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Mr Michael Deegan
Infrastructure Coordinator
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Office of the Infrastructure Coordinator
Level 21 Deutsche Bank Building
126 Phillip Street
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Dear Mr Deegan,

DRAFT NATIONAL PORTS STRATEGY

Thank you for providing the opportunity to provide comments on the Draft National Ports Strategy document (the Strategy).

Many of the concepts that are developed in the draft Strategy have the potential to benefit Australia and its ports. The emphasis on integrated land use planning is strongly supported and will address a number of key issues such as urban encroachment on ports and the need to address land side costs, including increasing freight transport efficiencies. Ideally the work on land use planning would build on and align with work already agreed by COAG to develop capital city strategic planning systems.

It is our view that ports support economic growth by facilitating internationally competitive supply chains. Accordingly, your efforts to gain support from port operators to adopt and use internationally agreed key performance indicators to drive improved productivity and competitiveness is critical to Australia's future economic prosperity. The draft Strategy would benefit from inclusion of this initiative as a key deliverable from the Strategy.

The draft Strategy would also benefit from some detail on current ports, their location and ownership, trade and current competitiveness. This would help those less informed readers to put some context around the issues that are raised.

The Strategy recommends three levels of integrated planning for ports and these concepts are supported. However, it may also be useful to raise issues of across-border planning in the context of national supply chains. An example of such planning is the collaborative work being undertaken by Victoria and South Australia in the south east of South Australia and south west of Victoria (the Green Triangle region).

It is suggested that further work is needed on the proposed governance arrangements for the Strategy, in particular, the proposed role of the panel, the COAG Reform Council and NTC. This matter may need to be further advanced as a result of today's IWG meeting. A particular concern is the proposed annual monitoring and reporting to COAG, which if reduced to once every 3 years (perhaps after a first report after year one), may be more productive. If the proposal for KPIs are accepted this will reduce the need for other forms of reporting.

The proposal for a nationally consistent environment management regime is supported, particularly the recognition that the proposed regime will take account of differing levels of risk in different ports.

One of the early deliverables from the Strategy is likely to be the adopting of ICT systems for container information and management in the supply chain. This should include as a minimum, interoperability among ports and the land side supply chains. Ideally one national system should be adopted across container supply chains. The Strategy would benefit from a greater focus on this area.

I look forward to assisting you in progressing the draft Strategy, to its adoption by COAG and to its implementation by State agencies and port operators.

Yours sincerely,



Jim Hallion
CHIEF EXECUTIVE

28 May 2010