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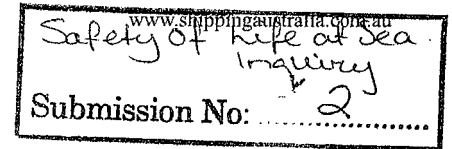
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21 August 2003

RECEIVED
23 AUG 2003

Ms Gillian Gould
Committee Secretary, Joint Standing Committee on Treaties
Parliament House
CANBERRA ACT 2600

BY: *Gillian Gould*



Dear Ms Gould

SAFETY OF LIFE AT SEA CONVENTION

Thank you for your letter of 30 July, 2003 seeking the views of Shipping Australia on the following proposed treaty action:

- *Amendments to the Annex to the International Convention for the Safety of Life at Sea, 1974, including consideration and adoption of the International Ship and Port Facility Security (ISPS) Code, done at London on 12 December 2002.*

Shipping Australia appreciates the opportunity to comment and at Attachment A is a list of our member shipping lines and shipping agents which cover all types of shipping trading to and from Australia. Being representative of a broad section of the industry, SAL is concerned with the proposals to enhance maritime security.

The Maritime Transport Committee of the OECD (MTC (2003) 47) has estimated that the cost to the world-wide maritime industry of conforming with the ISPS Code will be approximately \$USD1.3billion in the first year of its operation and approximately \$USD750million for each year thereafter as a result of the need for development and implementation of ship security plans, training of company security officers as well as onboard crews, installation of the Automatic Identification Systems required, the fixing of the IMO number on ships in a clearly transparent manner, installation of security alert systems onboard vessels and having the vessels certified with an International Ship Security Certificate. It is estimated that there are over 40,000 vessels worldwide of SOLAS size which will need to conform with these requirements.

SAL is obviously concerned at this additional cost burden but equally appreciates the need to be part of these new security arrangements and is also conscious of the potential significant cost implications should there be a serious terrorist incident involving maritime transport. Member lines remain committed to doing their best to meet the overall objective but this, in turn, requires a collective and co-operative approach from all those involved in the through transport chain as well as adopting as much standardisation as possible. For example, our members are concerned to ensure that individual port security plans and port facility security plans are as consistent and standardised as possible throughout Australia.

The fact that the ISPS Code is an internationally recognised and agreed instrument to secure part of the through transport chain is recognised by our members as an important step forward in achieving as much international uniformity as possible.

We do not believe that the role of the ship's agent has been fully recognised in the ISPS Code and in particular, the training that will be required for such ship's agents throughout Australia, in both major and regional ports, and throughout the world. It is important that the ship's agent is aware of the interaction between the ship and the port and port facilities and of the role that they will be required to play.

We'd also like to bring to the Committee's attention the fact that, important as the scope and reach of the implementation of this Code will be in delivering an outcomes based approach in the fight against terrorism, there are other aspects such as the integrity of the through container chain, advanced crew and passenger reporting and securing vital links in the transport chain outside those of the defined port areas that should at least receive equal attention in our collective efforts to enhance security.

I would reiterate the wish of our members to do everything practicable to conform with Australian security requirements which, we hope, are as standardised as possible. The deadline of 1 July 2004 for the implementation of these measures is very tight and any slippage in implementation of the impending security legislation governing enhanced maritime security measures will impact on the capacity to undertake all the necessary training before 1 July next year.

Please advise if you require any elaboration.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Llew Russell', written in a cursive style.

Llew Russell
Chief Executive Officer



SHIPPING AUSTRALIA LIMITED MEMBERS – June 5, 2003

FULL MEMBERS

Adsteam Marine Limited
ANL Container Line Pty Ltd
APL Lines (Australia)
Barwil Agencies Oceania
Beaufort Shipping Agency Co
Columbus Line Australia Pty Ltd
CP Ships (UK) Limited
FESCO Lines Australia Pty Ltd
Five Star Shipping & Agency Co Pty Ltd
Hapag-Lloyd (Australia) Pty Ltd
Hetherington Kingsbury Shipping Agency
Inchcape Shipping Services
John Swire & Sons Pty Ltd
"K" Line (Australia) Pty Limited
McArthur Shipping & Agency Company
Maersk Australia Pty Ltd
MISC Agencies (Australia) Pty Ltd
Mediterranean Shipping Company (Aust) Pty Limited
Mitsui OSK Lines (Australia) Pty Ltd
NYK Line (Australia) Pty Ltd
OOCL (Australia) Pty Ltd
P&O Nedlloyd Limited
Patrick Shipping
RCL (Australia) Pty Ltd
Wallenius Wilhelmsen
Zim Shipping Australasia Pty Ltd

CONTRIBUTING MEMBERS

Compagnie Maritime Marfret
Consortium Hispania Lines
Contship Container Lines Ltd
COSCO Container Lines
Hyundai Merchant Marine
Neptune Shipping Line Pty Ltd
P&O Swire Containers Ltd
P.T. Djakarta Lloyd (Persero)
Pacific Forum Line (NZ) Ltd
Pacific International Lines Pty Ltd

CORPORATE ASSOCIATE MEMBERS

Albany Port Authority
AusBulk Ltd
Australian Maritime Services Pty Ltd
Blake Dawson Waldron
Brisbane Marine Pilots
CSX World Container Terminals Adelaide
Customs Cargo Automators Pty Ltd
Ebsworth & Ebsworth
Flinders Ports South Australia
Maritime Container Services Pty Ltd
Meyrick & Associates Pty Ltd
Middletons Moore Bevins
Newcastle Port Corporation
Norton White
P&O Ports
Patrick Stevedores
Phillips Fox Lawyers
Port Kembla Port Corporation
Port Kembla Gateway Pty Ltd
Port of Brisbane Corporation
Port Phillip Sea Pilots Pty Ltd
PricewaterhouseCoopers Legal
Queensland Rail
Skilled Engineering
Sud-Chemie Australia Pty Ltd
Sydney Ports Corporation
Thomas Miller (Aust.) Pty Ltd
Thompson Clarke Shipping Pty Ltd
Toll Logistics
Tradegate Australia Limited
Transport Events Management Sdn Bhd
Victorian Channels Authority
Waterway Construction Pty Ltd

INDIVIDUAL ASSOCIATE MEMBERS

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David Clarke
Henning Harders
Victor Paino
Roger Pettman
Tony Redrup
Colin Stein
Ajay Tandon