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<b>Organisation (if applicable)</b>	Freight & Trade Alliance (FTA)
<b>State</b>	Queensland (QLD)
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<b>Published name</b>	Freight & Trade Alliance (FTA) / APSA
<b>Do you agree that the elements of an object as outlined in the discussion paper are aligned with your expectations.</b>	Disagree
<b>Please state what the alternatives might be.</b>	<p>While defining an object for the Shipping Registration Act may provide clarity and alignment with modern industry practices, FTA/APSA emphasises the importance of thoroughly assessing the practical and financial implications of a Strategic Fleet for the industry. In our meeting with Andrew Johnson from the Department of Infrastructure, Transport, Regional Development, Communications and the Arts on 14 November 2023, FTA/APSA highlighted the need for a clear understanding of how the costs of such an initiative would impact stakeholders. Additionally, we stressed the importance of gauging sufficient industry support, as this would be critical for any Strategic Fleet to succeed commercially.</p> <p>Moreover, significant investment has already been directed towards rail infrastructure projects, such as Inland Rail, to manage growing freight demand sustainably. Rail has become a central pillar in Australia's logistics strategy, offering a scalable solution that reduces pressure on road networks and supports environmental goals. Shifting focus from rail to a government-led Strategic Fleet could potentially divert resources from this sustainable alternative, impacting both efficiency and progress towards net zero.</p> <p>Therefore, while FTA/APSA sees value in establishing an object for the Act, we recommend that any strategic initiatives thoroughly consider financial implications, industry viability, and alignment with long-term investments in sustainable infrastructure.</p>
<b>Please indicate your agreement or otherwise to the changes proposed at Section 3 of the discussion paper.</b>	Disagree
<b>Please state the reasons why.</b>	
<b>Please provide any suggestions as to alternative ways or enhancements to the proposed changes that will improve the operation of vessel registration.</b>	<p>FTA/APSA supports efforts to streamline and modernise the vessel registration process, particularly changes that reduce administrative burdens and improve efficiency. Simplified registration, digital processes, and flexible registration options would benefit industry stakeholders by reducing compliance costs and making the system more accessible.</p> <p>However, FTA/APSA notes that the Strategic Fleet initiative may introduce complexities that could counteract these efficiencies, especially if additional compliance requirements are introduced. For industry stakeholders, balancing modernisation of registration with minimising any extra regulatory burdens associated with a Strategic Fleet will be essential to maintaining operational efficiency.</p> <p>In conclusion, while modernisation of the registration system is a welcome step, FTA/APSA recommends that changes remain cost-effective and aligned with industry needs. Further consultation with industry stakeholders will be essential to ensure that any adjustments to the registration process, particularly if pursued alongside a Strategic Fleet, are practical and supportive of existing logistics frameworks.</p>
<b>Do you have any additional comments or suggestions for other improvements to the registration system?</b>	
<b>Do you think the current registration system is acting as a disincentive to registration. If so, in what way?</b>	The decline of Australian-flagged container shipping lines is primarily due to high operating costs, stringent regulatory requirements, and global competition favouring foreign registries. This trend has led to a significant reduction in Australian-registered container vessels over the past few decades. While government initiatives, such as the proposed Strategic Fleet, aim to address these challenges, their effectiveness remains uncertain. Additionally, there appears to have been limited industry consultation regarding the feasibility and appetite for an Australian-flagged fleet, raising concerns about its commercial viability and industry support.
<b>In what ways are foreign registers more attractive?</b>	Container shipping is a global business, and companies often seek registries that offer the most operational and financial flexibility. The international nature of the industry means that many shipping lines prefer to register their vessels in locations that support lower-cost, streamlined operations to maintain a competitive edge. This trend has significantly reduced the appeal of Australian registration, especially for larger shipping lines engaged in extensive containerised trade routes.

What would make Australian flagging of a vessel more attractive?	
What have been the main impediments to registering a vessel in the AISR?	
What would remove the barriers to registration and improve the attractiveness of an international register for Australian owners and operators to increase the size of the Australian fleet?	
Are the removal of the current exemptions, as outlined in the discussion paper, appropriate?	
Are there additional insights or comments you would like to offer as part of this review process?	