

FILE No.
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CLASSIFICATION



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11th August, 2010.

Mr Darrell Channing
A/General Manger - Adjudication Branch
A.C.C.C.
GPO Box 3131
CANBERRA ACT 2601

Dear Mr Channing

Submission in relation to the application by DP World Australia Ltd & Patrick Stevedores Operations Ltd – Authorisations': A91238 – A91240

I refer to the aforementioned submission and subsequent authorisations' made by the ACCC, dated 14th July 2010.

In support of the aforementioned submission, Transport Forum WA Inc. (TFWA) which is Western Australia's peak road transport industry body endorses the submission to the ACCC by Patrick Stevedores and DP World.

Transport Forum was formed in 2000 following a merger between the Road Transport Training Council and the WA Road Transport Association (WARTA), the organisations that have represented the needs of members for close to 100 years.

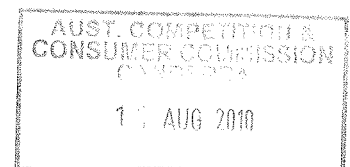
TFWA is affiliated with the Australian Trucking Association (ATA). We regularly consult with community members, industry organisations and government and its agencies.

Importantly, in this case TFWA is an active and key member of the **WA Port Operations Task Force** – an industry consultative body which was established in 1987 to provide a forum of the identification, discussion and resolution of port related issues.

TFWA's submission is given in the full knowledge and support of the WA Port Operations Task Force previously mentioned submission to the ACCC, where it was stated in the second paragraph of their submission:

'The Task Force therefore includes all of the parties involved in the development of the initiative to increase "dual running", the subject of the authorisation application. The matter has been discussed many times at Task Force meetings in the time since the initiative was originally conceived and has always been strongly supported by members'

TFWA wishes to underline the fact that the two stevedores, namely Patrick and DP World were originally approached by the TFWA members / the WA Road Transport Industry and ultimately by government to develop the 'Dual Running' initiative to improve efficiencies within our industry by *improved utilisation of vehicle resources and by the reduction of unproductive empty running vehicle trips.*





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The two stevedores, after a process of on-going industry and supply chain pressures, finally consented to progress this initiative in the best interests of the overall road transport and port community. As it states in the WAPOTF submission **'the direct benefits to the stevedores are minimal'** but by this initiative being authorised to proceed, it is firmly believed that future reductions in road traffic and improved transport efficiencies will greatly contribute to the extended life expectancy of the Fremantle Inner Harbour.

TFWA strongly endorse that the points detailed by the WA Port Operations Task Force in it's submission to the ACCC, are equally valid and supported by its membership. The points that Transport Forum wish to make are:

1. The 'Dual-Running' initiative will inevitably, after a period of time, be used by the more commercially astute port operators to reduce their costs and therefore improve their margins in order to strengthen and grow their businesses securing longer term commercial viability;
2. The 'add-on' benefits flowing from this proposed initiative is already evident by the recent reduction of the booking day's horizon by DP World. This, in itself, is a most welcome development in the stevedores preparing for this new initiative;
3. The inner harbour deepening project and the dockside re-enforcement works nearly completed will herald the advent of *'post panamax'* vessels carrying vastly increased containers (i.e. +50% increase in TEU's per vessel arrival/departure);

This means that these larger vessels will require far faster, more efficient dockside and portside turnarounds and clearances that will test the available transport resources to the maximum. The 'Dual-Running' initiative will prove to be an essential and vital strategy to clear these much larger vessels **within the same timeframe/turnaround times** (2-3 days) that is presently being allowed for the smaller vessels of today;

4. The road traffic congestion experienced within the Inner Harbour presently, is caused by insufficient land storage/handling area and resource capacity can only increase without a host of remedial strategies being tried and implemented, namely through the Port Operations Task Force, in conjunction, with the WA Road Transport Industry. The 'dual-Running' initiative is only but one of those strategies that must be tried.

We ask that our comments are noted and are endorsed for the betterment of operations at Fremantle Inner Harbour.

Yours faithfully

A handwritten signature in black ink, appearing to read "Ian King", written over a large, stylized flourish that extends to the right and loops back down.

IAN K.KING
Chief Executive Officer.