



15 September, 2015

WWF-Australia submission

Rural and Regional Affairs and Transport References Committee

An Inquiry into Increasing use of so-called Flag of Convenience shipping in Australia

WWF-Australia has a long term commitment to protecting and ensuring the sustainable use of Australia's marine environment. Thus, we welcome the opportunity to make this short submission to the Senate inquiry into the increasing use of so-called flag of convenience shipping in Australia.

Australia's shipping lanes transit, or are adjacent to, areas of high environmental values as well as areas that are difficult to navigate and often with very adverse weather conditions. This combination of high environmental values and high risk operating conditions means that we need good operational standards to minimise shipping risks.

Thus, while recognising the importance of shipping to the economy and well-being of Australia, WWF-Australia always advocates the highest standards of operation for shipping in Australian waters. Key aspects of acceptable environmental standards for shipping include a range of measures starting with the seaworthiness of ships and the seamanship of crews through to compulsory pilotage, adequate navigational aids such as electronic charts and vessel management systems, and adequate portside waste reception facilities. All these measures must be supported by an effective regulatory, compliance and enforcement regime such as the port state control measures undertaken by inspectors from the Australian Maritime Safety Authority.

Consequently, WWF-Australia has major concerns if the proposed reforms to coastal shipping lessen to any degree existing environmental management standards. While Australia's reputation within the International Maritime Organisation (IMO) is good, particularly in relation to the measures implemented in the Great Barrier Reef (GBR) and Torres Strait Particularly Sensitive Sea Area, we recommend a number of additional improvements to minimise the risk from shipping to the Reef including:

- prohibiting "rogue" ships from entering the GBR Region,
- improvements in the management of anchorages,
- improved marine biosecurity measures,
- introduction of vessel arrival systems at Gladstone and Hay Point (major bulk export ports),
- ongoing improvements in Reef Vessel Tracking Systems,

- extending coverage of Reef pilotage,
- limiting ship movements to major Reef passages and shipping lanes, and
- improvements in ship navigation aids, and crew and operational safety measures.

While currently proposed for the Great Barrier Reef region, we consider that this level of management should be progressively rolled-out around the Australian coastline starting with other areas of high environmental values.

Recent experiences with foreign flagged ships indicate a range of existing problems that can impact on the operational standards of shipping. These include limited knowledge of English which results in poor communications between Australian authorities and ship masters and limited understanding of the regulatory requirements for shipping in Australian waters; no access to recent electronic charts that are regularly updated; and limited, to no experience with Australian coastal conditions thus increasing the risk of navigational areas resulting in groundings or other shipping incidents. These risks are likely to be increased given the projected increase in shipping numbers around the country over the coming decades.

We note that the IMO has moved from voluntary to mandatory flag State audits which should result in improvements in overall standards on the international fleet. However the risks associated with limited local knowledge will remain. The only reliable approach to manage this risk is to require pilotage by local, appropriately trained pilots (see recommendations for extending pilotage in GBR waters in 2013 Det Norske Veritas Report on North East Shipping Risk Assessment http://www.amsa.gov.au/community/consultation/documents/North-East-Risk-Assessment-Report_DNV.pdf)

WWF-Australia remains concerned by the proposed changes to coastal shipping arrangements because of the likelihood of increasing the risk of shipping incidents and associated environmental impacts. We recommend that comprehensive risk assessment and cost benefit analysis is undertaken prior to any decision to commence with the proposed changes.

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