



Department of Transport

PO Box 2797
Melbourne, Victoria 3001
Telephone: (03) 9655 6666
Facsimile: (03) 9095 4096
www.transport.vic.gov.au
DX 210410

Mr Michael Deegan
Infrastructure Coordinator
Infrastructure Australia
GPO Box 594
CANBERRA ACT 2601

Our Ref:

Dear Mr ^{Michael} Deegan

Victoria's submission to the draft National Ports Strategy

Victoria welcomes the opportunity to provide input to the development of a National Ports Strategy. I am pleased Infrastructure Australia has adopted a collaborative approach to working with stakeholders, including officers in my Department. A copy of our submission is attached.

Victoria recognises many of the issues facing ports are pervasive nationally – for example, the growing freight task, landside bottlenecks and capacity constraints, port buffer zones and urban encroachment on ports. Resolution of such issues will need to be driven at a national level so that jurisdictions and port operators can ensure that efficiencies for port planning and operations are integrated with regional planning and transport strategies across the nation, and coordinated with a National Freight Network Strategy.

As outlined in our submission, Victoria is generally supportive of the overall approach taken in the draft strategy. In particular, Victoria supports the intent of the Strategy to promote better planning for ports and improving landside efficiency and reliability of nationally significant ports. This direction is consistent with the Victorian policy frameworks outlined in *Freight Futures*, *Port Futures* and the associated port land use strategies for the State's four commercial trading ports.

Our nation's ports have developed to serve distinct geographic areas or particular markets and their day-to-day operations and activities have been structured to meet those market needs. Therefore, the need to co-ordinate a national ports network should not necessarily be the primary objective of a national ports strategy. Instead, the importance of ports operating at peak efficiency in the context of their role in serving those markets and international trade should be the focus. While there is some competition at the margins, in Victoria's view, arguments supporting the need to nationally coordinate port activities are not strong.

Victoria believes the Commonwealth Department of Infrastructure and State and Territory governments should be responsible for the identification of significant national ports in consultation with IA and other relevant agencies. I have asked my department officials to liaise with your officials to identify the appropriate role of the NTC in the National Ports Strategy, to ensure NTC's role aligns with its ATC mandate to focus on regulatory reform rather than policy issues.



Victoria acknowledges a role for COAG in overseeing some form of national requirement for appropriate planning documentation for all nationally significant ports. Victoria believes that the most appropriate process for submitting port plans for consideration would be similar to that developed by COAG for the approval of various strategic documents against the *Criteria for Capital Cities Planning* at the 7 December 2009 COAG meeting. We would welcome the opportunity to further discuss the various policy and regulatory interests and roles of COAG, its Ministerial Councils and each jurisdiction in identification and assessment processes.

Victoria also believes there is strong merit in having planning processes that apply to both government and privately owned ports. *Freight Futures* and *Port Futures* have provided Victoria with a strong policy basis to do this and identify critical areas to improve seaside and landside supply chain performance. These strategies build upon ongoing reform of access and pricing matters relating to the use of infrastructure (such as through the Commonwealth led CIRA reforms).

Efficient infrastructure use is part of the solution, but, in itself, cannot be expected to provide the long-term capacity required. A critical role of a national ports strategy is assisting in identifying investment priorities for landside infrastructure, so as to further optimise supply chain capacity and economic growth. The long lead times for such investments mean that prioritisation must occur now.

Information and communication technology (ICT) and, in particular, the automation of container information in the supply chain, would return significant benefits for a modest investment, as has been done elsewhere in the world. A national ports strategy should provide strategic leadership in recognising the significance of ICT infrastructure and the national interests in comparable data-sharing operating across networks to support and expedite cooperation between container ports as they move toward interoperability via a national port community system.

Victoria would welcome further discussions with IA and the NTC in relation to several of the recommendations under the priority areas prior to the final draft going to COAG.

I look forward to the ongoing dialogue between your office and my Department as the Strategy moves into the final stages of drafting. Should you have any questions about Victoria's submission to the National Ports Strategy or require any further information in relation to the policy setting around Victoria's ports, please do not hesitate to contact Mr Lachlan McDonald, Executive Director, Intergovernmental Relations Division, on (03) 90954398

Yours sincerely



Jim Betts
Secretary

27 / 5 /2010

CC: Mike Mrdak, Secretary,
Department of Infrastructure, Transport, Regional Development, and Local Government

Victoria's submission to the National Ports Strategy

1. Introduction

Victoria welcomes and supports Infrastructure Australia's vision for the development of a national ports strategy to provide an effective framework for the regulation, governance, planning and infrastructure needs of the Australian ports network.

The role Victoria's commercial ports play in the national economy is crucial and to protect this role governments must plan for the way their ports operate and interact with the wider freight and transport networks and the surrounding community.

In a letter to the Secretary of the Department of Premier and Cabinet, Ms Helen Silver dated 9 October 2009 Infrastructure Australia (IA) Infrastructure Coordinator, Mr Michael Deegan requested comment on the Terms of Reference for the National Ports Strategy currently under development by IA in conjunction with the National Transport Commission (NTC). Subsequently, an exposure draft was released to key government and industry stakeholders for comment and discussion at a Workshop held by IA officials in Adelaide on 23 February 2010.

This submission presents a response, firstly to the letter to Ms Silver, and secondly provides additional comment arising from the release of the exposure draft. The following should also be read in the context of Victoria's submission to the Freight Network Strategy (also currently being developed by IA) and in the context of Victoria's second submission to IA; and in particular, chapters 5, titled 'National Freight Network Strategy', 6 entitled 'National Ports Strategy' and 7 titled 'A 10-point plan' for the development of Victoria's ports and freight networks.

2. The role of the National Ports Strategy

Following the inaugural round of priority project submissions in October 2008, IA handed its *National Infrastructure Priorities* report to the Commonwealth recommending key priorities for the development of and investment in the nation's economic infrastructure. The IA report identified seven themes to provide a framework for action to meet the gaps, bottlenecks and deficiencies in our nation's infrastructure. One of these themes was 'Competitive International Gateways' aimed at ensuring the development of efficient ports and associated land transport systems to better facilitate imports and exports.

Under this theme, IA identified the development of a National Ports Strategy as a priority, primarily as a result of the large number of port related initiatives received in the 2008 round of project submissions from states. The same priority was identified for the nation's freight network, under the theme, 'A National Freight Network', with the development of a National Freight Network Strategy.

In May 2009, Prime Minister Kevin Rudd announced IA would develop, in conjunction with the National Transport Commission, a National Ports Strategy for consideration by COAG in 2010. The Prime Minister, in his media release identified the need for a nationally coordinated approach to the future development and planning of Australia's port and freight infrastructure. The Prime Minister commented that a National Ports Strategy would address past examples of access to ports that have not been coordinated with land side developments, such as road and rail investments. The Prime Minister identified regulation, governance, planning and pricing as mechanisms that may be used to ensure supply chain efficiency.

The interrelationship between the national freight network and national ports strategies needs to be clearly articulated from the outset. Recognising the key road, rail and intermodal links between nationally significant ports and landside freight connections cannot be done in isolation in the development of principles for non-infrastructure supply-chain solutions at the port.

In Victoria, issues for the Port of Melbourne – the nation's busiest container port – are primarily to do with land-use planning in the port precinct and landside connectivity to the port. These issues are illustrated in Victoria's 2009 submission to the IA project prioritisation process through the development of a 10-point plan for Victoria's ports and freight networks. The 10-point plan illustrates how Victoria has identified the need to increase capacity at the port gate, including through investment in a defined network of road, rail and intermodal links, to ensure ongoing efficiency and long-term sustainability in the face of a rapidly growing freight task.

2.1. Scope of a National Ports Strategy

It is important to be clear about the scope of a national strategy. The port sector is highly diverse including public and private ownership and private operators for stevedoring and freight companies. Furthermore, ports operate on a continuum ranging from fully closed supply chains – in the case of many of the bulk commodity ports – to the open supply chains characteristic of the nation's container ports. It is therefore essential that a national ports strategy is carefully scoped to avoid a one-size-fits-all approach to the diverse set of parameters.

Primary consideration should be paid to the major commercial ports engaged in regional and international trade and therefore of economic significance to both regional and national economies. In Victoria, for example, the four commercial trading ports at Melbourne, Geelong, Portland and Hastings should be identified as nationally significant ports.

A national ports strategy should be high-level and avoid overly prescriptive and unrealistic objectives. A national strategy should identify mechanisms to ensure the sustainable development of nationally significant ports is accounted for through transparent, long-term strategic planning. The task of applying relevant policy measures across container ports as well as bulk commodity ports; privately owned ports as well as publicly owned ports; and metropolitan as well as regional ports should necessitate a strategy that can overlay existing state and territory port planning frameworks rather than attempting to solve issues that are more appropriately dealt with on a case-by-case basis.

Appropriate areas for consideration in a national strategy may include:

- National guidelines for long-term planning for national ports;
- Nationally consistent data collection and forecasting;
- Examples of best-practice in relation to supply-chain management and port ICT interface;
- Commonwealth ports issues such as security, customs, quarantine and environment;
- Future landside infrastructure requirements, including road, rail and intermodal links (consistent with the development of a national freight network strategy); and
- Recognition of national freight flows and the role of nationally significant ports in facilitating cross-border and international trade.

A national ports strategy, as part of a wider freight network strategy could be the basis for responding to many of the transport bottlenecks identified through the annual project prioritisation process, which quantifies the large investment task facing governments in the coming decades.

3. COAG Major Cities Criteria

The COAG Communiqué of 7 December 2009 outlined criteria for states and territories in planning for the nation's capital cities, mandating that by 1 January 2012 all states will have in place plans that meet the criteria and that the Commonwealth will link future infrastructure funding decisions to meeting these criteria.¹

There are synergies between the criteria outlined in Attachment B of the December Communiqué and those contained in the National Ports Strategy Terms of Reference. Both the COAG major cities criteria and the National Ports Strategy aim to ensure nationally consistent standards in planning for and managing nationally significant infrastructure.

With several areas of work underway at the national level through COAG it is crucial that each piece of work is well defined and governments have regard to areas of commonality to avoid unnecessary overlap, or worse, contradiction. The national ports and freight network strategies should therefore have clearly defined objectives that have regard to complementary work being undertaken through COAG. This clarity will facilitate more efficient engagement with key stakeholders in the development of these strategies.

In relation to the criteria set out in the Ports Strategy Terms of Reference, Victoria is well placed to engage with IA having recently undertaken similar development at a state level with the release of *Freight Futures* and *Port Futures*.

4. The Victorian context

Victoria has invested significant time and resource in the development of state specific strategies that address the issues now being raised at a national level. In *Port Futures*, released in August 2009, Victoria has developed a comprehensive framework of priorities and directions for Victoria's ports network. *Port Futures* reaffirms the roles of Victoria's commercial trading ports, lays out plans for improvement of governance arrangements, and explores the issues of productivity, efficiency, port access and appropriate planning for the port environs.

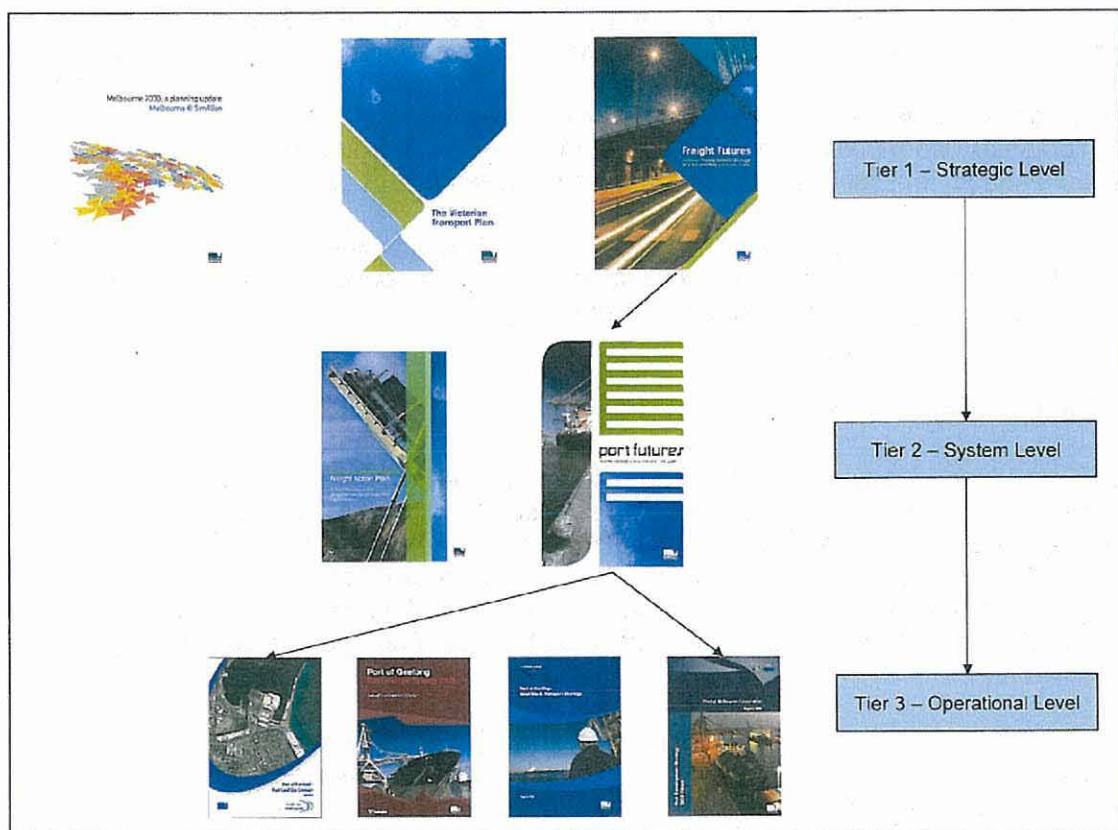
Ports operate in the context of local or jurisdictional networks, national networks and in the global context as international gateways. The role of ports in relation to each of these networks needs to be well defined to ensure the appropriate roles for levels of government and key stakeholders are recognised. In Victoria, for example, the interrelationships between the four commercial ports – Melbourne, Geelong, Hastings and Portland – is carefully considered in the context of the state freight network. These interrelationships are recognised in *Port Futures*, which identifies the need for joint governance arrangements for the ports of Melbourne and Hastings to align planning for Hastings to come online as a second container port when Melbourne nears capacity.

¹ Council of Australian Governments Communiqué, Brisbane, 7 December 2009, p.8.

4.1. The development of Freight Futures and Port Futures – the Victorian experience

In the case of Victoria, the development of *Freight Futures* was the initial step to consolidate thinking around Victoria's freight and port networks. The high-level thinking and actions identified provided the basis for the development of *Port Futures* and its subsidiary port land use strategies.

While Victoria's ports represent major focal points of the freight network, the development of *Freight Futures* in the first instance allowed high-level objectives to be identified in relation to all elements of the freight network – road, rail, intermodal terminals and port - contemporaneously. The following figure illustrates how different tiers of policy development in Victoria have resulted in a holistic approach to land-use and transport planning for the state's freight network, of which ports are an integral part. The hierarchy of *Freight Futures* providing the strategic policy level and *Port Futures* providing the policy at a system level could be used as a model for the development of the national strategies.



Port Futures forms part of the agenda of strategic planning that the Victorian Government has been driving for the past decade, which started through the wide ranging package of reforms implemented in response to *The Next Wave of Port Reforms in Victoria*, released in 2002 and then through the *Victorian Ports Strategic Framework*, released in 2004.

Port Futures continues a philosophy of integrated system thinking consistent with the transport network strategies the Victorian Government released in December 2008, *The Victorian Transport Plan* and the first comprehensive Victorian Freight Network Strategy, *Freight Futures*.

The Victorian Government has consulted extensively with industry, local government and the community in developing these policy statements. They represent decades of experience in managing and regulating ports in the Victorian context and cover issues over which the State Government has control.

Victoria's following discussion focuses on the key topics identified to date in IA's exposure draft:

- effective regulatory and governance frameworks;
- improved planning policy;
- landside productivity and efficiency;
- the critical infrastructure that will be required for optimum operation of the port and its transport connections; and
- Future landside infrastructure requirements (Victoria's 10-point plan).

5. Effective regulation and governance

A key focus of *Port Futures* is the move towards more appropriate governance arrangements for Victoria's commercial and local ports.

This will be achieved in a broad sense through amending the *Port Services Act 1995*, to transfer the function and assets of the Port of Hastings Corporation (PoHC) to the Port of Melbourne Corporation (PoMC), and through the recently enacted *Transport Integration Act 2010* (the Act). The purpose of the Act is to underpin the policy directions and projects in the *Victorian Transport Plan* and to refresh the charters of Government-owned corporations (including the port corporations) to align them with the State's broader transport principles and objectives.

The proposed integration of management of the PoMC and the PoHC will enable a shared vision for the future development of both ports as complementary to each other in handling the current and future container cargo needs of Melbourne and its surrounds.

Under the current model of governance PoHC has effectively been in competition with PoMC in progressing its business planning. The move to an integrated planning model, including a refreshed charter to incorporate the new policy settings, will achieve complementary development and operation of the two facilities.

The expertise provided by the resource base and experience of the PoMC, particularly with the recently completed Channel Deepening Project, and the local knowledge and capability of the PoHC, will be crucial in delivering the development of Hastings in an environmentally sensitive and sustainable manner.

Port Futures also signals a change to the governance arrangements of Victoria's local ports. These ports make a vital contribution to both state and national economies, particularly in regard to the fishing, boating and tourism industries. Effective as of 1 July 2010, their management will be transferred from the Department of Sustainability and Environment to the Department of Transport and under the portfolio responsibility of the Minister for Roads and Ports.

This move will ensure a coordinated future for Victoria's ports system and provide better opportunities to improve transport connections and land-use planning for the ports as well as

provide improved regulatory oversight, governance and management of Victoria's entire ports system.

6. Current and proposed planning policy

In conjunction with *Port Futures*, Victoria's four trading ports have now all released port land use and transport strategies. These documents map out the future land use and transport needs of the ports, to give government, industry and the local community a clear picture of what the future shape of the ports will be. A set of guidelines is currently being developed to ensure these documents are updated on a regular and consistent basis (at least every four years).

Port Futures proposes to clarify and strengthen policies to protect essential port land. Port buffer zones would ensure that governments not only recognise and manage the impacts of port activities on the surrounding community, but also protect the port from inappropriate development encroaching on port land.

It is important that clarity is provided to the ports and the community about what development is appropriate in the interface areas between the port operations and the wider community to minimise any conflict over planning decisions. A national ports strategy, in concert with other planning requirements set by the COAG capital cities criteria, may require ports to demonstrate a commitment to visible long-term planning, recognising this sentiment may present competition issues for some ports engaged in commercially sensitive trade.

Consistent with *Freight Futures*, it is proposed that the State Planning Policy Framework will be updated to recognise Victoria's four commercial ports as Freight Activity Centres and their port land use strategies are included as reference documents. This will ensure that the ports' economic importance and need to operate efficiently will be recognised in all planning decisions made on and in the vicinity of the ports.

A Planning Advisory Committee to the Minister for Planning has been established to review and provide advice on the key directions regarding port planning. The terms of reference for this advisory group have been attached to this submission for your information.

The Victorian Government has recently passed the *Major Transport Projects Facilitation Act 2009* (MTPF Act) which will significantly reduce the time it takes to deliver major transport projects in Victoria. The MTPF Act enables the government to streamline the planning and approval phases so that critical transport projects can be delivered within improved timelines, while still maintaining a robust approvals process.

7. Landside productivity and efficiency

Deepening the shipping channels at the Port of Melbourne has been the major focus for improving port efficiency over the last five years. The recent successful completion of the Channel Deepening Project, ahead of schedule and at least \$200 million under budget, is a significant achievement for the Victorian Government and the PoMC. The improved shipping channels mark a new chapter of more efficient and sustainable operation for the port and its users.

Across Port Phillip Bay, the shipping channels leading into the Port of Geelong have become increasingly constrained by the limited design parameters of its approach channels in Corio Bay. As ships become larger these constraints will only worsen the access arrangements at the port. Subject to the necessary government approvals, the Victorian Regional Channels Authority will progress a staged, long term 'Channel Improvement Program' during 2010. In

December 2009, the Minister for Planning determined that an Environmental Effects Statement was not required for the Corio Bay Channel realignment project. The Authority is currently preparing a referral to the Department of the Environment, Water, Heritage and the Arts for consideration under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

As mentioned above, much of this focus on Victoria's waterside efficiency must now move to improving our landside efficiency as well.

With the overall freight task set to double by 2030 it is more important than ever that our landside capabilities provide for maximum efficiency in the movement of cargo to and from our ports.

The Victorian Government is currently in the process of a two year trial of Next Generation High Productivity Freight Vehicles (HPFVs), with the eventual outcome being a significant capacity gain in our ability to move freight on the state's roads, while also reducing the number of trucks required for the task. These vehicles will be critical in the early establishment of the Metropolitan Freight Terminal Network, currently under development.

Opportunity also exists for greater productivity outcomes at Victoria's ports through more robust pricing and regulatory mechanisms to influence or mandate change and achieve key government policy objectives.

The possibility of securing increased competition and capacity in stevedoring at the Port of Melbourne may provide an opportunity to explore, in conjunction with the PoMC, ongoing productivity improvement through direct negotiations with port service providers. The Victorian Government broadly supports the position of IA on public investment within the port boundary, that, generally, government should focus on ensuring the transport system that services the port is operating as effectively as possible and that port users should pay for infrastructure within the port.

Key infrastructure projects such as the Truck Action Plan will produce massive benefits for the movement of freight in the inner west of Melbourne and further benefits for the impact of truck traffic on community amenity.

The proposed package of road and rail upgrades in the Green Triangle Region will produce similar benefits for the Port of Portland and the local South-West Victorian community. The export of blue gum woodchips in the region is set to rapidly increase and these critical infrastructure upgrades will ensure the region can maximise its economic potential while reducing the impact on the community.

8. Better use of existing freight network infrastructure

A national ports strategy would provide the appropriate platform to extract better use of new and existing infrastructure. In some instances, significant efficiency gains can be made for comparatively little capital investment. Examples of 'smart' projects such as the Port IT and ICT proposals included in Victoria's submission to IA in October 2009 could have national application and could therefore be included in a national ports strategy.

8.1. ICT systems and platforms

It is well recognised that information technology is a key to more informed decision making in transport which is both flexible and responsive.

In supply chains moving through ports, cargo can only move as quickly or efficiently as its paperwork. This is where IT systems and platforms (which enable communication between in-house systems) can help. The logistics of moving freight through ports results in significant information exchange between numerous players (stevedores, Customs, Quarantine, Ports, shipping lines, transport operators, customs brokers, freight forwarders, etc). To exchange information quickly and accurately, sophisticated IT may be utilised within an organisation (government or private), particularly large organisations, however interaction between organisations in port supply chains is often challenging to say the least.

Victoria has some experience in this area, seeing good results from the ongoing development of the Connect Freight initiative by the Port of Melbourne Corporation. This 'system' assists coordination of freight documentation and movement, and is a first step in realising the significant latent potential for smart utilisation of IT in port supply chains. Ideally this would be pursued at a national level to reduce duplication of effort since many of the players operate nationally.

Consistent with the Australian Government's forward-looking view on the development of smart infrastructure, it is essential that soft and hard infrastructure be combined at the conceptual level and that responsible governments ask how smart any proposed hard infrastructure is. In other words, has commensurate IT been incorporated into the proposal, and how will the proposed IT 'sweat the asset'. To be smart, technology should not always be retro-fitted. Ideally, it must be incorporated at the outset, and in terms of technology standards and protocols, be nationally and internationally consistent.

9. Future infrastructure requirements

Victoria supports the work the Australian Government has done over the past two years to put a nation-building focus on the funding of critical infrastructure through IA and the Building Australia Fund.

Victoria continues to develop a strong pipeline of infrastructure projects to achieve its long-term vision for Victoria's transport network, with an emphasis on projects that will improve the integration of freight movement and port access with the operation of the wider transport network.

Several initiatives in particular, including some of those on IA's project pipeline, will secure long-term capacity for Victoria's nationally significant ports and should be considered in the development of national strategies. Key initiatives include a mixture of governance and land-use planning reforms, smart initiatives to promote "better use" of existing infrastructure and investment in key road, rail and intermodal infrastructure. In seeking to achieve these objectives and to complement IA's proposed national freight network and port strategies, the Victorian Government has developed a 10-point Plan.

Victoria's priority infrastructure projects have been selected to meet the objectives outlined in the 10-point plan for the development of nationally significant freight and port networks by:

1. Expanding port capacity in a timely and efficient manner to accommodate trade growth;
 - 1.1. **Melbourne International Freight Terminal**
 - 1.2. **Port of Hastings Development and Hastings Rail Freight Connection**
2. Decentralising non-essential freight activity away from the Dynon-Port precinct;
 - 2.1. **Western Interstate Freight Terminal and Donnybrook Interstate Freight Terminal**
3. Providing efficient and sustainable road, rail and sea connectivity to the ports;
 - 3.1. **Truck Action Plan**
4. Providing additional metropolitan freight terminal capacity;
 - 4.1. **Metropolitan Freight Terminal Network**
 - 4.2. **Melbourne International Freight Terminal**
 - 4.3. **Western Interstate Freight Terminal and Donnybrook Interstate Freight Terminal**
5. Providing improved access to metropolitan freight terminals in Freight Activity Centres to the west, north and south-east of Melbourne and better interconnectivity between terminals;
 - 5.1. **North East Link**
 - 5.2. **Peninsula Link**
6. Planning for better integration of the Victorian freight network with the national network;
 - 6.1. **Western Interstate Freight Terminal and rail freight bypass**
7. Improving approaches to integration of freight activity and land-use, including better planning protections for ports and other freight facilities and adoption of best practice ICT solutions;
 - 7.1. **Identification of a Principal Freight Network**
 - 7.2. **Development of a Smart Ports ICT program**
 - 7.3. **Development of a Smart Freeway Management program**
8. Improving governance and regulatory settings to provide for better coordination of freight infrastructure development for efficient and sustainable operations;
 - 8.1. **Port of Melbourne Corporation and Port of Hastings proposed governance arrangements**
9. Develop Network Operating Plans that provide road use priority and support these priorities through state investment in the arterial road network and through cooperation with local government; and
10. Provide improved incentives to industry to promote more efficient freight movements to the Port of Melbourne by implementing a Port of Melbourne Freight Access Charge.

10. Conclusion

Victoria is in a position to make a valuable contribution to the development of national port strategy. Experience gained in the development of frameworks for the State's ports and freight networks may be applicable to the process at a national level. While the development of *Freight Futures* and *Port Futures* has proved effective in the case of Victoria, it should be noted that the development of these strategy documents may not be practical in all jurisdictions, some of which have well developed legislatively enshrined frameworks for management of their port assets. Recognising this, a national ports strategy should avoid seeking to mandate overly prescriptive policy and planning frameworks for national ports. A national ports strategy could assist jurisdictions by:

- recognising the importance of national ports to the national and regional economies;
- providing an overarching strategy to assess and prioritise future infrastructure investment and reform initiatives to make better use of existing port and port landside infrastructure;
- encouraging integrated and transparent planning for nationally significant ports;
- promoting examples of best practice planning and management of nationally significant port and land-side infrastructure; and
- recognising the role of ports in the context of a national freight network plan.

A national ports strategy should also be consistent with other work ongoing at a national level, including the objectives outlined in its COAG Communiqué of December 2009, which requires jurisdictions undertake effective short, medium and long term planning for capital cities.

Victoria looks forward to continued engagement with Infrastructure Australia to help develop the national thinking in light of the experience in Victoria to date. Victoria would also seek to comment on the draft strategy before it is submitted to the IA Board for approval.

Please find attached a copy of Victoria's detailed strategic vision, *Port Futures*, as well as a copy of Victoria's 10-point plan for the development of Victoria's ports and freight network. This plan was submitted to IA as part of Victoria's Project Prioritisation Submission in October 2009 and has been written to achieve the objectives of *Port Futures* as well as complement the national freight network and ports strategies.