IFCBAA
INTERNATIONAL FORWARDERS & CUSTOMS BROKERS ASSOCIATION OF AUSTRALIA

IFCBAA Submission

16 February 2026 (11 pages)

Responding to:
National Transport Commission
Consultation on Updated National Voluntary Guidelines for Landside Stevedore Charges and Empty Container Park Charges (issued 3 February 2026)

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Introduction

The International Forwarders and Customs Brokers Association of Australia (IFCBAA) welcomes the opportunity to provide input to the National Transport Commission's consultation on proposed updates to the National Voluntary Guidelines for Landside Stevedore Charges, including the proposed expansion of the Guidelines to empty container parks (ECPs).

The International Forwarders and Customs Brokers Association of Australia (IFCBAA) is the not-for-profit independent and influential voice for international freight forwarders, licenced customs brokers and operators of premises licenced by border agencies in Australia, with this industry cohort servicing close to 72% of Australia's import and export trade, by shipment volume across both air cargo and sea cargo modes.

IFCBAA operates as a not-for-profit organisation for the benefit of members and offer a wide range of services, products and events, including leading edge professional development, training, compliance, industry advocacy, knowledge sharing, forums, conferences and networking opportunities.

We represent our members in international trade and advocate with Government agencies and other relevant industry organisations on behalf of our members.

IFCBAA strongly supports reforms that improve **transparency**, **consistency**, **consultation** and **accountability** in the introduction and escalation of landside charges, particularly in circumstances where supply chain users have limited bargaining power or ability to influence terminal choice.

The release of the NTC consultation paper is timely and coincides with IFCBAA's Review and Recommendation package, prepared in response to the ACCC Container Stevedoring Monitoring Report issued on 12 December 2025. Many of the questions raised in the NTC consultation are already substantially addressed in IFCBAA's Review and Recommendation package.

Response to Consultation Questions

Question 1

What are your views on the proposed changes to align price changes to 1 January each year?

IFCBAA supports the proposal to align price changes to 1 January each year, noting that any increases should be introduced only where clearly justified and not simply because an annual adjustment is permitted. A single annual pricing window would improve predictability and administrative efficiency for freight forwarders, licensed customs brokers, transport operators and cargo owners.

Frequent or irregular price changes create uncertainty, complicate contract management, and increase downstream costs for importers and exporters. Annual alignment would provide a clearer framework for planning and budgeting across the supply chain. It would also reduce the burden on end-of-line stakeholders, who are often required to explain unexpected cost increases to clients and importers despite having no control over the charges. Transport operators and freight forwarders are frequently placed in the position of delivering "bad news," which is exacerbated when rate increases occur with little warning or consistency.

Question 2

Do you foresee any opportunities or challenges for stevedores implementing these changes?

IFCBAA considers that annual alignment presents an opportunity for stevedores to adopt a more structured, predictable and transparent approach to cost recovery and industry consultation. A single annual pricing cycle should support clearer communication of proposed changes and reduce the disruption caused by multiple or ad hoc adjustments throughout the year.

However, implementation may present challenges where stevedores seek to retain flexibility to introduce new charges or increase fees outside the annual cycle. IFCBAA emphasises that any exceptions should be limited, clearly justified, and subject to robust and genuine consultation. Consultation must be meaningful rather than procedural, particularly given the market power imbalance that often exists between stevedores and downstream supply chain users.

Stevedores play a critical role in Australia's trade infrastructure and require sustainable investment capacity. At the same time, the persistent escalation of landside charges, in the absence of effective competitive discipline, reinforces the need for stronger frameworks to ensure transparency, accountability and fair outcomes for industry participants. IFCBAA acknowledges that stevedores operate as critical trade infrastructure providers, often within global corporate structures. Terminal operators may face international commercial pressures, including offshore investment expectations, technology and capital expenditure requirements, and overseas head office return targets. These upstream drivers may not always be visible to Australian supply chain users but may contribute to pricing decisions at the port interface.

Question 3

Is the amount of information stevedores are requested to provide appropriate?

IFCBAA supports the information requirements proposed in the updated Guidelines. Increased transparency around:

- the rationale for price changes
- the cost drivers and service improvements claimed
- the investment or operational basis for charges

- with these being necessary to enable meaningful industry engagement.

IFCBAA notes that consultation must be substantive rather than procedural. Advance notice alone is insufficient if stakeholders are not provided with adequate information to understand and respond to proposed changes.

Question 4

Are the timeframes outlined for stevedore price change notification process appropriate?

IFCBAA considers the proposed notification timeframes (including a 60-day Notice of Intention and a 30-day Final Notice) to be appropriate minimum standards.

These timeframes provide industry participants with a reasonable opportunity to:

- assess impacts
- provide feedback
- adjust commercial arrangements

IFCBAA stresses that the effectiveness of these timeframes depends on whether consultation is genuine and whether stakeholder feedback is meaningfully considered before implementation. The process must not become a “tick-box” exercise or a fait accompli, where decisions are effectively finalised before industry has an opportunity to engage.

Question 5

What are your views on the proposed expansion of the National Voluntary Guidelines to empty container parks?

IFCBAA strongly supports the expansion of the Guidelines to include empty container parks.

Landside charges do not exist in isolation. Costs imposed at terminal gates increasingly flow through the broader port-interface ecosystem, including ECPs, depots and related service providers.

A narrow focus on stevedores alone risks cost shifting rather than addressing structural pricing pressures across the container supply chain. Landside charges introduced at the terminal gate do not exist in isolation. They flow through to, and are often replicated across, other critical nodes in the maritime logistics system, including Consolidation Freight Stations (CFS), container freight depots, empty container parks (ECPs), PONDUS container weighing facilities, and other sea freight interface service providers that operate within the port precinct and surrounding logistics corridors. These facilities form an essential part of the end-to-end import and export task, particularly for LCL consolidation movements, empty container management, and compliance-related processes such as weighing and receival controls.

IFCBAA therefore considers that any future voluntary or mandatory code intended to improve transparency, consultation, and pricing discipline in relation to landside charges must extend beyond stevedores alone. A narrow focus risks simply shifting cost recovery and price escalation to adjacent service providers within the port supply chain, rather than addressing the structural issue in a holistic manner.

Question 6

Do you foresee any opportunities or challenges in implementing the guidelines for empty container park charges?

The extension of the Guidelines to ECPs presents an important opportunity to improve transparency in an area where industry participants have raised concerns about:

- notification fees
- access charges
- limited consultation
- inconsistent practices across operators

There may be challenges because empty container parks operate in different ways, are run by a mix of large private logistics companies, specialized container operators, and subsidiaries of major shipping lines, and have varying levels of influence depending on the port or state. However, IFCBAA believes a consistent national approach is important, and ECP operators should be held to the same basic standards for advance notice, clear explanations of charges, and genuine consultation with industry.

Question 7

Is the amount of information empty container parks are requested to provide appropriate?

Yes. IFCBAA supports the proposed disclosure requirements for empty container park (ECP) operators. The information requested, including current and proposed charges, a clear explanation of the rationale for any changes, the service or investment outcomes expected, and supporting information where appropriate, represents a reasonable and proportionate minimum standard.

ECP-related charges have become an increasingly significant component of overall container logistics costs, and industry participants often have limited ability to avoid or negotiate these fees due to the operational necessity of using particular facilities within the port precinct. Greater transparency is therefore essential to ensure that pricing changes are understood, justifiable, and subject to meaningful consultation.

In IFCBAA's view, these disclosure requirements will assist freight forwarders, customs brokers, transport operators and cargo owners to better assess the impact of proposed changes, provide informed feedback, and communicate cost drivers more clearly to importers and exporters. Improved information sharing will also support consistency across jurisdictions and reduce the risk of unexpected or poorly explained cost increases being passed through the supply chain.

Question 8

Are the timeframes outlined for empty container price change notification process appropriate?

IFCBAA considers the proposed ECP notification timeframes (including Notice of Intention, feedback windows and Final Notice requirements) to be appropriate.

ECP charges can have immediate operational and commercial impacts across transport and depot networks. Minimum notice periods are essential to avoid abrupt cost imposition and to support supply chain planning.

Question 9

Are these definitions unambiguous and aligned with your understanding of the terms?

IFCBAA supports the inclusion of clear definitions in the Guidelines because defined terms help ensure the framework is applied consistently across Australia. Without agreed definitions, different stevedores, empty container parks, and regulators may interpret key concepts differently, which can undermine transparency and lead to uneven implementation between ports and jurisdictions.

However, IFCBAA also encourages the NTC to ensure that the definitions are not drafted too narrowly or in a way that fails to reflect how container logistics operates in practice. Landside charges and port-interface costs are often imposed through a network of interconnected service providers, including stevedores, empty container parks, depots, consolidation facilities, booking platforms, and other operators within the port precinct.

For example, if stevedore terminal access charges are subject to notice and consultation requirements, but similar "notification fees" or booking system charges imposed by an affiliated empty container park or depot are not clearly captured, the cost burden may simply shift to another part of the supply chain without improved transparency. Broad, practical definitions are therefore essential to ensure the Guidelines remain effective across the full port-interface ecosystem and reflect real-world operational arrangements.

Question 10

Are there any other terms which should be defined in the final guidelines?

IFCBAA considers that the final Guidelines should define not only stevedores and empty container parks, but also other key entities and charge types that operate at the port interface and increasingly contribute to overall landside cost escalation.

Freight forwarders, licenced customs brokers, transport operators and cargo owners interact with a broader network of service providers, including container freight stations, empty container facilities, and third-party booking and notification platforms. These operators often impose charges that are operationally unavoidable and commercially non-negotiable, similar in effect to terminal access charges.

For this reason, IFCBAA suggests the NTC consider defining additional terms such as:

- Consolidation Freight Stations (CFS): facilities where LCL cargo is unpacked or consolidated, often subject to access, handling or booking fees that flow through to SME importers and exporters.
- Depot access and booking platform charges: charges imposed through mandatory booking or notification systems used across terminals, depots and empty container parks, where industry participants have little choice but to comply.

To note, there are other discretionary service fees applied for services that may not be strictly regulatory in nature but are operationally imposed, such as container weighing or PONDUS-related fees.

Without clear and sufficiently broad definitions, there is a risk that pricing transparency obligations apply only to a narrow set of operators, while similar charges are introduced or increased by adjacent service providers outside the Guidelines. This could result in costs simply migrating through the supply chain rather than being addressed holistically.

IFCBAA therefore encourages definitions that reflect how port-interface services operate in practice, so the Guidelines remain effective and do not unintentionally leave gaps in coverage.

Question 11

Do you have any further concerns or issues with the proposed updated National Voluntary Guidelines?

IFCBAA's primary concern is that voluntary guidelines must lead to measurable outcomes. Without consistent adoption and accountability, voluntary frameworks risk becoming symbolic rather than effective.

IFCBAA remains concerned that existing competitive and commercial constraints have proven insufficient to prevent persistent escalation in landside charges and associated supply chain costs. This reinforces the need for a pathway that improves transparency, consultation, and accountability, while maintaining the operational and investment capacity of terminal operators.

Accordingly, IFCBAA believes the most effective way forward is a balanced and staged approach.

First, IFCBAA strongly supports meaningful industry-wide consultation as the foundation for reform. This should involve a structured roundtable or summit convened by government, bringing together stevedores, port authorities, shipping lines, cargo owners, freight forwarders, customs brokers, transport operators, and relevant regulators. The purpose of this engagement should be to establish a shared understanding of the key cost drivers, service expectations, infrastructure constraints, and pricing pressures across the port interface. Importantly, consultation must be substantive rather than procedural, with a genuine opportunity for all parties to contribute to practical and durable solutions.

Second, IFCBAA supports the development of an agreed and strengthened voluntary code governing landside price increases, consultation processes, and service standards. Voluntary guidelines can provide an important mechanism to improve notice periods, consistency, cost justification, and transparency around the introduction of new charges or increases to existing charges. Importantly, any strengthened voluntary framework should not apply to stevedores alone but should also capture the broader range of port-interface charges that affect supply chain users, including ECP notification fees, ancillary terminal charges, discretionary weighing fees, and CFS booking and access arrangements.

A strengthened code should include clear minimum requirements, consistent national application, measurable commitments, and transparent reporting obligations across these interconnected service providers.

Third, IFCBAA notes that should voluntary measures fail to deliver fair, transparent and effective outcomes within a reasonable timeframe, there must remain a clear pathway to more formal regulatory intervention. This could include a mandatory code or an enhanced oversight framework with appropriate enforcement powers. Regulation should not be the first resort, but it should remain available where market dynamics do not provide sufficient discipline and where supply chain users continue to face unilateral pricing outcomes with limited recourse.

In IFCBAA's view, this staged approach provides the most constructive pathway to achieving balanced outcomes, supporting stevedore sustainability and investment, while ensuring that industry participants are afforded transparency, consultation, and fair treatment in relation to landside charges that ultimately affect the cost and efficiency of Australia's international trade.

IFCBAA encourages the NTC and governments to treat landside pricing reform as a matter of national supply chain priority.

Conclusion

IFCBAA commends the NTC for progressing reforms that improve transparency, predictability and consultation in relation to landside stevedore and empty container park charges. These measures represent an important step toward addressing long-standing concerns about the escalation of port-interface costs and the limited ability of downstream supply chain participants to influence or mitigate these charges.

IFCBAA supports the proposed updates and encourages the development of a nationally consistent framework that delivers practical and measurable outcomes for Australia's international trade participants, including freight forwarders, customs brokers, transport operators, cargo owners, and ultimately importers and exporters.

IFCBAA also emphasises the importance of ensuring that consultation processes are genuine and that the Guidelines are broad enough to reflect how port-related service providers operate together in practice, so that transparency and accountability apply across the wider container logistics supply chain.

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On behalf of IFCBAA