



Shipping Australia Limited
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20 October 2011

Jeanette Radcliffe
The Committee Secretary
Senate Rural Affairs and Transport Legislation Committee
PO Box 6100
Parliament House
Canberra ACT 2600

rat.sen@aph.gov.au

Dear Ms Radcliffe,

Enquiry into the Quarantine Amendment (Disallowing Permits) Bill 2011

Shipping Australia is a peak industry association with its 39 members involved in over 80% of Australia's container and car trade and over 50% of our break-bulk and bulk trades. We very much appreciate the invitation to comment on the above bill and have attached a copy of our membership list.

We are party to the submission by the Industry Working Group on Quarantine and our members strongly support the comments in that submission.

In particular, we believe "the Bill under reference would take Parliament beyond its role of setting the framework by way of a proper legislative function, and insert the Parliament into the detailed administrative and operational application of policy. Parliament would be assessing the merits of particular cases that attach to each permit application."

We believe this Bill is totally impracticable given that in the 2010/11 financial year, some 22,303 permit applications were lodged with 19,054 or approximately 85% granted.

In Shipping Australia's view this Bill clearly indicates that Parliament does not have any confidence that the Australian Quarantine and Inspection Service can carry out its role in terms of granting

import permits and would deliver a clear signal to industry that they should also question their confidence in the ability of AQIS to carry out the tasks set under legislation approved by Parliament.

One particular issue that is of concern to shipping, is the import permits that have been granted for prohibited food imports that are used by cruise shipping lines under strict conditions prior to loading onto cruise ships. Given that cruise shipping is the fastest growing industry in Australia, this particular import permit is of paramount importance in facilitating what other countries provide to the international cruise industry and to facilitating tourism.

We would be available to elaborate, not only on any of the issues raised above but also the detailed comments contained in the IWGQ submission or any other questions that the Committee would like to address to Shipping Australia.

Yours sincerely

Llew Russell AM
Chief Executive Officer



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Shipping Australia Full Membership Shipping Lines

ANL Container Line Pty Ltd	www.anl.com.au
APL Lines (Australia)	www.apl.com
Asiaworld Shipping Services Pty Ltd	www.asiaworld.com.au
Austral Asia Line Pte Ltd	www.australasialine.com
CMA CGM	www.cma-cgm.com
Evergreen Marine Australia Pty Ltd	www.evergreen-marine.com
Five Star Shipping & Agency Co Pty Ltd	www.cosco.com.au
Goodman Fielder	www.goodmanfielder.com.au
Gulf Agency Company (Australia) Pty Ltd	www.gacworld.com
Hamburg Sud Australia Pty Ltd	www.hamburgsud.com
Hapag-Lloyd Australia Pty Ltd	www.hapag-lloyd.com
Hetherington Kingsbury Shipping Agency	www.hksa.com.au
Hyundai Merchant Marine	www.hmm21.com
Inchcape Shipping Services	www.iss-shipping.com
"K" Line (Australia) Pty Ltd	www.k-line.com
LBH Australia Pty Ltd	
Maersk Australia Pty Ltd	www.maerskline.com
Mediterranean Shipping Co (Aust) Pty Ltd	www.mscaustralia.com
MISC Agencies (Australia) Pty Ltd	www.miscaust.com.au
Mitsui OSK Lines (Australia) Pty Ltd	www.mol.co.jp
Monson Agencies Australia Pty Ltd	www.monson.com.au
NYK Line (Australia) Pty Ltd	www.nyk.com
OOCL (Australia) Pty Ltd	www.oocl.com
Pacific Asia Express Pty Ltd	www.pilship.com
PB Towage	
Quay Shipping Australia Pty Ltd	www.quay-shipping.com
RCL (Australia) Pty Ltd	www.rclgroup.com
Royal Caribbean International	www.royalcaribbean.com
Seaway Agencies Pty Ltd	www.seaway.com.au
Ship Agency Services Pty Ltd	www.shipagency.com.au
Svitzer Australia Pty Ltd	www.svitzer.com
The China Navigation Company Pte Ltd	www.swire.com.au
Wallenius Wilhelmsen Logistics	www.2wglobal.com
Wilhelmsen Ships Service	www.wilhelmsen.com

Contributing Members

China Shipping Container Liner Co. Ltd

Hanjin Shipping

Hyundai Merchant Marine

Neptune Shipping Line Pty Ltd

Pacific Forum Line (NZ) Ltd