

Date: 7 September 2021

**RESPONSE TO LINX SUBMISSION DATED 19 AUGUST 2021
AND NOTICE ISSUED BY THE NCC TO FLINDERS PORTS DATED 24 AUGUST 2021**

Background

1. This submission provides the response of Flinders Ports in relation to the following documents:
 - a) the submission provided to the Council by LINX dated 19 August 2021 (**LINX submission**) in response to the notice issued by the Council to LINX dated 5 August 2021; and
 - b) the notice issued to Flinders Ports by the Council dated 24 August 2021 (**Notice**).
2. This submission adopts the same definitions used by Flinders Ports in its previous submissions to the Council in relation to this matter.

Overarching comments on LINX submission

LINX does not acquire a “regulated” service under the SA Ports Access Regime

3. For the reasons set out in Flinders Ports’ submission to the Council dated 16 July 2021, Flinders Ports does not supply LINX with any service that constitutes a “regulated service” under the SA Ports Access Regime.¹
4. Accordingly, the concerns raised by LINX are not relevant to the Council’s consideration of this matter and must not, pursuant to section 44M(4)(b) of the CCA, be taken into account in determining whether the SA Ports Access Regime should be re-certified.

Lack of visibility is addressed by ESCOSA

5. LINX claims that because it does not have visibility over whether there is preferential treatment by Flinders Ports to its vertically integrated related entities, this *“in itself, provides powerful evidence that the Regime is not working as it should.”*²
6. This proposition is misguided and erroneous. ESCOSA has sufficient visibility over the operation of the SA Ports Access Regime and Flinders Ports’ compliance with it. As previously submitted to the Council, ESCOSA has over the last 10 years continually found that Flinders

¹ Flinders Ports Response to Draft Recommendation of the National Competition Council, 16 July 2021, paragraphs 10-28 (**Flinders Ports Response**).

² LINX submission, paragraph 5.

Ports does not provide preferential treatment to its vertically integrated related entities as claimed by LINX.³

7. The fact that LINX has no evidence of this issue does not lead to a conclusion that the allegations are, in fact, occurring but are simply not visible – the reason why there is no evidence is because the allegations are untrue.

LINX appears to be complaining about vigorous competition

8. LINX claims that *“despite LINX’s best efforts to provide a competitive offering to customers, it has seen a degradation in LINX’s market share at Port Adelaide coupled with an increase in FLOG market share.”*⁴
9. LINX suggests that the result of this change in market share is as a result of anti-competitive preferential treatment by Flinders Ports to its related entities. There is no basis or evidence to support this proposition and none has been provided. LINX’s submissions are accordingly baseless, unsupported in fact and cannot be relied upon by the Council.
10. To the contrary, as set out in Flinders Ports’ previous submissions, there is ample, clear and objective evidence that demonstrates that:
 - a) the South Australian stevedoring industry has traditionally been a cosy duopoly between LINX (or its predecessor Patrick) and Qube⁵;
 - b) FLOG is a new entrant, and through efficiencies and innovative services, has competed vigorously in this market to gain market share over time⁶;
 - c) there are several stevedores that compete vigorously in the market⁷; and
 - d) FLOG has recently lost rather than gained market share⁸ – clear evidence that dispels the claims made by LINX.

LINX’s failure to raise a dispute with ESCOSA is not evidence that the SA Ports Access Regime fails to meet the test for re-certification

11. The LINX submission states that LINX *“has queried the utility of raising its concerns as an access dispute with ESCOSA as this could potentially be a costly and time consuming process in circumstances in which LINX understands that other stevedoring operators have raised concerns with ESCOSA to no avail.”*⁹

³ ESCOSA Reviews.

⁴ LINX submission, paragraph 6.

⁵ Flinders Ports Response, paragraph 64.

⁶ Flinders Ports Response, paragraph 49(b); Flinders Ports Submission to National Competition Council dated 26 May 2021, paragraph 70(d)-(e).

⁷ Flinders Ports Response, paragraph 49(c).

⁸ Flinders Ports Response, paragraph 49(c).

⁹ LINX submission, paragraph 15.

12. LINX's failure to utilise the SA Ports Access Regime however is not evidence that the SA Ports Access Regime does not meet the test for re-certification. It is evidence of nothing other than LINX having not sought to use the processes available to it under the SA Ports Access Regime. LINX has no basis or experience to claim (and has not provided any) that the dispute resolution process under ESCOSA is costly or time consuming. Indeed, Flinders Ports suspects that the reason that LINX has not engaged the processes under the SA Ports Access Regime is because LINX does not actually acquire a "regulated service" under the SA Ports Access Regime.
13. Further, just because a stevedore may raise a dispute with ESCOSA but not obtain a favourable outcome (especially where the stevedore does not actually acquire any "regulated service"), this is not evidence that the process is problematic or that the SA Ports Access Regime does not meet the test for re-certification. Rather, this is likely to be evidence that the stevedore's complaint was not valid. If the opposite were the case as suggested by LINX, every losing party to a dispute could argue that the process is faulty rather than whether it lost on the merits of the case.
14. LINX states that '*LINX understands that other stevedoring operators have raised concerns with ESCOSA to no avail*' yet until Qube's recent approach to ESCOSA, which remains to be determined, there had been no such formal complaints.

Conclusion

15. For the reasons above and for the reasons set out in the previous submissions of Flinders Ports, the allegations made by LINX in the LINX submission are unsupported, erroneous and disingenuous.

Response to the Notice

Please confirm whether the 2015 Bemax/Cristal Mining contracts referred to by LINX were indeed won by Flinders Logistics Pty Ltd (Flinders Logistics).

16. FLOG had been providing stevedoring services to Cristal Mining Australia Limited (**Cristal**), formerly Bemax and now Tronox, for certain products since 22 March 2013.
17. LINX was providing stevedoring services to Cristal for certain "wet product" until contract expiry in 2015. Around this time, Cristal transferred the stevedoring of that product to FLOG. The transfer of stevedoring services for "wet product" to FLOG was not the result of any pricing advantage enjoyed by FLOG over LINX through vertical discrimination. It was because FLOG invested in additional equipment to service the greater volumes.

Does Flinders Ports charge Flinders Logistics a per tonnage fee for utilising its own equipment, such as its rotainer crane, and if it does, at what rate?

Does Flinders Ports charge Flinders Logistics storage fees, and if it does, at what rate?

18. The allegations made by LINX about the \$1.10 fee are false and misleading. The reason for the fee has not been explained to the Council but has been taken out of context.
19. Flinders Ports provides the following information to the Council in relation to this issue:
- a) In 2008, Flinders Ports and LINX (at the time, Patrick) were negotiating the establishment of a proposed joint venture for the use and operation of a ship loader at Berth 29;
 - b) In September 2008, the parties agreed not to proceed with the joint venture and on 30 September 2008, other commercial terms were agreed between the parties to govern all aspects of their relationship (including stevedoring services provided by LINX to its customers at Berth 29 through the use of its shiploader);
 - c) As part of those commercial arrangements and in light of the joint venture not proceeding, the parties agreed to:
 - i) the licence fee of \$1.10 per tonne for all product stevedored by LINX's own ship loader at Berth 29; and
 - ii) LINX being permitted to keep its shiploader at Berth 29 for a period of ten years given the proximity to landside infrastructure used to service the Cristal (then Bemax) contract.
20. In light of the above, the licence fee paid to Flinders Ports by LINX stems from historical arrangements agreed to between the parties covering a range of matters rather than a standalone charge for stevedoring at Berth 29.
21. In 2019, Flinders Ports commenced publishing a Mobile Loader Fee of \$1.60 per tonne for all stevedores. This fee is currently \$1.68 per tonne and applies to all stevedores including FLOG to the extent that they use a mobile loader in the provision of stevedoring services.
22. For the reasons above, there is no price discrimination between stevedores at Berth 29 as suggested by LINX. Flinders Ports denies that it has ever adopted any structures or charging mechanisms which provide for the installation of equipment particularly suited to the operations of Flinders Ports' related entities. Flinders Ports also denies that it imposes non-cost reflective charges on parties which use equipment not provided by Flinders Ports.
23. Flinders Ports charges FLOG market rates to lease dedicated areas for offices of FLOG as well as the storage of cranes.

What circumstances led Flinders Ports to ask LINX to vacate the vessel it was working to accommodate a vessel to be worked by Flinders Logistics in 2016?

How are berthing arrangements at proclaimed ports determined?

If the berthing arrangements may require a landed ship to be immediately vacated to allow immediate access for an incoming vessel to be worked by Flinders Logistics, please explain on what basis this can occur? And, are there equivalent provisions that would require a landed vessel being worked by Flinders Logistics to cease loading/unloading and vacate to allow a vessel to be worked by a competing business to immediately load/unload?

24. The allegations made by LINX about this issue are false and misleading.
25. LINX has not provided any factual details in the LINX submission about what which vessels are alleged to have been given priority over which other vessels, what dates this occurred on and what was done or said. The bare allegations are not supported by any documents, facts or evidence. In such circumstances, it is virtually impossible for Flinders Ports to understand what allegation is being made against it and what response it can provide.
26. In any event, Flinders Ports notes that the berthing allocation rules are publicly available on the Flinders Ports' website.¹⁰
27. Those rules do not require a ship at berth to vacate to allow immediate access for an incoming vessel to be worked by FLOG (or any other stevedore). There are some priority based rules relating to the use of specific fixed facilities located at that berth such as the shiploader, cranes and storage facilities but priority is not based upon the identity of the stevedore. Priority based rules may also be negotiated with a client. For example, certain priorities apply to the sulphur import vessels at Berth 29 in favour of the client / cargo owner BHP (with the cargo stevedored by LINX) because the sulphur shed built by Flinders Ports for BHP to attract this trade is immediately adjacent to the Berth 29 wharf area.
28. Flinders Ports has, at all times, acted in accordance with these rules – that is, it has never provided preferential berthing access to any particular stevedore including FLOG.
29. **Annexure A** sets out a summary of all vessels that arrived and departed from Berth 29 in 2016. The summary shows that there was only one vessel (Zambesi) that was required to leave the berth for another vessel (SBI Zeus) due to “rudder indicator issue” and “steering issues”. This was not because of any priority given to FLOG over another stevedore.
30. In addition, Flinders Ports notes the following:
 - a) Berth 29 has traditionally been a minerals-based berth. It was not designed to be used for other types of products in particular food products like grain given dust, health and environmental concerns.

¹⁰ Please see Master Port Rules at section 4.1. For Port Adelaide, berthing is also governed by section 3.1 of the Port Adelaide Port Rules.

- b) Similarly, the relevant loader at Berth 29 is not a grain loader and was not designed to load grain for the same reasons. It was also highly inefficient for use as a loader of grain.
- c) Around 2015, LINX was using Berth 29 and the relevant loader to export mineral sands not grain. However, without notice to Flinders Ports and without seeking consent or a variation to its licence agreement, LINX loaded grain at Berth 29 via the loader for its customer Cargill on a trial basis.
- d) Given the significant commercial ramifications for Cargill and LINX if this conduct was stopped, Flinders Ports provided temporary approval for the loading of grain on a trial basis at Berth 29.
- e) Once the trial was complete, the serious dust and environmental consequences as a result of loading grain from the loader were apparent. There were also potential health and safety issues.
- f) In light of this, Flinders Ports' initial position was that grain should not be carried over Berth 29 at any time by any party. However, to ensure adequate berthing space for Cargill and LINX grain exports at all times, Flinders Ports made the following agreement with Cargill and LINX at the time:
 - i) Grain loading would be transitioned from Berth 29 to another berth;
 - ii) To cater for this, Flinders Ports had made development applications to carry out maintenance and modifications to Berths 18 to 20 as well as Osborne 1;
 - iii) LINX was permitted to use the existing loader at Berth 29 but only for the next Cargill vessel. After loading, Flinders Ports, Cargill and LINX would identify issues and rectification plans until the transition was complete;
 - iv) Cargill agree to move to another suitable berth nominated by Flinders Ports;
 - v) LINX and Cargill agree to use a loader that is fit for grain loading purposes;
 - vi) Berth 29 would only be allocated for grain loading if there are 3 clear days of berth availability as this is how long it takes to load grain and this should not hold up other vessels or interfere with existing operations at Berth 29;
 - vii) Flinders Ports and Cargill will work closely to identify periods when the berth will be available for 3 days; and
 - viii) As far as possible, a grain ship must not follow a mineral sands vessel as the loader and berth will need to be washed down properly.

31. The above agreement is the only potential time that a vessel berthing for grain loading could be moved off the berth for another vessel. It stems from the agreement made with Cargill in 2015 given the dust, health and environmental issues of loading grain in a minerals-based precinct and the time taken to load grain using a loader that was ill-equipped to do so and adversely affected the overall efficiency of loading and unloading operations at the port.
32. As far as Flinders Ports is aware however, the above situation never occurred.

Does Flinders Ports bundle its services with services offered by Flinders Logistics or Flinders Warehousing & Distribution Pty Ltd? And, if it does, please identify which of the bundled services (if any) are 'regulated services' as defined by the Maritime Services (Access) Act 2000 (SA)?

(h) If the answer to question (g) is yes, is a discount offered for these bundles, compared to buying the services separately, and are businesses in downstream markets that are not a part of the Flinders group able to provide their own services in a bundle with services offered by Flinders Ports with equivalent discount arrangements?

33. From time to time, FLOG or FWD may seek to bundle the services it provides to customers with "regulated services" that the customer requires from Flinders Ports. This is often a result of a customer requesting a single price and single point of contact.
34. The prices charged by Flinders Ports to customers for its regulated services are the same regardless of the identity of the stevedore. Accordingly, LINX and other stevedores can and do bundle their own services with the regulated services that their customers require and acquire from Flinders Ports.
35. It is a matter for each stevedore as to whether to provide that bundle of services to their customer at a discount to normal rates. Notably, for the reasons set out in our previous submissions, the services provided by Flinders Ports to stevedores are not 'regulated services' as defined by the *Maritime Services (Access) Act 2000* (SA).

Annexure A

Ship	Start	Fwd Dft	Aft Dft	FL	LL	LOA	Beam	B2B	From	To	Berthing Tugs	Remarks	Ship Class
ALPHA BULKER	11/01/2016 17:39	3.47	6.49	11/01/2016 17:39	11/01/2016 18:18	177	28.4	150	IH 20 BTH ADL	IH 29 BTH ADL	FROM: 2T TO: 2T		Dry Bulk
ALPHA BULKER	15/01/2016 20:30	9.7	9.8		15/01/2016 20:30	177	28.4	150	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA / CR	Dry Bulk
BERGE HAKODATE	15/01/2016 22:15	5.4	6.2	16/01/2016 0:45	16/01/2016 1:05	180	30	153	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		General Cargo, nes
BERGE HAKODATE	20/01/2016 1:02	9.84	9.79		20/01/2016 1:02	180	30	153	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR / TIDAL	General Cargo, nes
CSL THEVENARD	30/01/2016 10:20	8.9	8.9	30/01/2016 12:18	30/01/2016 12:36	184.5	32.2	143	PBG ADL	IH 29 BTH ADL	TO: 2T	2000hp BTH / Head-in PST / Enters 2nd (behind PCC)	General Cargo, nes
CSL THEVENARD	30/01/2016 23:56	8.8	8.9	31/01/2016 0:43	31/01/2016 1:02	184.5	32.2	143	IH 29 BTH ADL	IH H BTH ADL	FROM: 1T TO: 2Z / 3T	CR / 2000hp BTH / Move to load berth	General Cargo, nes
AWASSI EXPRESS	31/01/2016 3:17	5.9	7.9	31/01/2016 5:27	31/01/2016 5:49	181.5	31.4	145.6	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	Trudy temp mobile 0498 208 152	Livestock Carrier
AWASSI EXPRESS	3/02/2016 7:16	7.4	7.8		3/02/2016 7:16	181.5	31.4	145.6	IH 29 BTH ADL	PBG ADL	FROM: 2T	Trudy temp mobile 0498 208 152 / Compass adj req**	Livestock Carrier
ALPHA MELODY	5/02/2016 9:28	4.5	7.2	5/02/2016 11:20		225	32.26	191.5	PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T	Oversize vessel / TA CR / K Clear / Daylight only / SB TO DO !!!!!!!	General Cargo, nes
ALPHA MELODY	10/02/2016 7:36	7.47	8.54		10/02/2016 7:36	225	32.26	191.5	IH 29 BTH ADL	ANCH01 ADL	FROM: 2Z / 3T	Oversize Vessel / TA CR / Daylight only	General Cargo, nes
CRYSTALGATE	10/02/2016 13:22	5.7	6.1	10/02/2016 15:29	10/02/2016 15:47	169.4	27.2	143.8	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
CRYSTALGATE	12/02/2016 2:30	7.8	8.3		12/02/2016 2:30	169.4	27.2	143.8	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
RED FIN	12/02/2016 8:30	5.2	6.7	12/02/2016 10:37	12/02/2016 11:02	190	32.26	163	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR	Dry Bulk
RED FIN	16/02/2016 8:56	9.4	9.4		16/02/2016 8:56	190	32.26	163	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR TA	Dry Bulk
SBI TANGO	16/02/2016 10:15	5.23	6.74	16/02/2016 13:00	16/02/2016 13:20	200	32.28		ANCH01 ADL	IH 29 BTH ADL	TO: 2Z		General Cargo, nes
SBI TANGO	20/02/2016 14:38	8.04	8.5		20/02/2016 14:38	200	32.28		IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
JOBST OLDENDORFF	23/02/2016 1:12	9.4	9.4	23/02/2016 4:05	23/02/2016 4:38	199.9	32.24	171	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	CR	General Cargo, nes
JOBST OLDENDORFF	24/02/2016 3:05	9.2	9.5		24/02/2016 3:05	199.9	32.24	171	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	General Cargo, nes
THREE RIVERS	27/02/2016 17:03	5.75	8.2	27/02/2016 19:20	27/02/2016 19:34	190	23.6		PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T	BTH 800 kW / CR / Mineral Sands	Dry Bulk
THREE RIVERS	29/02/2016 0:05	7.71	8.46		29/02/2016 0:05	190	23.6		IH 29 BTH ADL	PBG ADL	FROM: 1T	BTH 800 kW / CR / Mineral Sands	Dry Bulk
FURNESS ST KILDA	29/02/2016 20:15	5.45	6.44	29/02/2016 22:45	29/02/2016 23:44	200	32.24	171.4	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / K Clear / spring line length approx 200mtrs / enter once CONTSHIP Alongside.	General Cargo, nes
FURNESS ST KILDA	1/03/2016 8:15			1/03/2016 8:15	1/03/2016 8:45	200	32.24	171.4	IH 29 BTH ADL	IH 29 BTH ADL			General Cargo, nes
FURNESS ST KILDA	5/03/2016 2:05	10	10		5/03/2016 2:05	200	32.24	171.4	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	General Cargo, nes
BALTIC HARE	8/03/2016 2:02	9.48	9.52	8/03/2016 4:40	8/03/2016 4:55	175.5	29.4	148	PBG ADL	IH 29 BTH ADL	TO: 2T	TA CR / Fresh water to be connected on arrival as well as additional hoses for cargo.	Dry Bulk
BALTIC HARE	11/03/2016 13:53		6.2		11/03/2016 13:53	175.5	29.4	148	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
KUNIANG	11/03/2016 14:10	7.7	9.8	11/03/2016 17:39	11/03/2016 18:00	160	24.1	131	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	TA CR / Position Requested Bow at 145m Bridge at 14m / fresh water required	General Cargo, nes
KUNIANG	12/03/2016 19:04		9.82		12/03/2016 19:04	160	24.1	131	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	General Cargo, nes
EDWINE OLDENDORFF	12/03/2016 20:53	5.55	7.1	12/03/2016 23:17	12/03/2016 23:42	180	30	154.9	PBG ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
EDWINE OLDENDORFF	16/03/2016 20:02	10.3	10.5		16/03/2016 20:02	180	30	154.9	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	Dry Bulk
NORD HYDRA	23/03/2016 15:32	5.5	7.1	23/03/2016 17:39	23/03/2016 17:58	225	32.24	194	PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T	TA / CR / K Clear / Oversize / Panamax / Daylight Only	Dry Bulk
NORD HYDRA	25/03/2016 8:36	7.25	8.6		25/03/2016 8:36	225	32.24	194	IH 29 BTH ADL	PBG ADL	FROM: 2Z / 3T	TA / CR / Oversize / Panamax / Daylight Only	Dry Bulk
AEOLOS	26/03/2016 0:20	5.02	6.75	26/03/2016 3:22	26/03/2016 3:40	199.9	32.26		ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / K Clear / must be alongside for 0500 start	Dry Bulk
AEOLOS	28/03/2016 8:18			28/03/2016 8:18	28/03/2016 8:42	199.9	32.26		IH 29 BTH ADL	IH 29 BTH ADL		Fleet 12m astern LINES LAUNCH REQUIRED	Dry Bulk
AEOLOS	31/03/2016 20:35	10.5	10.5		31/03/2016 20:35	199.9	32.26		IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR / tidal	Dry Bulk
NORDIC NANJING	1/04/2016 1:20	6.6	8.1	1/04/2016 3:32	1/04/2016 3:54	180	30	149.6	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
NORDIC NANJING	2/04/2016 20:50	9.45	9.75		2/04/2016 20:50	180	30	149.6	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	Dry Bulk
OCEAN LEADER	3/04/2016 17:34	4.4	7.08	3/04/2016 19:41	3/04/2016 20:05	189.4	32.25		ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR	Dry Bulk
OCEAN LEADER	7/04/2016 9:40	6.3	7.6		7/04/2016 9:40	189.4	32.25		IH 29 BTH ADL	PBG ADL	FROM: 2T	CR	Dry Bulk
BRAHMAN EXPRESS	7/04/2016 22:07	5.5	6.2	7/04/2016 22:07	7/04/2016 22:35	133.4	15.85	15	IH 27 BTH ADL	IH 29 BTH ADL	FROM: 2T TO: 2T	BTH 680 HP / First visit / Cattle ship / BTH operational on arrival but master advises prone to tripping / shifting back to load berth	Livestock Carrier
BRAHMAN EXPRESS	8/04/2016 20:00	5.7	6		8/04/2016 20:00	133.4	15.85	15	IH 29 BTH ADL	PBG ADL	FROM: 2T	BTH 680 HP / First visit / Cattle ship / BTH operational on arrival but master advises prone to tripping	Livestock Carrier
DL JASMINE	9/04/2016 17:30	8.08	8.48	9/04/2016 19:50	9/04/2016 20:15	180	30	149.5	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
DL JASMINE	11/04/2016 2:28	9.38	9.38		11/04/2016 2:28	180	30	149.5	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	Dry Bulk

MAYSORA	11/04/2016 22:31	6.1	8.3	12/04/2016 0:35	12/04/2016 1:10	195.7	28.4	153	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z	BTH Not Operational / CR / K Clear	Livestock Carrier
MAYSORA	16/04/2016 9:30	8	8.5		16/04/2016 9:30	195.7	28.4	153	IH 29 BTH ADL	PBG ADL	FROM: 2Z	CR / Bth Not Operational	Livestock Carrier
ECO WILDFIRE	19/04/2016 10:02	4.82	6.91	19/04/2016 10:02	19/04/2016 10:43	179.9	28.4	153	IH 20 BTH ADL	IH 29 BTH ADL	FROM: 2T TO: 2T		Dry Bulk
ECO WILDFIRE	22/04/2016 16:12	8.8	9.8		22/04/2016 16:12	179.9	28.4	153	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
AZALEA K	24/04/2016 20:44	3.76	5.65	24/04/2016 22:26	24/04/2016 22:56	170.7	27	145.3	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	must be alongside for 0700	Dry Bulk
AZALEA K	1/05/2016 10:00	9.25	9.9		1/05/2016 10:00	170.7	27	145.3	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR / Tidal / Compass adjustment required	Dry Bulk
AL MESSILAH	18/05/2016 6:01	7.4	8.4	18/05/2016 7:53	18/05/2016 8:15	185.9	32	29	PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T		Livestock Carrier
AL MESSILAH	19/05/2016 23:10	8.1	8.4		19/05/2016 23:10	185.9	32	29	IH 29 BTH ADL	PBG ADL	FROM: 2T		Livestock Carrier
LISBON TRADER	20/05/2016 0:30	4.1	7.1	20/05/2016 1:58	20/05/2016 2:17	179.4	28	162.7	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	Head in PST	General Cargo, nes
LISBON TRADER	20/05/2016 21:02	4.2	7.2		20/05/2016 21:02	179.4	28	162.7	IH 29 BTH ADL	PBG ADL	FROM: 2T	Swing on dept	General Cargo, nes
SWIFTNES	20/05/2016 23:32	4.73	6.35	21/05/2016 1:28	21/05/2016 1:47	177	30	153	PBG ADL	IH 29 BTH ADL	TO: 2T	See Pilots Notes	Dry Bulk
SWIFTNES	22/05/2016 11:29	6.26	7.01		22/05/2016 11:29	177	30	153	IH 29 BTH ADL	PBG ADL	FROM: 2T	See Pilots Notes	Dry Bulk
MERLIN ARROW	22/05/2016 13:00	8.7	8.95	22/05/2016 14:50	22/05/2016 15:03	199.7	32.2	168.2	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / Bth 2176hp + schilling rudder / K Clear	General Cargo, nes
MERLIN ARROW	25/05/2016 4:12	9	9.03		25/05/2016 4:12	199.7	32.2	168.2	IH 29 BTH ADL	PBG ADL	FROM: 2T	Cr / Bth 2176hp + schilling rudder	General Cargo, nes
AFRICAN SPOONBILL	29/05/2016 1:00	4.43	7.52	29/05/2016 3:18	29/05/2016 3:45	199.9	32.26	169.9	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	CR / K Clear / alongside by 0500 29/5 / Bow 182 bridge 12m	General Cargo, nes
AFRICAN SPOONBILL	31/05/2016 5:40	8.75	9.09		31/05/2016 5:40	199.9	32.26	169.9	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR	General Cargo, nes
ITHAKI	1/06/2016 14:52	6.5	6.75	1/06/2016 16:26	1/06/2016 17:21	180	29.8		ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
ITHAKI	3/06/2016 14:57	10.4	10.4		3/06/2016 14:57	180	29.8		IH 29 BTH ADL	PBG ADL	FROM: 2T	TA / CR / WINDOW CLOSES 1717 with tides - 20 cm	Dry Bulk
ATLANTIC PENDANT	3/06/2016 16:10	4.4	6.7	3/06/2016 18:00	3/06/2016 18:14	143.2	22.8	125	ANCH01 ADL	IH 29 BTH ADL	TO: 1T	500 Kw BTH / PST / ***HEAD IN***	General Cargo, nes
ATLANTIC PENDANT	4/06/2016 8:30	4.4	6.7		4/06/2016 8:30	143.2	22.8	125	IH 29 BTH ADL	PBG ADL	FROM: 1T	500 Kw BTH / Swing on departure	General Cargo, nes
NADA	4/06/2016 16:30	8.27	9.28	4/06/2016 18:40	4/06/2016 19:17	201.4	32.24	175	PBG ADL	IH 29 BTH ADL	TO: 2Z	1360 Hp BTH / TA CR / K berth clear	Livestock Carrier
NADA	6/06/2016 7:19	9.2	9.2		6/06/2016 7:19	201.4	32.24	175	IH 29 BTH ADL	PBG ADL	FROM: 2T	1360 Hp BTH / CR / TA	Livestock Carrier
MIMASAKA	11/06/2016 2:02	3.3	5.1	11/06/2016 3:57	11/06/2016 4:10	127.7	19.6	108.1	PBG ADL	IH 29 BTH ADL	TO: 1T	BTH 450 KW / Ships cranes seaward side	General Cargo, nes
MIMASAKA	12/06/2016 18:20	8.49	9.02		12/06/2016 18:20	127.7	19.6	108.1	IH 29 BTH ADL	PBG ADL	FROM: 1T	BTH 450 KW	General Cargo, nes
THOR INFINITY	20/06/2016 1:30	3.39	6.72	20/06/2016 4:17	20/06/2016 4:48	190	32.26	162.1	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	Loading mineral sands	Dry Bulk
THOR INFINITY	22/06/2016 17:23	7.19	9.76		22/06/2016 17:23	190	32.26	162.1	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR / TA	Dry Bulk
NORDIC NANJING	24/06/2016 13:03	4.95	6.2	24/06/2016 15:05	24/06/2016 15:25	180	30	149.6	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z		Dry Bulk
NORDIC NANJING	28/06/2016 7:08	10.1	10.1		28/06/2016 7:08	180	30	149.6	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	Dry Bulk
THORCO RANGER	28/06/2016 8:53	5	5.9	28/06/2016 10:48	28/06/2016 11:08	161.5	25.23	145	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	Ships crains on seaward side.	General Cargo, nes
THORCO RANGER	1/07/2016 0:15	7.55	8.7		1/07/2016 0:15	161.5	25.23	145	IH 29 BTH ADL	PBG ADL	FROM: 2T	Bth 750kw - BTH Tripped on arrival no explanation yet. / Bow thruster fully operational.	General Cargo, nes
DESERT SERENITY	5/07/2016 7:43	4.6	6.6	5/07/2016 9:55		190	32.26	164	PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / Freshwater Req	Dry Bulk
DESERT SERENITY	9/07/2016 16:39	8.45	8.45		9/07/2016 16:39	190	32.26	164	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR	Dry Bulk
WESTGATE	22/07/2016 2:50	3.5	5.8	22/07/2016 4:58	22/07/2016 5:35	169.4	27.2	144	PBG ADL	IH 29 BTH ADL	TO: 2T	LET TUGS GO AT EARLIEST CONVINIENCE	General Cargo, nes
WESTGATE	28/07/2016 21:40	9.54	9.81		28/07/2016 21:40	169.4	27.2	144	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	General Cargo, nes
EDWARD OLDENDORFF	29/07/2016 12:00	5.51	6.89	29/07/2016 14:09	29/07/2016 14:30	180	30	155	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	bow at 162m and her bridge at 7m. Her BTB is 155m	Container/Bulk/Cargo
EDWARD OLDENDORFF	31/07/2016 15:30	9.39	10		31/07/2016 15:30	180	30	155	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA / CR / PM Launch Crew	Container/Bulk/Cargo
ORIENTAL SPIRIT	1/08/2016 6:42	3.1	5.3	1/08/2016 8:50	1/08/2016 9:05	139.9	25	115	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		General Cargo, nes
ORIENTAL SPIRIT	2/08/2016 14:24	6.14	7		2/08/2016 14:24	139.9	25	115	IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
BBC AFRICA	2/08/2016 17:35	4.3	6.1	2/08/2016 18:50	2/08/2016 19:00	119.8	20.2	108	ANCH01 ADL	IH 29 BTH ADL	TO: 1T	Bth 500kw / berthing head in	General Cargo, nes
BBC AFRICA	3/08/2016 7:02	5	6.05		3/08/2016 7:02	119.8	20.2	108	IH 29 BTH ADL	PBG ADL	FROM: 2T	Bth Failed on Arrival / Swing on departure	General Cargo, nes
KUNIAN	5/08/2016 21:07	3.7	6.45	5/08/2016 22:58	5/08/2016 23:25	160	24.1	131	PBG ADL	IH 29 BTH ADL	TO: 2T		General Cargo, nes
KUNIAN	8/08/2016 2:37	8.8	8.9		8/08/2016 2:37	160	24.1	131	IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
ALBERTITO	9/08/2016 19:10	4.1	5.7	9/08/2016 21:12	9/08/2016 21:40	169.3	27.2	143.7	PBG ADL	IH 29 BTH ADL	TO: 2T	bow at 160m and her bridge at 16m. Her BTB is 143.7m.	General Cargo, nes
ALBERTITO	10/08/2016 10:50	5.77	5.79		10/08/2016 10:50	169.3	27.2	143.7	IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
CAPE KNOX	10/08/2016 15:00	4.78	7.4	10/08/2016 17:40	10/08/2016 18:02	169.3	27.2	144	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		General Cargo, nes
CAPE KNOX	13/08/2016 8:07	8.32	8.6		13/08/2016 8:07	169.3	27.2	144	IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
AFRICAN WAGTAIL	16/08/2016 0:53	3.8	6.3	16/08/2016 3:00	16/08/2016 3:30	197	32.26	169	PBG ADL	IH 29 BTH ADL	TO: 2T	CR / K berth clear / bow at 180m	General Cargo, nes
AFRICAN WAGTAIL	18/08/2016 2:37	6.5	7.7		18/08/2016 2:37	197	32.26	169	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR	General Cargo, nes
YUNNAN	18/08/2016 12:30	9.4	9.6	18/08/2016 14:25	18/08/2016 14:48	180	30	153	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	TA CR / Sulphur / Fresh Water Required	Dry Bulk
YUNNAN	21/08/2016 21:09	6.1	6.6		21/08/2016 21:09	180	30	153	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
ZAMBESI	27/08/2016 8:03	4.7	6.65	27/08/2016 10:21	27/08/2016 10:40	180	30	148	PBG ADL	IH 29 BTH ADL	TO: 2T	Steering issues, TA required unless issue fixed	Dry Bulk
ZAMBESI	28/08/2016 14:42	4.2	6.7		28/08/2016 14:42	180	30	148	IH 29 BTH ADL	ANCH01 ADL	FROM: 2T	TA CR (rudder indicator issue) / To anchor & await 2nd cargo	Dry Bulk

SBI ZEUS	30/08/2016 0:56	5	6.7	30/08/2016 2:40	30/08/2016 3:05	200	32.25	171	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR "K" Clear / bow at 182m & bridge at 11m	Dry Bulk
SBI ZEUS	1/09/2016 18:01	9.45	9.55		1/09/2016 18:01	200	32.25	171	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR / TA	Dry Bulk
ZAMBESI	5/09/2016 2:00	6.3	6.7	5/09/2016 4:26	5/09/2016 4:47	180	30	148	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	TA required Steering issues	Dry Bulk
ZAMBESI	7/09/2016 18:08	10.1	10.1		7/09/2016 18:08	180	30	148	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR (Steering issues resolved) / (Working on - 25 cm) window closes 2030	Dry Bulk
FRIEDERIKE	9/09/2016 12:54	5.2	6.4	9/09/2016 14:51	9/09/2016 15:14	190	32.26		PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR	Dry Bulk
FRIEDERIKE	15/09/2016 17:36	9.67	10.1		15/09/2016 17:36	190	32.26		IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR	Dry Bulk
TIAN LU	18/09/2016 17:37	5.65	7.7	18/09/2016 19:19	18/09/2016 19:46	190	28.5		PBG ADL	IH 29 BTH ADL	TO: 2T	CR Head In PST	General Cargo, nes
TIAN LU	19/09/2016 22:50	5.45	7.45		19/09/2016 22:50	190	28.5		IH 29 BTH ADL	ANCH01 ADL	FROM: 2T	CR / Swing on Departure / To anchor to prepare holds prior sea passage	General Cargo, nes
ECO SPITFIRE	20/09/2016 0:27	7.6	8.04	20/09/2016 2:28	20/09/2016 2:46	180	28.2	155.4	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z		Dry Bulk
ECO SPITFIRE	21/09/2016 9:30	8.43	8.95		21/09/2016 9:30	180	28.2	155.4	IH 29 BTH ADL	PBG ADL	FROM: 2Z		Dry Bulk
IKAN JENAHAR	24/09/2016 18:30	4.62	6.37	24/09/2016 20:30	24/09/2016 21:00	171.6	27	145.2	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
IKAN JENAHAR	26/09/2016 17:15	6.67	7.01		26/09/2016 17:15	171.6	27	145.2	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
DENSA HAWK	27/09/2016 13:00	4.12	6.65	27/09/2016 15:14	27/09/2016 15:40	187	27.8	154.4	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		General Cargo, nes
DENSA HAWK	30/09/2016 21:00	6.8	6.94		30/09/2016 21:00	187	27.8	154.4	IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
WEAVER ARROW	4/10/2016 6:00	7.35	8.35	4/10/2016 8:47	4/10/2016 9:14	199.7	32.2	169.7	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / K CLEAR / BTH 2145 HP + schilling rudder	General Cargo, nes
WEAVER ARROW	6/10/2016 3:50	6.53	7.82		6/10/2016 3:50	199.7	32.2	169.7	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR / BTH 2145 HP + schilling rudder	General Cargo, nes
BALTIC COVE	17/10/2016 2:37	4.2	6.34	17/10/2016 4:24	17/10/2016 4:50	180	30		PBG ADL	IH 29 BTH ADL	TO: 2T		General Cargo, nes
BALTIC COVE	20/10/2016 3:47	8.62	9		20/10/2016 3:47	180	30		IH 29 BTH ADL	PBG ADL	FROM: 2T		General Cargo, nes
SIARD	21/10/2016 1:03	3.6	5.8	21/10/2016 3:22	21/10/2016 3:43	143.2	22.8	124.3	ANCH01 ADL	IH 29 BTH ADL	TO: 1T	700kw BTH / cranes on port side	General Cargo, nes
SIARD	22/10/2016 21:08	7.9	8.2		22/10/2016 21:08	143.2	22.8	124.3	IH 29 BTH ADL	PBG ADL	FROM: 1T	700kw BTH	General Cargo, nes
MARINA L	16/11/2016 12:25	3.37	5.64	16/11/2016 14:30	16/11/2016 14:55	169.4	27.2	144	PBG ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
MARINA L	18/11/2016 2:44	4.82	6.03		18/11/2016 2:44	169.4	27.2	144	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
DENSA SEAL	19/11/2016 21:16	8.45	8.95	19/11/2016 23:24	19/11/2016 23:44	187	27.8	154.1	PBG ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / working on 15cm down	General Cargo, nes
DENSA SEAL	21/11/2016 6:55	10.2	10.2		21/11/2016 6:55	187	27.8	154.1	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR -35CM	General Cargo, nes
INASE	24/11/2016 15:48	3.4	6	24/11/2016 18:00	24/11/2016 18:20	169.3	27.2	143.7	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
INASE	25/11/2016 21:10	5.64	7.39		25/11/2016 21:10	169.3	27.2	143.7	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
DENSA PUMA	25/11/2016 22:42	4.25	6.35	26/11/2016 1:03	26/11/2016 1:28	187	27.8	154.1	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
DENSA PUMA	28/11/2016 1:47	8.98	9.58		28/11/2016 1:47	187	27.8	154.1	IH 29 BTH ADL	PBG ADL	FROM: 2T	TA	Dry Bulk
AFRICAN GRIFFON	2/12/2016 8:08	4.8	6.5	2/12/2016 10:28	2/12/2016 11:12	200	32.24		PBG ADL	IH 29 BTH ADL	TO: 2Z	CR / K Clear	Dry Bulk
AFRICAN GRIFFON	5/12/2016 8:25	9.85	9.92		5/12/2016 8:25	200	32.24		IH 29 BTH ADL	PBG ADL	FROM: 2T	TA CR (working -15cm tide)	Dry Bulk
MERLIN ARROW	5/12/2016 11:00	8.15	8.25	5/12/2016 11:40	5/12/2016 12:10	199.7	32.2	168.2	IH 18 BTH ADL	IH 29 BTH ADL	FROM: 2T TO: 2T	CR / 2176hp BTH / Schilling Rudder / 'K' Clear	General Cargo, nes
MERLIN ARROW	7/12/2016 5:48	9.2	9.25		7/12/2016 5:48	199.7	32.2	168.2	IH 29 BTH ADL	PBG ADL	FROM: 1T	CR / 2176hp BTH / Schilling Rudder / Window opens 0353 - 10 cm	General Cargo, nes
THORCO RANGER	13/12/2016 17:51	5	6.1	13/12/2016 19:41	13/12/2016 20:04	161.5	25.23	145	PBG ADL	IH 29 BTH ADL	TO: 1T	750 kw BTH	General Cargo, nes
THORCO RANGER	15/12/2016 16:41	7.05	8.05		15/12/2016 16:41	161.5	25.23	145	IH 29 BTH ADL	PBG ADL	FROM: 1T	750 kw BTH	General Cargo, nes
SOHO MANDATE	15/12/2016 22:10	4.57	6.93	16/12/2016 0:08	16/12/2016 0:40	199.9	32.2	171.6	ANCH01 ADL	IH 29 BTH ADL	TO: 2Z / 3T	CR / K Clear / Shore Gangway Not Req as now not loading hold #1	General Cargo, nes
SOHO MANDATE	18/12/2016 8:08	7.07	9.29		18/12/2016 8:08	199.9	32.2	171.6	IH 29 BTH ADL	PBG ADL	FROM: 2T	CR / K Clear	General Cargo, nes
AMERICAN BULKER	18/12/2016 9:30	5.13	6.33	18/12/2016 11:30	18/12/2016 11:55	179.8	30.4	152.3	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
AMERICAN BULKER	20/12/2016 3:58	7.21	7.63		20/12/2016 3:58	179.8	30.4	152.3	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk
KING WHEAT	20/12/2016 8:00	9.72	9.91	20/12/2016 10:15	20/12/2016 10:38	180	28.19	155.4	PBG ADL	IH 29 BTH ADL	TO: 2T	TA / CR /Working -10cm below	Container/Bulk/Cargo
KING WHEAT	23/12/2016 19:50	4.43	6.21		23/12/2016 19:50	180	28.19	155.4	IH 29 BTH ADL	PBG ADL	FROM: 2T	ENSURE AMSA DETENTION LIFTED	Container/Bulk/Cargo
PLOVER ARROW	25/12/2016 7:03	8.7	8.7	25/12/2016 9:08	25/12/2016 9:20	199.7	32.2	169.7	ANCH01 ADL	IH 29 BTH ADL	TO: 2T	BTH 2100hp / CR / K clear	General Cargo, nes
PLOVER ARROW	27/12/2016 4:52	8.5	8.8		27/12/2016 4:52	199.7	32.2	169.7	IH 29 BTH ADL	PBG ADL	FROM: 1T	CR / 2100hp	General Cargo, nes
YANGTZE OASIS	27/12/2016 13:00	6.45	6.67	27/12/2016 15:00	27/12/2016 15:30	179.8	29.1	151	ANCH01 ADL	IH 29 BTH ADL	TO: 2T		Dry Bulk
YANGTZE OASIS	29/12/2016 19:08	7.81	8.16		29/12/2016 19:08	179.8	29.1	151	IH 29 BTH ADL	PBG ADL	FROM: 2T		Dry Bulk