



FREIGHT AND LOGISTICS COUNCIL OF WESTERN AUSTRALIA

Mr Mick Kinley
Chief Executive Officer
Australian Maritime Safety Authority
GPO Box 2181
Canberra ACT 2601

Dear Mr Kinley

Weighing of Shipping Containers

The Freight and Logistics Council of Western Australia (FLCWA) was formed in 2009 to provide independent advice to the State Government on strategic policy issues impacting the provision of good freight and logistics services in WA. The Council comprises senior decision-makers from both industry and Government.

FLCWA has a long-standing interest in the issue of weighing shipping containers, the most recent focus being with the State's introduction of a Compliance and Enforcement legislative regime. Against that background, members have been following related discussions at the International Maritime Organisation (IMO) which have resulted, as we understand it, in a decision that all container weights declared on Bills of Lading must be verified before loading, the new requirement to take effect from the middle of next year.

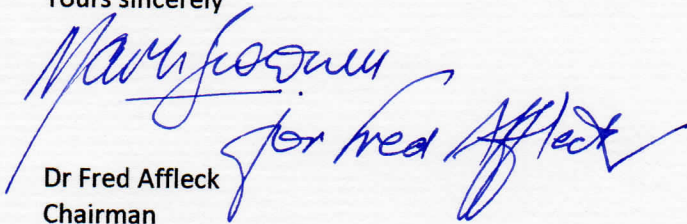
A stronger shipping container weighing regime is an outcome for which FLCWA has argued over a number of years. There are clearly safety considerations, both on land and sea, which support this position. But there are also other factors at play such as premature deterioration of the road network and the heavy transport that use it.

Notwithstanding this Council's support for progress on the issue, as proposed by the IMO, members are concerned about implementing the initiative. Well before this latest decision, FLCWA had identified significant shortcomings in the weighing of containers, both at the Port of Fremantle and at the point of origin, be it exporters' or packers' premises. These shortcomings are then potentially carried forward in associated documentation through incorrect weight declaration.

FLCWA understands that AMSA has responsibility in this country for the introduction of the new IMO regime. Members would greatly value your advice on the implementation difficulties raised here, particularly given the extremely tight timetable that has been laid down by the IMO decision.

Thank you for your consideration.

Yours sincerely


Dr Fred Affleck
Chairman

07/10/2015