

From: G.Fischer@sunace.com.au [mailto:G.Fischer@sunace.com.au]
Sent: Wednesday, 6 July 2011 1:56 PM
To: Giannakos, Anna
Subject: TRIM: Timeslotting at Empty Container Parks Ref. No. N95413 and N95450 - N95456

Dear Ms. Giannakos,

Following our previous correspondence from 29.06.11 I am formally lodging an objection on behalf of SUN ACE (Aust.) Pty. Ltd. 32 - 38 Remington Drive, Dandenong South VIC 3175 to the proposed system of Timeslotting at Empty Container Parks (ECP). Our company is involved in importing specialty chemicals either as raw materials for the manufacture of plastic additives or to some extent for resale. Most likely you have received objections from other companies in the logistics chain that are better qualified than us to provide an estimated cost to the Container Transport Operators (CTO) which will be undoubtedly passed on to the industry. After discussing the practical implications of the proposed system at great length with our CTO and reading a number of publications on the subject I have come to the conclusion that it is not adding any value to our operation, on the contrary it would make industry less competitive overall and be to the detriment of everybody else involved in the logistics chain. We are also expecting an additional cost on top in form of Demurrage charges due to the late return of empty containers caused by Timeslotting as ECPs don't work on Weekends and Public Holidays but they are included in the available time given for container return by the Shipping Lines.

Timeslotting at ECPs in isolation fails to address the fundamental problem that has been known for at least 6 years which is the mismatch of ECPs operating hours compared to the rest of the transport and logistics industry. This has been identified and documented in a government funded Business Activity Harmonisation Study (BAHS) "Managing the Mismatch - Options for Discussion" August 2005 and six years later the only solution the Empty Container Parks can come up with is to introduce Timeslotting to manage the queue of trucks in the yard. The reality is that the demand for handling empty containers has tripled between 1992 and 2011 and is expected to double again between now and 2030. In my opinion there is a lack of time, space and resources to handle the volume of containers effectively through the Empty Container Parks that needs to be addressed urgently. If at the end there still is a problem with traffic management a notification system could be an option.

I appeal to you to reject Timeslotting until the Empty Container Parks can provide evidence that they have addressed the fundamental problems outlined above as it does nothing to resolve them and it may not be necessary at all thereby avoiding the cost that could cripple the industry.

Best Regards,

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