NSW Government response to Australian Productivity Commission draft report - Lifting productivity at Australia's container ports: between water, wharf and warehouse

The NSW Government welcomes the opportunity to provide feedback to the draft findings and requests for further information of the Inquiry being carried out by the Australian Productivity Commission and understands feedback provided will inform the Final Report. This submission outlines the NSW Government's responses to issues arising from the first round of consultation and Productivity Commission hearings.

General comment:

The report mentions SEPP Three Ports, which should now be updated to the Transport and Infrastructure SEPP, Chapter 5.

DRAFT RECOMMENDATIONS	
Draft recommendation 6.2 – Terminal access charges and other fixed fees for delivering or collecting a container from a terminal should be regulated so that they can only be charged to shipping lines and not to transport operators. Regulations should be established that prevent container terminal operators from charging transport operators any fixed fees associated with delivering or collecting a container. Container terminal operators would not be prevented from charging these fees to shipping lines. This reform should be complemented by state and territory government regulators being empowered to monitor flexible fees charged to transport operators by container terminal operators to ensure that these fees are being used to create efficient incentives for transport operators and are not being	The NSW Government appreciates the attention provided to the issue of stevedore charges, as detailed in the original NSW Government submission. The proposed approach may address the imbalance in bargaining power between stevedores and transport operators by proposing that terminal operators should only be able to levy fixed charges on shipping lines that can choose which terminal to use. One change is recommended to Draft recommendation 6.2, relating to the proposed role of the state and territory regulators. The recommendation that terminal access charges and other fixed fees should only be charged to shipping lines is noted; however, reconsideration of the proposal for state and territory government regulators to oversight flexible or incentive-based stevedore charges is requested as this is not considered feasible or effective. Most stevedores operate nationally and 'flexible fees' are applied across their terminals. There is also expected to be a direct correlation between fixed fees and flexible fees at each terminal. As such, it is strongly recommended that the regulation of these charges be undertaken nationally to ensure consistency and effectiveness of approach. Monitoring flexible fees charged to transport operators by terminal operators would also ensure these fees are being used to create efficient incentives for transport operators and are not being used to offset any lost revenue from fixed fees. As recognised in the PC Draft Report, the ACCC already performs roles in the maritime sector, including annual performance monitoring of stevedores and enforcement of the Competition and Consumer Act, including misuse of market power and unfair contracts provisions. Further, the Draft Report has recommended enhancement of these roles in the maritime sector by removing exemptions in favour of shipping lines (Draft Recommendation 6.3), while the Draft Report also notes that the ACCC supports further enhancement of unfair contract provisions (section 6.4 Use of contract terms in the maritime logistics system as a form of market power) which, if implemented, may provide for some further discipline on stevedore incentive charges. Given this approach, TfNSW considers any role in monitoring stevedore incentive charges would be a relatively minor and appropriate complement to existing ACCC roles as stevedoring charges are a national productivity issue as stevedores operate across multiple jurisdictions and the market

used to offset any lost revenue from fixed fees.	structure issues are common across jurisdictions. The proposed regulation should therefore be undertaken at the national level. The Independent Ports and Maritime Administration Act and Port Botany Landside Improvement Strategy (PBLIS) Review Options Paper canvassed the repeal of provisions in the NSW Ports and Maritime Administration Act providing for regulation of stevedore prices, except for some provisions covering remaining obligations on stevedores such as how stevedore storage charges are applied and to ensure VBS fees do not duplicate PBLIS penalties.
Draft recommendation 6.3 - Remove exemption for shipping contracts Shipping contracts should not be exempt from the unfair terms provisions in Australian Consumer Law. The Australian Government should remove this exemption.	Supported - It is noted that this recommendation will provide an opportunity to address issues raised by transport operators regarding terms and penalties related to container detention.
Draft recommendation 9.1 - Prohibit enterprise agreement content that imposes excessive constraints on productivity in the ports and costs on the supply chain The Australian Government should amend the Fair Work Act 2009 (Cth) to introduce a short list of unlawful terms in enterprise agreements in the ports. The list should aim to prohibit excessive constraints on: • merit-based hiring, promotion and training • the number of casual workers	The NSW Government supports improvements to workplace relations requirements that enhance port productivity and ensure disruptions to port operations are minimised.

and other workers with flexible rosters • strict rules determining the 'order of pick' • innovation and workplace change	
Draft recommendation 12.1 - Amend coastal shipping laws to increase competition. The Australian Government should amend coastal shipping laws to: • streamline the temporary licence system to increase operational flexibility and reduce the administrative burden on licence applicants • retain, but limit, the ability for Australian vessel operators to contest the granting of licences to foreign vessels • maintain the current application of the Fair Work Act 2009 (Cth) in coastal shipping • review conditions for Australian registration of vessels to encourage increased international competition.	Supported – As outlined in the previous NSW Government submission and provided in previous correspondence to the Australian Government: The NSW Government supports reforms to Australia's coastal trading requirements under the Coastal Trading (Revitalising Australian Shipping) Act 2012. The development of policy proposals by the Australian Government to reduce unnecessary regulatory and administrative requirements for the maritime freight industry and cruise sector is encouraged.
Information request 3.1 The Commission is seeking data on the productivity of labour within ports. Measures could include the average number of	Rail servicing information is publicly available on the TfNSW Open Data Hub and Online portal. Port Botany Rail Servicing Rate - (container lift rate for trains) is a measure of the number of container lifts (in and out) completed within an hour by the stevedores. It indicates how quickly a

20-foot equivalent units handled per person-shift, per employee or per hour worked. Ideally, the data would enable benchmarking across Australian ports or assessment of productivity trends over time.	train can be stripped and back-loaded depending on its size and load, and how efficiently forklift operations are being performed. To enable the calculation of this measure: Stevedores DP World, Patrick & Hutchison provide details of actual total monthly work time. Adding all three stevedores' total monthly rail lifts and dividing this by their total monthly work time gives average stevedore servicing rate. The Performance Standard is currently set at 36 Lifts Per Hour under the Ports and Maritime Administration Act. This attachment contains key Port Botany KPIs.
Information request 3.2 The Commission would appreciate data on container dwell times in Australian and international terminals or ports.	The PBLIS Comparison Study Landside Container Management completed by Advisian for the Independent Review of the Ports and Maritime Administration Act and Port Botany Landside Improvement Strategy includes dwell times for Fremantle and VICT ports in Australia and the international Port of Manila.
Information request 3.3 The Commission is seeking feedback on the costs and benefits of collecting and processing the richer data required to implement a comprehensive performance management framework.	The NSW Government supports the collection of data and development of a comprehensive performance management framework. Increased availability of information would support a detailed understanding of port operations for all stakeholders and future planning for port infrastructure development. Consistent performance information available across all operators would reduce any anticompetitive behaviour. Information could be made available as appropriate and individual data de-identified where possible. The effort to provide this information could be mitigated by using a Freight Community System that accesses existing ICT systems.

Insights into whether there would be any significant downsides to increased information availability, such as the possible facilitation of anticompetitive behaviour, would also be appreciated.	
Information request 3.4 The Commission is seeking feedback on its proposed methodology for benchmarking Australia's ports. Would it be feasible and useful? Would alternative approaches have greater merit? If benchmarking is considered useful, who should undertake it? And how often should it be undertaken?	The NSW Government supports the proposed methodology for benchmarking Australia's port performance.
Draft finding 3.6 - Each Australian container port has different strengths How well Australia's major container ports compare to their local peers depends on the performance metric considered. For example, in 2019 Melbourne moved more containers per hour than the other ports because it used more cranes per ship. Adelaide and Fremantle had the highest net crane rates — while they used fewer cranes on	Noted. The NSW Freight and Ports Plan 2018-2023 includes both government and industry initiatives that are currently being implemented to address bottlenecks and inefficiencies in container/freight movements. These include: • Botany Rail Duplication (to improve freight rail port access) • Gateway road development (road access to and from the port) • Moorebank Intermodal Terminal and associated infrastructure upgrades • Cabramatta Loop to ease rail congestion between Cabramatta and Liverpool.

average, they worked them harder. Sydney, Brisbane and Adelaide recorded longer anchorage and steam-in times — potentially indicating port congestion and/or port inefficiency. And Sydney underperformed on truck utilisation rates and turnaround times.	
Draft finding 3.7 - Australian container ports take longer to turn ships around than many international ports Australian ports do not compare well against international ports on measures of ship turnaround times. Their poor rankings in the World Bank's Container Port Performance Index reflect the fact that they take longer than many international ports to process ships (particularly medium to larger vessels — that is, those with a capacity of more than 5000 twenty-foot equivalent units). Slower turnaround times in Australia mainly reflect the use of fewer cranes to handle containers — Australian cranes are just as productive as those in the average international port.	Detailed information about the productivity of Australian Ports not currently held by the Australian or State Governments would be useful to understand how port productivity can be improved in future. ie. stevedore performance information that only those private businesses hold. The NSW Government has data on the stevedore landside performance at container terminals (stevedore interaction with trucks and trains) due to PBLIS, but not on the quayside, the interactions with vessels, and not for other bulk commodities like bulk liquids and coal.

Draft finding 7.2 - Most container ports are planning substantial investments in rail infrastructure Container port operators in Brisbane, Sydney, Melbourne and Fremantle plan to increase the share of freight travelling to and from those ports by rail over the coming decades. Any further government investment in rail to service container ports needs to be accompanied by a clear cost–benefit analysis, including analysis of the relevant externalities and including alternative scenarios for the development of truck technology, over the full economic life of the project.	The NSW Government has a strategic objective to separate the freight and passenger rail networks in the metropolitan area to continue to support the growing volume of freight to and from the port. It is important note that growing passenger demand, and the need to optimise the shared network to support this growth, is also a key factor in considering the need for a separated freight network. NSW is also progressing a number of policy and regulatory measure to optimise the utilisation of existing infrastructure. The Independent Review of the Ports and Maritime Administration Act and Port Botany Landside Improvement Strategy led by Mr Ed Willett has addressed rail current initiatives in the Options Paper released in June 2022 (page 71 and 72). Current initiatives While the coordination problems are significant, a number of initiatives, decisions, and processes are under way that may increase rail efficiency at the port by providing new incentives for improved coordination, inside and outside the port gate. These initiatives are a mix of actions by government and industry, and include: Initiatives 'inside' the port gate • NSW Ports' $120 million investment in 'on-dock' rail capacity at Patrick's terminal across the next four years • Patrick Terminals' $70 million investment in operating equipment and systems • NSW Ports plans to subsequently invest in 'on-dock' rail at the other two stevedores with the aim that all three stevedores will have capacity for one million TEU per year. Initiatives 'outside' the port gate • Duplication of the Port Botany rail line by the Australian Government, which is expected to increase capacity for freight movement on the Botany Line from the current average of about 20 trains per day (per direction) up to about 45 trains per day (per direction) by 2030.

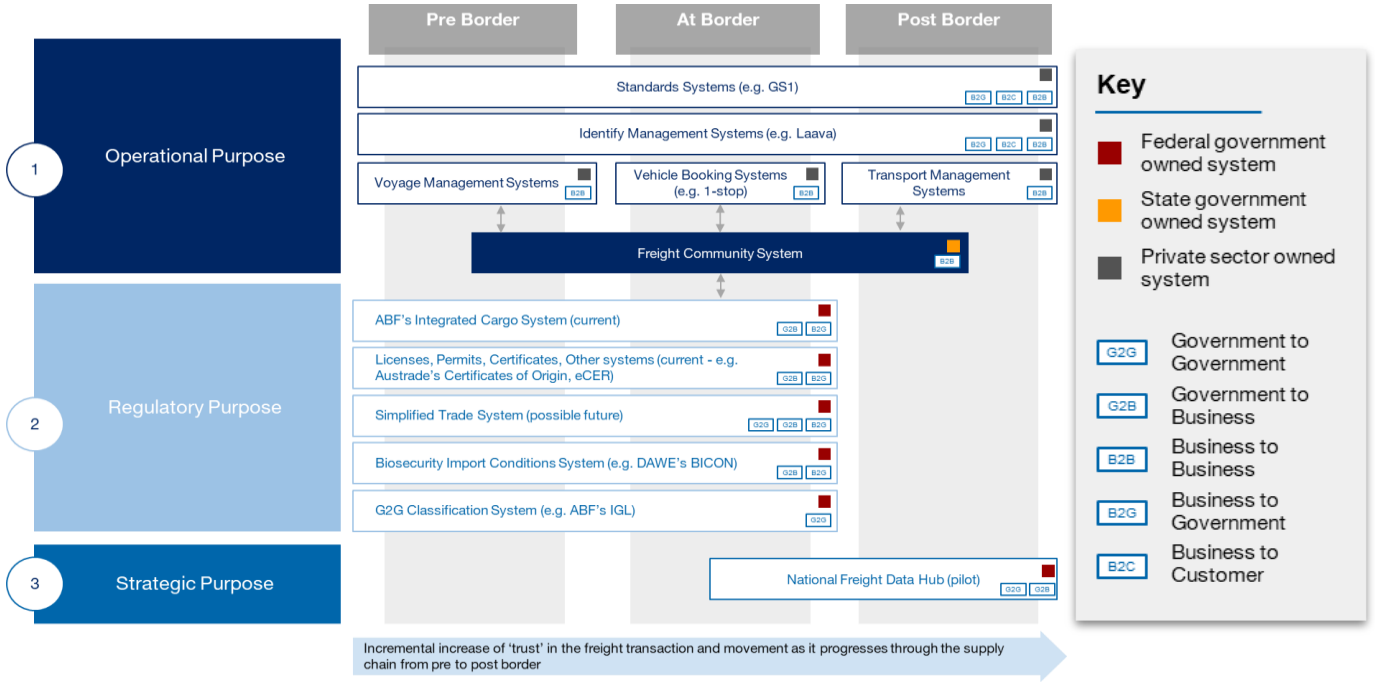
	• The development of a 'Freight Level of Service' by Transport for NSW to provide a clearer specification of port rail service needs, and for this to be reflected in both Transport's development of the Standard Working Timetable (SWTT), and through its service contract with Sydney Train's network.
	• A greater recognition by the NSW and Australian Governments for ARTC's operations in NSW should improve regional and port movements, and be subject to new requirements that include:
	  ○ New enforceable network performance outcomes, including network standards
	  ○ Effective reporting mechanisms on asset and operational issues
	  ○ Appropriate governance arrangements to ensure coordination of performance
	  ○ Sharing of data to facilitate operational performance outcomes.
	
	These investments and processes, if effectively leveraged off each other, should result in a more coordinated, integrated, and appealing freight rail service offering to the market. While the supply chain may continue to have high levels of vertical separation, the benefits of a more vertically integrated supply chain (for example, increased command and control) can possibly be simulated though commercial (contractual) agreements between supply chain participants, without the need for government intervention.
	
	Regulatory intervention by government may be premature while these initiatives, agreements and infrastructure are being implemented. Consistent with the Better Regulation Principles, a regulatory intervention should only be pursued after non-regulatory, market-based, commercial or cooperative approaches have been provided a reasonable opportunity to work. In line with these principles, there is an additional condition under the Act that before any government intervention in the operation of services and facilities in the port related supply chain, the Minister must be satisfied that such action will promote economic efficiency and not constrain the private port operator functions.
	
	A PBLIS style government intervention in port rail management is therefore not recommended at this time.

	However, once industry investments mature, if the right environment for industry-led solutions is still not there, government retains the ability to intervene in the market (via the Act) with regulatory approaches. These options are consistent with the Better Regulation Principles to encourage industry-led approaches to market problems.
Information request 8.1 In addition to container ports and towage services, are there other sectors in Australian ports where workplace relations issues affect the efficiency or productivity of operations? For example, bulk ports, empty container park operations or pilot services.	Stakeholders have not raised issues with workplace relations issues outside of container terminals in recent consultation processes undertaken by TfNSW and as part of the Independent Review of the Ports and Maritime Administration Act and the Port Botany Landside Improvement Strategy.
Information request 10.3 What are the costs and benefits of formalising qualifications and licensing for heavy equipment that is unique to ports? Are there health and safety grounds for doing so?	Formalising qualifications would facilitate the recognition of capabilities both nationally and internationally. In addition, it could also facilitate the formal introduction of traineeship programs (for entry level roles) that could support the reduction of overall costs via varied government incentives and or initiatives. As qualifications are governed nationally, they are consistently upgraded as a matter of process to ensure currency, validity and encompass emerging technology. This allows for clear insights into upskilling requirements, cross skilling requirements and re-occurring training needs, therefore ensuring all staff are current with their respective skills when workplace change occurs.
Information request 10.5 How does workplace relations influence training, including the content of training, who provides the training, who is trained and when they are trained in the maritime logistics system?	In NSW the Port Authority (state owned corporation) employs and trains all marine pilots. It is a condition of the Marine Safety Act that the holder of a marine pilot's licence must satisfactorily complete any training as required by the NSW Marine Pilotage Code. The NSW Marine Pilotage Code requires applicants for a marine pilot's licence to successfully complete initial training before a licence is issued. Thereafter all licenced marine pilots are required to maintain standards and improve proficiency through ongoing periodic training. Training is

	provided in-house by check pilots from the Port Authority, the use of ship simulators at the Australian Maritime College in Launceston and manned models at Port Ash in NSW. The content of the training is determined by the relevant port's Pilot Training Committee and the external training institutions. NSW Marine Pilotage Code https://www.transport.nsw.gov.au/operations/logistics-network/nsw-port-network/marine-pilotage-code
Information request 10.6 Would greater use of merit-based hiring and promotion in container terminal operations result in greater labour mobility? Would recognition of prior learning, mutual recognition of occupational licencing and/or use of accredited training need to be expanded if there was a greater reliance on merit-based promotion systems? Which occupational licences used in the ports are not mutually recognised across all states and territories? What are the costs to businesses and firms from these arrangements? Is there more labour mobility in bulk and general stevedoring compared to container stevedoring? Are there more standard qualifications for bulk	Merit-based hiring and promotion could directly align to defined training pathways (Refer to 10.3 also) resulting in greater labour mobility. NSW is facing the issue aligned to workforce mobility outlined on Page 29 of the draft report overview ('Skills and training raise few productivity concerns'). The key driver contributing to this relates to the definition and management of Skills (i.e. skills are not defined and or aligned to a national standard therefore resulting in the inability to recognise previously gained and or learnt skills). To support workplace mobility and productivity, a suggestion is (for activities and tasks that do not currently align to national standards) to conduct an internal review to define the skills and capability required to be performed, align these to industry standards (Units of Competency and or Qualifications). This would allow for a consistent and national approach in recognising and supporting workplace mobility. This can occur in parallel to addressing the workplace relations recommendations. This investment in time and research can help to further identify the areas where aligning skills and capabilities to industry standards is warranted and financially viable. The reality for most organisations today is that upskilling or reskilling to accommodate future changes from automation, technology and/or new processes will be required. The opportunity is to ensure suitable focus is placed on transferrable skills that are required to learn, apply, critically think, communicate, analyse etc. that will remain constant. Skill shortages are common across specific technical environments and quite often difficult to address as training requirements rely heavily on infrastructure. There could be a recommendation aligning with the VET framework that supports effective recognition of national or international candidates to support the training pathways to minimise unnecessary training. Further to this there is an opportunity to consider digital technologies to remove the reliance on a strategic fleet. This approach could facilitate a flexibility in training delivery and leverage a Domestic Traineeship

equipment operators that foster mobility?	program to support the volume of staff required to meet the workforce planning requirements without the reliance on the strategic fleet. If the VET approach is adopted this would ensure ongoing sustainability through continuous maintenance, updates and improvements of the training needs (via skills councils) while also considering emerging technologies.
Draft finding 11.1 - Technology use at Australia's major container ports is in line with international practice There is no 'best' level of automation and ICT adoption for container terminal productivity and Australia's major container terminals have implemented varying degrees of both automation and ICT adoption, in line with internationally comparable ports. However, automation can lead to a range of benefits including improved safety, reliability and consistency of terminal operations.	Noted; however, productivity benefits could potentially be realised through improvements to technology use across the container supply chain with greater sharing of information between container terminals and other supply chain operators, for example empty container parks.
Draft finding 11.2 - There is no case for a government-run port community system Australia's maritime sector relies on a combination of private ICT systems that facilitate the sharing of documents and allow cargo to	**Freight Community System** A Freight Community System (FCS) is an electronic platform that enables freight network supply chain businesses to exchange information rapidly and securely with other businesses through a common interface, facilitating commercial interactions. These systems are typically neutral and open electronic platforms that are independent of established supply chain interests to enable trusted, end-to-end visibility of the supply chain, supported by appropriate governance, regulatory and funding arrangements.

flow efficiently through the maritime logistics chain. These systems continue to be developed through the adoption of new technologies that increase their safety and usability. Implementing a government-run port community system would risk simply adding further administrative costs for users in the maritime ICT landscape without corresponding benefits. The Australian Government should continue to work towards ensuring that its customs and biosecurity systems can seamlessly interface with private port community systems.	An FCS would improve trusted data sharing, exchange and storage for freight movements in NSW, facilitating the operational movement of freight. This world leading capability would provide the trusted digital infrastructure backbone to existing hard infrastructure assets and incremental future investments and enable industry collaboration to optimise freight movements in Australia. Individual operators retain their own internal IT systems and programs that are connected to the FCS which is an overarching IT system; there is no duplication of administrative effort to provide data within the FCS. The FCS provides relevant information to users that they are authorised to access. Users can log in to the FCS to access all the information they require in one IT location. This removes the need for users to log in to multiple systems and replaces the need for email, phone and other communication methods. While private entities in the port supply chain use a variety of private and/or propriety ICT systems to facilitate port operations and some sharing of documents to allow cargo to flow efficiently, for example through vehicle booking systems, none of these provide the range or scope of benefits that could be accrued through a comprehensive FCS. Government is likely required to implement a FCS because: • Government is the only entity that has reach across the freight supply chain and can interconnect all freight modes, thus enabling benefits to be accrued to the whole supply chain. Government will play a neutral role, with no commercial imperative, in overseeing appropriate management of sensitive data. It would be difficult for the private sector to gain the trust of the supply chain and provide an industry wide solution. • A national FCS is desired by the supply chain. Co-operation between jurisdictions could support a national FCS with an interoperable and scalable NSW Government developed FCS used as a model for other jurisdictions. **The Australian Freight Technology Landscape**



The figure above shows how a FCS could fit within the context of the other existing systems across the import and export freight supply chains. Ensuring the FCS is complementary to existing initiatives is important. The FCS would meet the operational and business needs and include transactions that are business-to-business (B2B) and business-to-consumer (B2C). Private sector systems such as voyage management systems, vehicle booking systems, transport management systems and standard systems could push and pull messages to the FCS. Additionally, public sector systems such as the Integrated Cargo System, LPCO systems, the Simplified Trade System and BICON could also send and receive messages to the FCS, for business-to-government (B2G) regulatory and reporting purposes.

TfNSW consulted with the supply chain regarding system functionality (use cases) during the development of its FCS strategic business case to ensure there was no duplication with existing systems. Concerns were raised about poor cargo visibility and transparency, and a lack of insight

	analytics to support better planning and freight logistics optimisation. Addressing these gaps was particularly valued by stakeholders. Functions such as booking and instruction, commonly viewed as duplicative to available existing systems were regarded as lower priority functions. **(1) TfNSW Independent Review of the Ports and Maritime Administration Act 1995 & Port Botany Landside Improvement Strategy, Options Paper, June 2022.** Option B13 in the Options Paper is to - Progress development of FCS Strategic Business Case and if positive, develop a phased implementation plan and proceed as a high priority. Details may be found on the review website PAMA review | Your Say Transport for NSW **(2) NSW Freight Community System** In 2019, TfNSW commissioned an initial scoping study to explore the feasibility of a Port Community System (PCS) for NSW and enhance data exchange between sea freight businesses. While significant benefits were identified that could be realised for the port sector alone, the scoping study highlighted that the freight supply chain is interconnected and encompasses road, rail, air and intermodal terminals. TfNSW, along with consistent feedback from government and industry stakeholders, recognised that developing a PCS in isolation to other modes could miss significant opportunities to improve the efficiency of freight overall. The need for a system to integrate with other government elements as well as interstate movements was also recognised. It was for these reasons that the PCS initiative was expanded to a FCS. Consultation with industry and government in 2021 to support the development of the Strategic Business Case for a FCS confirmed that data sharing between NSW freight businesses faced various issues. Addressing these issues could support the efficient functioning of the NSW supply chain and reduce the costs of doing business. These issues include: • Complex, manual and duplicative business to business freight processes: Freight sector processes used to generate and record business to business transaction data are low-tech and manual for many freight businesses. These processes are slow and often duplicated, leading to inefficiencies, risk of error and adding additional costs to trade which can undermine international competitiveness.

	• Lack of common data standards and methods for exchanging commercial freight data: There is no standard language for communication between parties in the supply chain network, resulting in inefficiencies from the interpretation of different data formats. There is also no commonly accepted method for exchanging freight data, which is passed across various modes, such as emails and phone-calls, necessitating ongoing monitoring and increasing the potential for errors. • Competing freight sector interests and information asymmetries: Businesses have developed systems and processes to serve their own activities. Consequently, data tends to sit in commercial silos and inefficiencies, including information asymmetries, are common and in some instances are used for commercial gain. This is an issue for government as the lack of visibility within the supply chain impedes the identification of bottlenecks in the network. • Current freight business technology systems vary in maturity: The variation in maturity and sophistication of systems has resulted in a range of incompatible functionalities and capabilities. This makes strategic planning difficult as data is not always accessible or in a coordinated, usable format. **NSW FCS Strategic Business Case** Transport for NSW has developed a Strategic Business Case for a proposed FCS, which is currently being reviewed. The project is aligned with direct actions outlined in the NSW Freight and Ports Plan 2018-23, the Future Transport Technology Roadmap and the State Infrastructure Strategy. It supports the NSW Government's vision to be a global transport technology leader and create world-class mobility solutions for the people and communities of NSW. The FCS would incorporate air, road, rail and sea supply chain networks, increasing productivity and efficiency across multiple intermodal points. It would aim to solve operational problems and visibility issues for freight supply chain operators throughout a product's entire journey.

	During 2021, TfNSW consulted with stakeholders across the supply chains of air, road, rail and sea as well as the other jurisdictions and Australian Government to identify problems, benefits, technology and governance solutions to inform a Strategic Business Case for the project. The feedback and submissions received have helped shape the Strategic Business Case for a FCS in NSW. The Strategic Business Case is currently being reviewed and evaluated in accordance with NSW Government guidelines and the NSW Gateway Policy that mandates independent peer reviews at critical decision points in a project's life cycle. Following the completion of the review the next step for the project will be determined (TfNSW 2021, Freight Community System, www.transport.nsw.gov.au/projects/current-projects/freight-community-system) **Benefits** - Lower costs of goods for consumers and higher returns for exporters as efficiency gains delivered in national container supply chains are shared with customers. This is achieved through reduced data entry and errors, simplified back-office processes and automating processes, allowing more effective fleet (vessels, trucks and locomotives) operations. - Increased visibility of cargo information and status. - Reduced communication effort between supply chain participants as communication channels are centralised and as a result are more efficient **Challenges** - A complex system of this scale and scope is likely to require a long lead time to deliver with significant costs to develop and maintain. It is therefore important to ensure that if the decision is to proceed with a FCS, it can be delivered in phases. Industry involvement in the final design of a FCS will be important to ensure that the benefits realised match industry expectations. - There is a significant number of small, medium and large supply chain operators that all use data for different purposes. Change management will be crucial to bring together Government and supply chain operators to achieve mutually beneficial outcomes and ensure supply chain participation. - It is recognised that supply chains do not only work within the confines of NSW. It is for this reason that a FCS will need to be scalable and interoperable with other jurisdictions and it is critical for the NSW and Australian Government to work together with key stakeholders to fix both the business to business and business to government issues.

	- The data standards that are used in the NSW FCS need to be widely acceptable, implementable and applicable for users in other jurisdictions. **(3) Advisian PBLIS Comparison Study - overseas examples of FCS** In a report commissioned by TfNSW for the Review of the Ports and Maritime Administration Act 1995 & Port Botany Landside Improvement Strategy, Advisian (Advisian PBLIS Comparison Study, 2022 Sydney, NSW), in relation to Port Community Systems overseas, found that: - All the European ports investigated had a Port Community System (PCS). The services offered depends on the engagement from stakeholders and the integrations to the platform. Some services may be accessed through the PCS or separately. The PCS is primarily used for the exchange of information between all parties within the port supply chain. The availability of real-time information about container status and congestion levels (Valencia) has improved the ability of [road] carriers to plan trips to the port. Only the Port of Rotterdam and the Port of Valencia had their respective [truck] booking systems integrated into the PCS. Sharing information through the PCS allows the maximum reuse of information and has reduced the number of communications required among stakeholders by providing a single location for all documentation including to the Harbour Master and Customs." - Ports in Europe investigated in this study included Port of Valencia (3 terminals and 5.4 million TEU per annum), Port of Rotterdam (5 terminals and 14.3 million TEU per annum) and the Port of Antwerp (5 terminals and 12 million TEU per annum). For comparison Port Botany has 3 terminals and 2.5 million TEU per annum. - Port of Valencia example - The Advisian Report advises that the Port Community System at the Port of Valencia was developed by the port operator to provide a technological platform to streamline and facilitate the operating processes in the port community. It noted, "any company can participate in the development and implementation of services. Propriety systems can be integrated with the platform." For road carriers it is used for planning port arrivals. In the PCS application the driver registers the data for their visit to the port to find out if there are any delays at the terminal. A real time connection to cameras available at the port is also provided so they can estimate the level of congestion on the roads outside and inside the port. Other services of the PCS include:

	- Port Operations – A single location for all documentation required by the PAV itself and other official bodies such as the Harbourmaster's office and Customs. - Inland Transport – Enables agents involved in the road transport of goods to compile and manage transport orders including cargo acceptance and delivery orders required to transport goods inside the port premises. The platform also provides agents with notifications of the delivery and receipt of containers at the terminal or depot. - Customs – Allows shipping agents to present and amend import and export cargo manifests directly to the PAV and the Spanish State Tax Agency. - Track and Trace – The Cargo Tracking service allows users to obtain track and trace information of their shipments, such as the status of their cargo, transhipments carried out and/or documents processed. The platform also enables users to integrate this information into their systems to present it to their customers. - Integration – Companies handling large volumes of shipping documents prefer to transmit the corresponding data through a direct integration of their management systems, saving the time needed to copy and reintroduce the data in their systems. Development of the PCS is undertaken to continue to integrate with third party systems. Some future improvements to the PCS at Port of Valencia are: - An alert system in the PSC application - At present, the application does not allow for instant notification of incidents. Currently, communications to stakeholders involved in port activities are made by email and in some cases by WhatsApp groups. An instant alert system would allow drivers to be informed of any problems and/or delays in real time. The system has been developed and is about to be implemented. - VBS - The working groups are analysing and discussing the failures that led to the rejection of the system in the first implementation attempt. The aim is to improve the previous version and to re-propose a VBS in the medium term. https://yoursay.transport.nsw.gov.au/71336/widgets/347470/documents/233611

Draft finding 11.3 - Government should continue to overhaul cargo clearance systems The Australian Government's cargo and vessel clearance systems are currently convoluted and challenging for stakeholders to use, with repetition in data entry and outdated ICT systems. A government taskforce is working to address these issues. Successful reform will require the elimination of duplicative application processes, adequate resourcing for the departments performing clearances and a stable 'single window' ICT platform that can integrate with privately operated port community systems	The draft report and recommendations have not considered in detail the broader economic impacts arising from weaknesses in Australian's cargo and vessel clearance systems and the increasing biosecurity threats of exotic pests and diseases entering Australia's shores. The Australian Government should continue to overhaul cargo clearance systems and consideration should also be given to measures to mitigate biosecurity threats of exotic pests and diseases.