growth within Queensland. How that is structured and who provides such service would determine the ultimate benefits that might be realised.
- C. Critical for Queensland, a State with an extensive, environmentally sensitive, iconic coast line and enormous reserves of natural resources (which will require shipping for import and export for decades to come), is the assurance that professionals with seafaring skills will be available to provide critical 'shore side' roles. Such roles include (but are not limited to) marine pilotage for safe vessel transit through the Great Barrier Reef and Torres Strait; port state control officers to conduct robust safety inspections of visiting foreign vessels; Harbour Masters to manage the safety and day-to-day operation of the ports and to work on board the tugs providing essential harbour towage services and emergency response/salvage capability.
- D. It is therefore essential that any coastal shipping policy focus not only on encouraging shipping as a mode of transport but also encourages Australian participation therein (such as ownership management and crewing) to secure the strategic critical skills that Queensland, and the nation, will always require.
- E. In addition, a strong, local industry ensures Australia is better able to control domestic and international freight services and ensure service reliability as well as price stability to domestic markets. It provides the nation the benefits that flow from a diverse maritime economic cluster and importantly, a strong and sustainable local shipping industry has valuable strategic defence linkages.
- F. There are many different legislative instruments that create the regulatory framework within which coastal trading vessels must operate. These have long been complex and of recent times have been further complicated by multiple Commonwealth agencies changing their policies in ways that adversely affect the industry under the guise of consequential amendment.
- G. Parts of the commentary provided under Section five of the briefing paper provided by the Department of Transport and Main Roads require some clarification to ensure that the Committee has an accurate understanding of the context around the *Coastal Trading (Revitalise Australian Shipping) Act* and more specifically the imposts on shipping by other Commonwealth agencies that are the result of decisions taken separate to those concerning coastal trading itself.

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1. Introduction

- 1.1 This submission is made on behalf of the Australian Shipowners Association (ASA). ASA represents Australian companies which own or operate:
- a. international and domestic trading ships;
 - b. Floating Production Storage and Offloading units (FPSO);
 - c. cruise ships;
 - d. offshore oil and gas support vessels;
 - e. domestic towage and salvage tugs;
 - f. scientific research vessels; and
 - g. dredges
- 1.2 ASA represents employers of Australian and international maritime labour and operators of vessels under Australian and foreign flags.
- 1.3 The trading fleet or ‘bluewater’ Members of ASA include companies whose primary business is to provide sea transport services to the freight market as well as companies whose shipping operations form an element of their supply chain, hence some of ASA’s Members are very large cargo interests.
- 1.4 ASA Members participating in domestic trade utilise the existing regime of General Licenses, Temporary Licenses and Transitional General Licenses. ASA Members are active in dedicated international trades under both Australian and foreign flags.
- 1.5 ASA provides an important focal point for the companies who choose to base their shipping and seafaring employment operations in Australia.
- 1.6 ASA’s purpose is to pursue strategic reforms that provide for a sustainable, vibrant and competitive Australian shipping industry and to promote Australian participation in meeting domestic needs for sea transport services and contribution to Australia’s international trade to the benefit of Australian shipowners, their customers and the nation.
- 1.7 ASA’s Members represent a very broad cross-section of the maritime industry, including shipowners, shippers and charterers. As a result, on some matters of coastal trading ASA Members have very different views. On these matters, this ASA submission reflects the view of the ‘Australian shipowner’, as distinct from the ‘shipper’ or ‘cargo interest’ view.

1.8 ASA's Members are:

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| ANL Container Line | MODEC Management Services | Sugar Australia |
| ASP Ship Management | The Port of Newcastle | Svitzer Australia |
| BP Australia | North West Shelf Shipping Service | Swire Pacific Offshore |
| Caltex Australia Limited | Origin Energy | Teekay Shipping (Australia) |
| Carnival Australia | P & O Maritime Services | The Shell Company of Australia |
| EMAS Offshore | PB Towage | Tidewater Marine |
| Farstad Shipping (Indian Pacific) | Rio Tinto Marine | Toll Marine Logistics |
| Maersk Supply Service | SeaRoad Shipping | |
| Mermaid Marine | Shell Tankers Australia | |

2. Terms of Reference 1 & 2: A scheduled ‘weekly’ coastal shipping service and competition in the Queensland freight transport sector

- 2.1. ASA is not in a position to comment on the specifics of the benefits that would arise from a scheduled weekly coastal shipping service along the Queensland coast in terms of reducing road and rail congestion and managing future freight demand. Similarly, the specific impacts that coastal shipping would have on competition in the Queensland freight transport sector are also best left to those directly affected to comment on.
- 2.2. Generally speaking, however, there are clear advantages to be gained from increasing the role of coastal shipping in meeting the national freight task. Numerous previous studies have identified the need for shipping to do more in terms of meeting the growing transport requirement.
- 2.3. Should a coastal shipping service establish the degree of modal shift that is likely is difficult to quantify given the inherent advantages / disadvantages of the various modes. Previous analysis has indicated that the scope for modal shift is very low; however the specifics of the requirements for Queensland as outlined in the Briefing Paper indicate that the scope for modal shift and competition between modes may be greater than previously identified.
- 2.4. Coastal shipping certainly has many advantages in supporting future freight growth within Queensland. How that is structured and who provides such service would determine the ultimate benefits that might be realised.

3. Term of Reference 3: Broader implications of coastal shipping policy

- 3.1. The implications on the broader community and economy of coastal shipping policy are strongly influenced by what that policy consists of. A policy that promotes shipping but does not support local/Australian content therein, such as ownership, management, crewing etc., will realise far fewer benefits than a policy that supports a level of Australian involvement in the provision of the actual ship.
- 3.2. A strong, local industry ensures Australia is better able to control domestic and international freight services and ensure service reliability as well as price stability to domestic markets. It provides to the nation the benefits that flow from a diverse maritime economic cluster and will ensure a pipeline for the necessary skills that allow an island nation to prosper.

Importantly, a strong and sustainable local shipping industry has valuable strategic defence linkages.

3.3. Maritime Safety

- 3.3.1. Critical for Queensland, a state with an extensive, environmentally sensitive, iconic coast line and enormous reserves of natural resources (which will require shipping for import and export for decades to come), is the assurance that professionals with seafaring skills will be available to provide critical 'shore side' roles. Such roles include (but are not limited to) marine pilotage for safe vessel transit through the Great Barrier Reef and Torres Strait; port state control officers to conduct robust safety inspections of visiting foreign vessels; Harbour Masters to manage the safety and day-to-day operation of the States ports and to work on board the tugs providing essential harbour towage services.
- 3.3.2. The only way for trainee seafarers to obtain the necessary experience is on board vessels of a certain size, as dictated by international convention. In many cases such vessel size requirements can only be met by the trading fleet of ships.
- 3.3.3. Without a strong, local industry to train such people Australia will necessarily become dependent on immigration in the future to secure such expertise. Relying on Australia's ability to attract an international workforce (that is likewise in demand by other nations) for such critical roles introduces considerable risk to Australia's maritime capability.
- 3.3.4. The existence of a local shipping industry ensures that the skills obtained through participation in and training from that industry are maintained within the nation. Should the domestic industry continue to decline and any incentive to invest in Australian based businesses be lost, ASA Members have grave concerns that the parts of the industry on whom the training burden currently falls will no longer be in the business of employing and training this strategically vital skill set and maritime training providers will lose entirely an already thinning training market.
- 3.3.5. It is therefore essential that any coastal shipping policy not only focus on encouraging shipping as a mode of transport but also encourages Australian participation therein to secure the strategic critical skills that Queensland, and the nation, will always require.

3.4. Environment Sustainability

3.4.1. In 2005 ASA undertook a detailed review of sea transport efficiency and atmospheric emissions.ⁱ Some of the key findings were:

- Shipping Supports 28.15% of the domestic freight task but contributes to just 2% of total emissions from the transport sector.
- For every small product tanker (~ 50,000 DWT) operating around the coast, over 800 B Double trucks would be needed on the road to move the same amount of cargo.
- New build engines are estimated to be able to achieve up to 30% greater efficiency than existing technology.

3.4.2. Clear government policy in relation to shipping and a serious commitment to emission reductions in the transport sector is essential in order to encourage modal shift and foster the significant private investment required to achieve further emission reduction in the Australian shipping industry.

3.5. Community Amenity – Road Trauma and Congestion

3.5.1. While noting that annual counts of fatal crashes involving articulated trucks have trended down at 3.5 per cent per year and for heavy rigid involvement is a slightly weaker decline of 2.2 per cent per year, fatalities involving heavy vehicles (not including buses) remain at 180 persons in 2013, 48 in Queensland.ⁱⁱ

3.5.2. There is little doubt that this level of road trauma could be reduced if more long-haul freight was taken off the road and moved by sea. Furthermore, the infrastructure cost in terms of maintaining roads suitable for heavy haulage could be reduced if more of the task moved to sea transport.

3.5.3. It is also important to consider the consequences of existing sea transport being moved to land transport options. Of recent times, one shipping service in another part of the country moved to rail transport and in Western Australia, the very recent removal of the State Government subsidy saw the ship dedicated to servicing the northern ports removed from service. The cargo previously carried by this ship is now

presumably being moved by road. As noted in the previous section, one small ship is the equivalent of 800 B-Double trucks on the road.

- 3.5.4. A true comparison between transport modes is only possible when the entire ‘cost’ of shipping vs. other modes, including infrastructure and social costs, is considered. This is necessary in order that the most efficient form of transport is utilised for any given freight requirement.

3.6. Defence Support - Strategic defence linkages

- 3.6.1. An Australian presence and capacity “on the water” increases border protection via merchant navy linkages with defence and customs. This relates to the ability of the Australian Government to requisition assets when required; access to commercial and logistical shipping expertise and the national security benefits of having Australian presence on the high seas and particularly around the coast. The benefits to defence, as articulated by the Department of Defenceⁱⁱⁱ include potential for greater cooperation in skills sharing and career opportunities.

3.7. Additional Economic Impact for Queensland

- 3.7.1. A strong local shipping industry provides for reliability and price stability in freight services. A greater degree of Australian control in the provision of shipping services will improve Australia’s economy via growth in national shipping activity and the maritime economic cluster – an inevitable flow on effect resulting from a stronger local shipping industry. It will also ensure that Australia retains the required expertise within its workforce to provide reliable and efficient shipping services.
- 3.7.2. A recent report by Oxford Economics^{iv} shows that in the UK in 2011 the total (including the direct and induced impacts) contribution of the shipping industry was £12.5 billion in GDP, 287,000 jobs and £2.8 billion in tax receipts. Further, the impact of the economic cluster that has developed around the UK shipping industry via the establishment of professional and associated services, contributed 55,000 jobs, £3.7 billion in GDP and £1.1 billion in tax receipts. The UK industry underwent a program of rejuvenation in 2000 involving the adoption of positive policies on investment, training and the British shipping registry.

- 3.7.3. Economic diversity is provided not only via direct shipping activities but also through the resultant maritime cluster activities. This includes employment for approximately 40,000 people across the nation.^v
- 3.7.4. A major part of any maritime economic cluster is the shipbuilding and repair sector. Recently the Forgacs heavy-ship repair yard at Caincross in Brisbane closed. The reasons for the closure have been widely discussed^{vi} however there is no doubt that recent decisions by regulatory authorities has so frustrated the shipping industry that it no longer makes commercial sense to persevere with perpetually changing government policy in order to use and support Australian businesses.
- 3.7.5. The loss of this business to the Queensland economy is unfortunate and many would say unnecessary. The loss of the service it provided to the shipping industry and the loss of the skilled workforce is a national concern. Aside from the ‘scheduled’ work that ship repair facilities undertake, they provide critical capability for the shipping industry when emergency repairs are required. For a nation so highly reliant on the shipping industry not to have a network of repair facilities available is unfortunate at best. At worst, it places additional risks on the environment and safety as non-seaworthy vessels will now be required to make the much longer journey (by tow or on their own even though compromised) to Singapore or elsewhere.
- 3.7.6. Coastal shipping policy should encourage the use of local Australian businesses not frustrate them (and their customers) to the point where they would rather do business elsewhere.

3.8. Disaster Relief

- 3.8.1. Shipping is uniquely placed to offer a service delivery model for remote and stranded communities in times of disaster relief, cyclones and flooding. Shipping can access places where road transport cannot during extreme environmental events. Queensland is very susceptible to these types of events which have a huge material impact on the local communities and economies.

3.9. Tourism and Cruise Shipping

- 3.9.1. The Australian cruise ship sector is the fastest growing cruise market in the world - having experienced over 20% growth over the last five years - and further growth is projected as destinations and the quality of tonnage continues to improve.

- 3.9.2. Importantly, the Australian cruise ship sector is of significant value to the Australian economy, generating \$2.9 billion in economic opportunity in 2012/2013.^{vii}
- 3.9.3. Either directly, through the interface with cruise ship operators, or indirectly with regard to passenger expenditure in port, the impact of cruise shipping on local economies is dramatic, stimulating local economic activity throughout the supply chain and assisting local industries to grow and expand.
- 3.9.4. The volume of high quality Australian agricultural products sought by cruise ship operators to maintain on board provisions for thousands of passengers is significant and forms an important source of income for many Australian businesses.
- 3.9.5. Furthermore, the demand for landside tourism and transport services stimulated by cruise ship port calls provides a great deal of economic opportunity, not only for Australian iconic port cities, but importantly, many regional areas.

4. Term of Reference 4: Cross-jurisdictional differences

- 4.1. To the best of our knowledge, the only State that seeks to regulate any economic aspect of intra-state voyages is Western Australia.
- 4.2. The WA system could be described as ‘nominal’ in that there is no established structure or process involved.
- 4.3. Our understanding of the requirements in WA is that if a non Australian-flagged ship is to be used a check must first be conducted that there is no Australian ship available that could do the work.
- 4.4. ASA has been contacted on a handful of occasions in the past to verify that no ship of the required type is available.
- 4.5. ASA cannot identify any issue from another State that would impact on competition and increase costs within the coastal shipping industry in Queensland.

5. Term of Reference 5: Review of Coastal Trading (Revitalising Australian Shipping) Act 2012

- 5.1. There are many different legislative instruments that create the regulatory framework within which coastal trading vessels must operate. These have long been complex and of recent times have been further complicated by multiple Commonwealth agencies changing their

policies in ways that adversely affect the industry under the guise of consequential amendment.

- 5.2. The briefing paper highlights the three tiered licencing system under the *Coastal Trading (Revitalising Australian Shipping) Act 2012* (CT Act) at page 9. To ensure the Committee is fully informed of the context around the CT Act and the consequences of its introduction, parts of the commentary provided under Section five of the briefing paper require some clarification.
- 5.3. In July 2012 the CT Act was introduced to replace previous provisions provided for in the *Navigation Act 1912* (Nav Act), Part VI.
- 5.4. The differences between the old and new ‘cabotage’ provisions are frequently overstated. Australia has had a ‘flexible’ cabotage regime in place for more than 100 years.
- 5.5. Both the Nav Act regime and the CT Act provide a nominal preference for an ‘Australian’ ship if and when one is available and suitable. It is acknowledged that Australia’s domestic trade will always need to be serviced by a combination of Australian and foreign vessels.
- 5.6. The CT Act changed the following things with regard to the regulation of domestic shipping:
 - ‘Permits’ to ‘temporary licences’
 - Applied licences to *voyages* instead of vessels
 - Required applicants to apply for a minimum of 5 voyages at a time
 - Applied a 12 month time limit on temporary licences
 - Increased tolerance limits
 - Increased reporting requirements on temporary licence holders
 - Clarified administrative requirements around application requirements and variations
 - Neither the old regime nor the new regime compels an Australian ship to exist.
- 5.7. What is considered ‘available’ and ‘suitable’ was at issue under the old Nav Act regime and has been clarified and made more flexible in the new CT Act.
- 5.8. The briefing paper states that the CT Act is based solely on economic regulation. The CT Act itself has several principals that go well beyond economic regulation and indeed specific detail is included in the Act such as safety issues being a factor that the Minister/delegate will consider when granting a temporary licence under the CT Act.

- 5.9. The briefing paper describes, as an example, impacts to Rio Tinto involving the movement of Bauxite from Weipa to Gladstone. As this is an intra-state voyage, it is not automatically covered by the Coastal Trading Act although the ability for such voyages to “opt in” exists.
- 5.10. The briefing paper states that an unintended economic benefit of the RUF system was that Customs and Border Protection were uninterested in pursuing compliance management of crew wages under the *Fair Work Act 2009* (FW Act).
- 5.11. There are two separate issues identified in this comment which are not as connected to each other as might be implied by the description provided in the briefing paper.

5.12. Crew Wages

- 5.12.1. The management of crew wages under the FW Act is not a matter for Customs and Border Protection – compliance for such is the purview of the Fair Work Ombudsman.
- 5.12.2. In addition, a foreign ship employing foreign crew through a foreign employer will ordinarily not be covered by the FW Act.
- 5.12.3. In particular, a foreign ship employing a foreign crew would only be subject to the FW Act if it was undertaking voyages pursuant to a “permit” (prior to 1 July 2012) or a temporary licence post 1 July 2012 when the CT Act came into force.
- 5.12.4. The existence of a RUF (or not) has no bearing on the payment of crew wages.
- 5.12.5. The requirement for foreign employers to pay foreign crew Australian wage rates was introduced in 2010 when a change was made to the *Fair Work Regulations 2009* which applied certain parts of the FW Act to single voyage permit (3 or more within 12 months) and continuing voyage permit vessels issued under Part VI of the Nav Act (now repealed). A consequential amendment was made to continue application of the FW Act when the CT Act was introduced – the obligation now being for vessels operating under temporary licences who have engaged in 3 or more voyages under a temporary licence (within 12 months).
- 5.12.6. As the CT Act does not automatically apply to intra-state voyages, neither do the provisions of the FW Act, which are enlivened through the operation of a vessel under a temporary licence.

5.13. Customs and Border Protection

- 5.13.1. Customs and Border Protection's potential impact on foreign vessels trading intrastate relates to decisions by Customs officials to "import" vessels pursuant to the *Customs Act 1901*.
- 5.13.2. Prior to the introduction of the CT Act, Customs were not importing vessels that were operating around the coast carrying domestic cargo in either intra-state, interstate or intra-territory operations. The general understanding within industry circles was that a vessel could operate on the Australian coast for 90 days before it would be imported.
- 5.13.3. Since the introduction of the CT Act there has been a noticeable shift by Customs. After a period of considerable uncertainty, Customs determined that they would not import vessels that are operating pursuant to a temporary licence.
- 5.13.4. Therefore, owners and operators of vessels that are not operating pursuant to a temporary licence (because they are not obliged to) have been directed by Customs to import vessels.
- 5.13.5. ASA has written to relevant Ministers including the former Prime Minister seeking clarification on behalf of industry on the rationale of what appeared to be a significant shift in the application of the importation provisions of the *Customs Act 1901* by Customs. Unfortunately, we have been unable to gain from Customs a clear understanding of this apparent policy shift.
- 5.13.6. The consequences of importing a vessel are significant. While there are matters directly related to Customs (such as duty payable), the greatest impost is that any crew member who is on a maritime crew visa (MCV) (the most commonly held visa for foreign maritime crew) will be required to leave the vessel or obtain a different work visa. Obtaining crew with Australian work rights has a cost impact on that vessel operator.
- 5.13.7. To alleviate this concern, operators can choose to "opt in" to the CT Act since Customs have stated that vessels operating on a TL will not be imported. However, a consequence of "opting in" is that the FW Act will apply (notably the payment of wages under Part B of the Seagoing Industry Award) to the vessel if it conducts 3 or more voyages within 12 months under the CT Act.
- 5.13.8. Under either scenario the cost of the crew on board increases, however the cost impost is likely to be greater when a ship is imported and the use of maritime crew visas not allowed.

5.14. Certainty of Regulation and Consistency of Regulation

- 5.14.1. The final comment under section five that the shipping industry requires certainty with respect application of national standards through consistency of regulation between international and inter/intra state trade touches on two threshold issues.
- 5.14.2. It is absolutely correct that certainty of regulation is required by the industry in order that the long term investments in a capital intensive industry such as shipping can be made.
- 5.14.3. However, it is entirely appropriate that regulatory regimes between domestic and international trade differ due to Australia’s jurisdictional limitations, international obligations and sovereign rights.
- 5.14.4. Many countries around the world recognise both the importance of having a strong and sustainable local shipping industry and the need to regulate access to coastal trade to ensure its long term viability. The various approaches to cabotage range from highly restrictive (US, Japan) to open and flexible (Australia, New Zealand)^{viii}. It is difficult to find a country or a region (in the case of the EU) with significant coastal trade that does not have some form of cabotage.
- 5.14.5. Comparisons can be drawn between maritime transport and aviation, which is potentially also subject to international competition and similarly has a cabotage regime.

5.15. Summary

- 5.15.1. To summarise, the actions/change of policy of Customs has created a situation for shipping companies engaged in intra-state trade to decide whether to continue to operate outside of the Commonwealth CT Act or elect to “opt in”.
- 5.15.2. Of these two options, “opting in” provides the opportunity to continue to operate with the existing crew on board and likely has a lower overall cost burden.
- 5.15.3. In doing so, however, it does open those voyages to be subject to contest by an Australian ship, if one is available and suitable, to undertake those voyages. The commercial uncertainty surrounding that element of the CT Act has been the cause of considerable concern.
- 5.15.4. It is therefore understandable that some ship operators would prefer that the Customs arrangements that were in existence prior to the July 2012 changes were still in place today – that they were not imported on intra-state trades and so were not attracted to

“opt in” to the CT Act and be subject to the cabotage provisions that exist therein. One way to achieve this may be to reintroduce the RUF system for Queensland intra-state trade as this may provide Customs with the assurance they need that the vessel is only in Australia temporarily.

5.16. Recommended changes to policy affecting coastal shipping

5.17. ASA advocates the following changes to Australian coastal shipping regulation:

5.18. Amendment to the CT Act as follows:

- reduce red tape by removing the five voyage minimum to apply for a temporary licence;
- streamline administration through express temporary licence/express variations; and
- general licences should be available to non-Australian flagged ships if Australian crewed.

5.19. Amendment to the FW Act as follows:

- Australian pay rates should not be imposed on Temporary Licence voyages.

5.20. Amendment to the Customs requirements as follows:

- new Customs regulation to provide for circumstances whereby importation is not in the ‘national interest’;
- Introduction of a timeframe during which vessels in Australia will not be imported (e.g. 90 days or some other timeframe); and
- removal of some key flow on effects from importation (such as immigration requirements) in some circumstances, such as dry docking.

5.21. A detailed discussion of these recommendations (and more), can be found in our submission to the Commonwealth Department of Infrastructure Options Paper: Approaches to Regulating Coastal Shipping in Australia.

6. Term of Reference 6: Benefits to Queensland from uniform regulation under existing Commonwealth legislation

6.1. As one of only two Australian States or Territories with a significant coastal shipping task, any differences between intra and inter-state regulation has a greater impact on Queensland than most other States.

- 6.2. Consistency in the treatment of coastal trading vessels between arrangements in Queensland and those that operate under Commonwealth legislation is both desirable and likely to provide a more productive and efficient industry, to the benefit of Queensland.
- 6.3. Consistency in the application of safety /environment/training standards of vessels of this size/type under the *Navigation Act 2012* is similarly advantageous in that owners and operators of such ships are familiar with the Australian Maritime Safety Authority as the regulator with responsibility for large ships. Consistency in approach and dealing with a regulator with core competency in this kind of ship regulation most certainly provides the optimum outcome for both Australia and the vessel owners/operators

ⁱ Sea Transport Efficiency and Greenhouse Gas Emissions, Australian Shipowners Association, 2005

ⁱⁱ Bureau of Infrastructure, Transport and Regional Economics (BITRE), 2014, Road deaths Australia, 2013 Statistical Summary BITRE, Canberra ACT.

ⁱⁱⁱ *Submission No. 50* to the Commonwealth Government Inquiry into Coastal Shipping, 2008

^{iv} Oxford Economics, “The economic impact of the UK Maritime Services Sector: Shipping”, Abbey House, 121 St Aldates Oxford, UK.

^v *ibid.*

^{vi} Lloyd’s List Australia, Daily Commercial News, Thursday July 10, 2014 No. 1036

^{vii} Cruise Down Under - Economic Impact Assessment of the Cruise Shipping Industry in Australia

^{viii} See International Transport Forum: Liberalisation in Maritime Transport, Mary R. Brooks