**PRESENTATION TO MARINE PEST SECTORAL COMMITTEE – INDUSTRY CONSULTATION GROUP – MEETING HELD 29 OCTOBER 2014**

Port Management of Introduced Marine Pests

In FY 2012 – 13, there were more than 31,000 vessel calls at Australia’s 46 major ports. (This includes cruise ships and Defence vessels calling at commercial berths, not RAN berths). [[1]](#footnote-1)

The total sea freight task (imports and exports) was $502.4 billion in 2012/13.[[2]](#footnote-2) Shipping accounts for over 99% of Australia’s total trade, by weight. Australia’s economy is projected to grow at an annual rate of 3% to 2025.[[3]](#footnote-3) From now to 2025, Australia’s trade is forecast to grow by 129%, nearly double the rate of world trade growth[[4]](#footnote-4). According to HSBC, it is anticipated that Australia will become the world’s second fastest growing exporting nation behind China. Australia’s export sector to 2025 will continue to be dominated by raw materials and energy exports, contributing almost half of total export growth in the forecast period.[[5]](#footnote-5)

What does this mean for the number of vessels calling at Australian ports? Between 2013 and 2025, vessel activity at Australian ports is forecast to grow by 28%. Bulk vessels, mainly at regional ports, are expected to account for 56% of this activity, with containerships accounting for 26%.[[6]](#footnote-6)

The largest growth in total trade movements between 2013 and 2025 will occur at Melbourne and Brisbane (both 34%) followed by Sydney and Fremantle (both 28%).[[7]](#footnote-7) Containerised trade at all Australian ports is forecast to almost double by 2025.[[8]](#footnote-8) Subtropical and tropical regions of Qld and WA are likely to experience high growth in bulk export trade of iron ore, coal and LNG.

Containerised imports are forecast to rise by 50% between 2013 and 2025.[[9]](#footnote-9) China and SE Asian countries are likely to account for the majority of Australian containerised exports by weight.

More ports will become subject to long-term leasehold arrangements. The ports of Brisbane, Port Botany, Newcastle and Port Kembla joined the list of long-leased ports; a club which already has Flinders Ports, Geelong and Portland as members. New member in the ensuing 12 months are likely to be Melbourne, Townsville and Gladstone.

What is keeping the environment managers at our ports awake at night? The top 3 issues identified by Ports Australia earlier this year were:

* port development/dredging approvals;
* compliance (general environmental management); and
* air emissions (dust and port emissions).

Well down the list came Marine Pests be it detection or monitoring, cost-sharing/cost recovery. Far from indicating complacency, it indicates that the risk that introduced marine pests pose to the port environment are somewhat less of a concern to port managers than, say, the risks to safety and navigation posed by not getting the necessary approvals to dredge berth pockets or channels.

Ports manage the biosecurity risk in partnership with their state and federal regulators. As Western Australia requested this discussion item, I’ll refer to examples from WA. A couple of years ago, a vessel presented at a port with some significant biofouling. The Harbour Master ordered the vessel to move out of port waters. He was acting under the WA *Port Authorities Act* and cited navigational and safety concerns as the basis for his direction. He did not and does not have the power to instruct the vessel to decontaminate its hull. He referred the matter to WA Fisheries who were able to direct the vessel to undertake the decontamination activities. The Harbour Master’s prime responsibility is to ensure the safety of shipping in waters where he or she has that jurisdiction. These powers and authority are not unique to WA but applicable to other states and the NT.

When dredges, offshore oil and gas support vessels and other non-trading vessels are concerned in WA, reference is made to the Department of Agriculture’s guidelines for non-trading vessels and to WA’s Department of Fisheries Risk Assessment. These vessel operators are asked to complete the risk assessment and demonstrate that they are complying with Fisheries’ policy. Fisheries will sign off on the vessel operator’s risk assessment and undertakings. Again, port regulations do not come into play here. The port is not the regulator for marine pest inspection or cleaning. The port will advise the vessel’s operators of their obligations under Commonwealth and state legislation and regulation but they cannot enforce it.

Port environment managers are very much aware of the anti-fouling and in-water cleaning guidelines. The guidelines state that vessels should be removed from the water for cleaning, however, the size and contractual obligations on vessels means that only in selected incidences, such as dredges and other non-trading vessels, will they be they be directed to a facility large enough for them to be cleaned out of the water eg back to Singapore. There is limited capacity to undertake dry docking inspections or treatment for larger vessels in Australia.

State regulators will accept in-water cleaning provide the risks are appropriately managed. Ports are well aware of the practical issues of actually undertaking an in-water clean with strong running tides, currants, waves and sea swell (often running in competing directions), low visibility, just to mention a few of the issues.

Whilst ports do not generally support the practice of in-water cleaning within port areas, anecdotal evidence suggests that this practice is being undertaken, and claims are being made with respect to the effectiveness of this practice.  We suspect that some operators are cleaning at sea and then returning to port. There have been multiple instances where in-water cleaning has been required which have been shown to be ineffective in removing target species particularly in niche areas.  This raises the difficulty as to how these operators are able to demonstrate that cleaning has been done thoroughly and properly?

Ports are not in favour of in-water cleaning due to the obvious risks of both IMP introduction and contamination. In-water cleaning can result in hulls being scraped and we have the very real issue, recognised by the IMO, of organisms or anti-fouling coatings – perhaps laced with TBT – falling to the seabed. This has the very real potential of interfering with dredging and the disposal of dredged material.

We want to continue to work with the regulators but we want them to remain focused on ensuring that the regulatory responsibility remains with the state, territory and Commonwealth and for the jurisdictions to provide a consistent national approach to the matter.

The WA Department of Fisheries has been working on the In-Water Cleaning Guidance Statement. These are designed to meet the minimum acceptable standard for any prospective in-water treatment and help minimise the risk of prosecution under the WA *Fisheries Resource Management Act.* The Guidelines encourage the development of in-water treatment systems that demonstrate no adverse effect on the thickness or efficacy of the operation of anti-fouling coatings, and collection and disposal of treated material.

We are concerned that the WA Guidelines leverage off the theory around in-water cleaning, and do not really address the technical or operational matters associated with the practice within an operational setting, for example:

* ensuring a minimum water depth of greater than 10 metres and water flow greater than 3 metres per second;
* the need to demonstrate the effectiveness of in-water cleaning systems which target and collect all material greater than 50 microns for disposal as quarantine waste; and
* all discharge waters to be laboratory tested to ensure no antifouling or other chemicals are not released to the environment).

The practicality of this approach on a 90m+ offshore rig tender whilst at sea is questionable.

We recognise that state, territory and federal regulators and ports must work alongside one another to design systems that are effective for monitoring any IMS introductions then managing the risk. We want to work together to manage the risk and achieve practical outcomes. Ports also want to remain closely engaged with the regulators and not sidelined into a separate groups headed “industry consultation”.

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29 October 2014

1. Ports Australia 2012 – 13 Trade Statistics [↑](#footnote-ref-1)
2. BITRE Statistical Report, *Maritime Australian Sea Freight 2012/13,* BITRE 2014 [↑](#footnote-ref-2)
3. OECD 2012 – *Medium and long-term scenarios for global growth and imbalances,* OECD Economic Outlook [↑](#footnote-ref-3)
4. World Tourism Organisation 2013, *Tourism Highlights 2013 Edition*, UNWTO, Madrid [↑](#footnote-ref-4)
5. HSBC 2011, *New HSBC Forecast Tool Predicts Continued International Trade Book for Australia to 2025,* News Release 12 October 2011, HSBC [↑](#footnote-ref-5)
6. BITRE 2010, *Australian Maritime Activity to 2029 – 30,* BITRE, Canberra [↑](#footnote-ref-6)
7. Ibid [↑](#footnote-ref-7)
8. Calculated from figures in BITRE 2010, *Australian Maritime Activity to 2029 – 30,* BITRE, Canberra [↑](#footnote-ref-8)
9. BITRE 2010, *Australian Maritime Activity to 2029 – 30,* BITRE, Canberra [↑](#footnote-ref-9)