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SAL21-237

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Department of Agriculture, Water and the Environment

GPO Box 858 Canberra ACT 2601

Dear Sir / Madam

Shipping Australia submission on Australian in-water cleaning standards

Shipping Australia is an industry association that represents participants in Australia's international supply chain.

We provide policy advice and information to approximately 30 full members, which includes ocean shipping lines and shipping agents active in Australia. We have over 40 corporate associate members, which generally provide services to the maritime industry in Australia. These services include port and terminal operations, pilotage, insurance, and legal advice among other things.

Our members handle the vast majority of containerised seaborne cargo imports to, and exports from, Australia. They also handle a considerable volume of our car trade and our bulk commodity trade.

Our members employ more than 3,000 Australians.

Submission:

1. Ocean shipping is a global industry; ships travel to nearly all countries in the world.
2. The ocean shipping industry therefore needs standardised global regulations to operate.
3. Shipping Australia urges the Federal Department of Agriculture, Water & the Environment to ensure that its standards on in-water cleaning align with, and are consistent with, the current international standards as issued by BIMCO:
 - <https://www.bimco.org/about-us-and-our-members/publications/publications/industry-standard-on-in-water-cleaning-with-capture>
4. Shipping Australia also urges that, in Australia specifically, there should only be one standard that applies in all States and Territories.
5. We specifically urge that once a ship is cleared to enter by a government body in Australia then it should be free to enter all jurisdictions in Australia and that State and Territory based bodies should not over-ride, amend, or counter-mand decisions of other bodies; ships should not be turned away once they have been cleared to enter.
6. Ocean going ships are extraordinarily expensive assets to operate and, depending upon the exact circumstances, can cost over AUD\$200 a MINUTE to operate (actual cost, not an

opportunity cost) in the current markets.

7. Ships should therefore not be delayed insofar as it is reasonably practicable.

Authorised by Melwyn Noronha

CEO, Shipping Australia.