

20/11/2023

Dear Members of the Joint Standing Committee on Treaties,

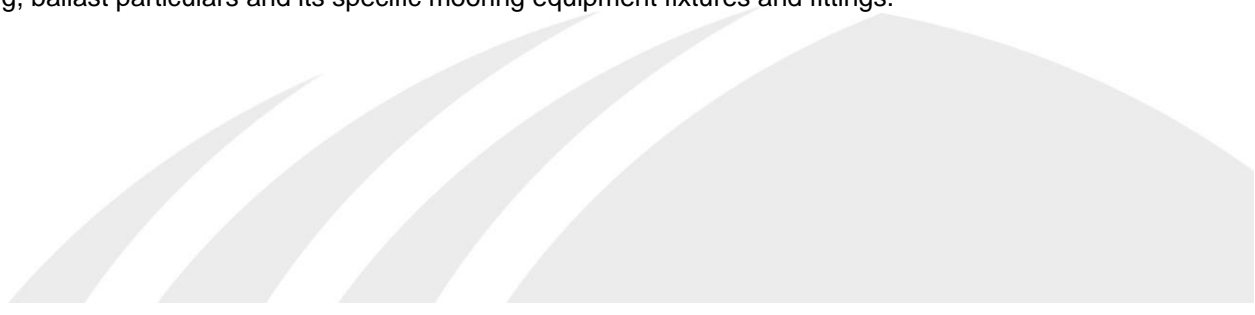
I respectfully contact you in relation to the proposed amendments to the Annex of the Convention on Facilitation of International Marine Traffic, 1965. In particular with reference to the scope of the Maritime Single Window which, with minor changes, can potentially support broader port and terminal industry requirements, enhancing safe and efficient operations, reducing workload and bureaucracy whilst supporting enhanced future interoperability.

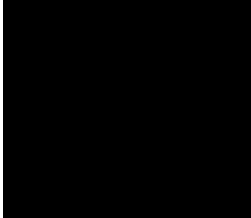
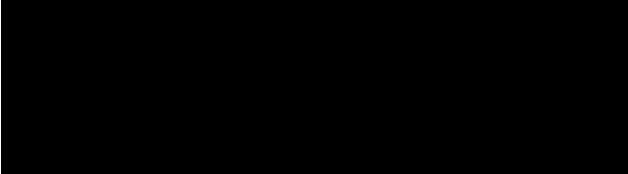
My role is as the Shipping Superintendent for [REDACTED]. I have had prior extensive experience operating within the maritime sector both in roles at sea as a navigational officer trading internationally in the Merchant Fleet and for eighteen years in the Commonwealth Government within the Response division of the Australian Maritime Safety Authority. This provides me with good insight from the shipboard, regulatory, emergency response and port operations perspective.

[REDACTED] is situated at the [REDACTED]. The terminal operates around the clock with a name-plate capacity of 85 million tonnes per annum, exporting coal from [REDACTED] mines to ports around the world and is a significant contributor to the Australian economy. Coal exported from the terminal is primarily high-quality metallurgical coal, a vital component in steel making and as such a critical resource required for the transition of the global economy to a sustainable footing. The terminal is a common user facility, owned by the Queensland State Government and leased to [REDACTED] on a 50-year lease, with a 49-year option, to operate, maintain and develop the terminal. [REDACTED] has engaged [REDACTED] to operate and maintain the terminal on its behalf.

[REDACTED] values safety as keystone of our operations, an important underpinning pillar of this is vessel vetting.


Vessel vetting requires the collation of extensive vessel information and assessment of the information against terminal requirements. This includes but is not limited to information which is both static and dynamic in nature related to the vessel's identity and class, certification status, dimensions, capacities, cargo loading, ballast particulars and its specific mooring equipment fixtures and fittings.





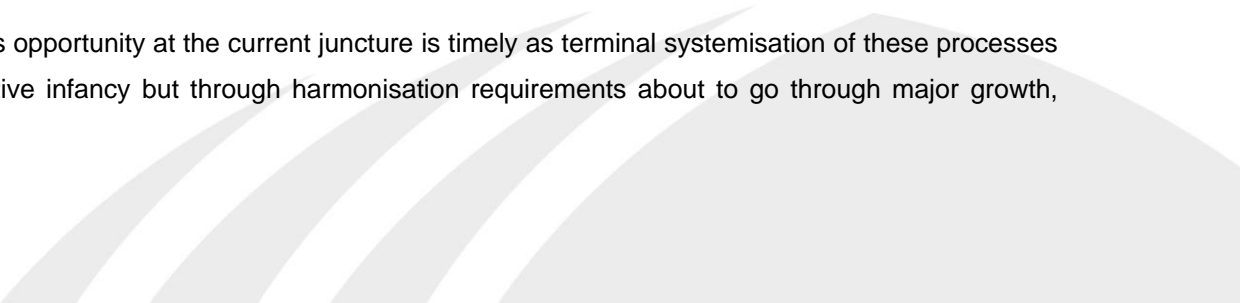
Additionally, terminals on completion of loading operations capture information in relation to vessel performance and instigate reviews of adverse events or incidents that have occurred during that port call. Some of this detailed information, considered more minor in nature, is currently not captured external to the terminal or independent commercial vetting platforms, there is potential that this information could be better collated to identify trends and be used as a lead indicator in relation to safe vessel operations to better target Port State Control authorities' efforts to enhance maritime safety.



A solution which provides the ability for vessel owners and operators to upload digitalised information in standard file formats such as ship general arrangement and mooring plans, fire-fighting equipment or life-saving appliance plans could allow for critical data to be available to relevant stakeholders during vetting, berthing pre-planning, pilotage and loading operations as well as providing the ability for response agencies to access critical safety & voyage information in relation to a maritime emergency is highly desirable.

 is active in a number of maritime industry forums, this includes the Australian Coal Terminal Operators Network (ACTON) and the Association of Resource Companies, Ship Operators, Ports and Terminals (ARCSOPT). Both groups have highlighted the importance of streamlining vessel vetting processes from a terminal, ports and shipping company perspective. The current workload associated with collation and submission of data for ship operators across multiple ports and terminals, each with slightly different formats and criteria is both high and repetitive, this is not dissimilar to the current issues faced with government reporting requirements that the Maritime Single Window seeks to address. Reduction of this workload by entering the information once and using multiple times has the potential to reduce fatigue for seafarers and enhance maritime safety within Australia whilst increasing efficiency and streamlining processes. Standardised data formats will also key in modernising and automating processes and workflows to support future machine-learning and AI applications.


The ARCSOPT Terminal Working Group has carried out a body of work in relation to the harmonisation of vetting requirements across Australian ports and terminals. Much of the information required for vetting is already covered by the datasets stipulated within the IMO Compendium on Facilitation and Electronic Business likely a core consideration in the development of the Maritime Single Window. There is real opportunity in developing the datasets beyond the IMO requirements to include terminal and port specific requirements, this provides Australia with a potential opportunity to drive standards and positively influence global shipping and trade.


Grasping this opportunity at the current juncture is timely as terminal systemisation of these processes is in its relative infancy but through harmonisation requirements about to go through major growth,





providing industry with a platform to allow efficient and secure data exchange will best mitigate against the risks of a longer-term vacuum in standards with multiple solutions being developed without strategic oversight to address industry needs as a result. The provision of a platform which provides two-way communications and is embedded into industry processes will ensure that the most cohesive database of information will be available to Government whilst ensuring industry has access to the appropriate level of information required to discharge safe and efficient port and terminal operations. Government control and hosting of the data can also ensure that high standards from a cyber-security perspective are maintained, this is an important to ensure protection and integrity of information and maintain trust within international trade stakeholders and partners.

 has participated in one of the consultation sessions run by the Department of Infrastructure in regards the Maritime Single Window and we would be keen to actively participate in future working groups to shape the scope of the maritime single window to meet terminal and port operator needs.

I would like to express my thanks on behalf of  for this opportunity to provide input into the proposed amendments to the Annex of the Convention on Facilitation of International Marine Traffic, 1965 and in particular the scope for the Maritime Single Window development and implementation.

Yours faithfully

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Shipping Superintendent

