

Friday, 3 June 2022

To,

Te Manatu Waka,
Ministry of Transport,
Supply Chain Consultation
Supply.chain@transport.govt.nz

Subject: Ports of Auckland Ltd submission to the New Zealand freight & supply chain issues paper.

Dear Sir/Madam,

Ports of Auckland Ltd supports the establishment of a NZ Freight Strategy.

Our submission has been coordinated through the New Zealand Port Company CEO Group and we fully endorse the comments and feedback presented in their submission.

We would however reiterate the following key points that must be given serious consideration in any future NZ Freight Strategy;

- Protecting wider supply chain infrastructure to ensure it can function efficiently and 24/7.
- The Public Works Act is no longer fit for purpose to protect future routes (rail widening, road widening, grade separation etc),
- Council Unitary / District Plans do little to protect routes from intensification / reverse sensitivity issues / conversion to cycle lanes / congestion etc, and Council Unitary / District Plans often prevent 24/7 operation (ban on night-time deliveries or onerous noise controls).
- A solution may be to have a National Policy Statement for the Supply Chain to elevate the importance of the supply chain under the RMA and District Plans

While the strategy will take some time to develop and implement, we encourage government to act quickly on some low hanging opportunities, such as:

- a. Push industry wide alignment to 24/7 operations to use all available capacity which is critical for resilience
- b. Set Peak/Off Peak (or Congestion) pricing to spread freight demand over road and rail
- c. Incentivising supply chain efficiency based on two-way loads and balanced cargo flows
- d. Drive a NZ Inc decarbonisation strategy to achieve targets – we cannot allow regional initiatives to dictate targets. NZ Inc supply chain is 'a whole of NZ' as visiting ships call multiple NZ Ports and road, and rail are across multiple regions. Therefore, any such schemes need to be managed at an NZ Inc level.
- e. When considering schemes – target self-funding schemes where all users contribute, and rebates or rewards are paid back to those who drive the lowest carbon footprint, e.g.: vessels burning low sulphur fuel or trucks using biodiesel/alternative fuels or operating newer, more efficient types of equipment

- b. Safety across the supply chain needs to be maintained and perhaps a stronger oversight to standardising best practice and codes of practice across the supply chain. E.g., development of a 'Code of Practice' (similar to Australian terminals) that is consistent across all ports in NZ. We know an accident can have a severe impact on business, its people, the wider supply chain and NZ does not have the resilience to pivot quickly.

POAL would be happy to be included in any future engagement on this important matter.

Yours sincerely



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Chief Executive Officer
Ports of Auckland Ltd



Craig Sain
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