

THE KANDLA PORT STEAMSHIP AGENTS ASSOCIATION 6, 2 nd Floor, Gandhidham Chamber of Commerce & Indus. Building, Sector 8, Gandhidham. Tel: 02836-221737 Fax: 02836 – 234680.	KANDLA STEVEDORES' ASSOCIATION LTD. 10, Sevasadan-1, New Kandla – 370 210 Tel: 02836-220453 Fax: 02836-231687	KANDLA CUSTOM BROKERS ASSOCIATION 8, 2 nd Floor, Gandhidham Chamber of Commerce & Industries Building, Sector – 8, Gandhidham. Tel: 02836 – 227435/231004 Fax:02836 – 231143
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Date : 6th April, 2022

URGENT

The Traffic Manager,
 Deendayal Port Authority,
 P&C Building,
 New Kandla.

Dear Sir,

Subject : Urgent Requirement for Revision / Fine Tuning of existing Berthing Policy based on increased daily output/s and evolving Exim Trade Dynamics - Reg.

Reference : Circular No. TF/SH/Berthing Policy/Corresp/2019-II/882 dated 05.04.2021.

We wish to draw your kind attention to the above subject matter as also to the referred circular pertaining to the existing Berthing Policy.

In this regard, we wish to inform you and as you are aware the Berthing Policy is considered to be flexible in terms of addressing the changing requirements, be it in terms of the changing daily output scenarios for certain cargoes and/or the fast changing Exim trade environment, whereby the Berthing Policy is to evolve suitably, duly capturing the changed or expected impact going forward.

Keeping the above in mind, we are hereunder suggesting certain revisions in the existing Berthing Policy with a view towards fine tuning the same so as to align it suitably as per the changing requirements of the trade, with a request to kindly examine and implement the same at the very earliest.

1. Under (I) General Policy - Dry Cargo (v) General Export/Import Vessels :

Currently 05 Berths are earmarked for General Export / Import Vessels. However, looking to the trends in the Exim traffic, there is an urgent need to enhance the earmarked Berths under this category to 06 Berths.

Furthermore, in order to maintain a self-balancing mechanism within this group as also to address the infrastructure bottlenecks in terms of traffic snarls / optimal utilization of storage space etc. we would suggest that instead of following a common seniority from amongst the General Import / Export Vessels, 03 (Three) Berths be earmarked for Import Vessels and 03 (Three) Berths for Export Vessels totalling 06 (Six) Berths, with these Vessels being accommodated as per their order of seniority in each Import and Export queue. However, in absence of either an Import or Export Vessel being available, the senior most Vessel in the general category group be accommodated so as to

Cont.-2

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complete the quota of 06 Berths. Therefore, the existing Berthing Policy may be amended / revised to this extent, under the aforesaid sub-heading.

1. Under (I) General Policy - Dry Cargo :

The order of allotment of Berths requires certain revisions to achieve fine tuning towards an all-encompassing accommodation of various cargo groups within the Berthing Policy framework. In order to achieve this, we suggest that the order of allotment be partially amended as also the foot note pertaining to General category Vessels be partially amended as below :

(i) Finished Fertilizers or any other priority accorded by Government

2 Berths

(ii) Coastal Cargo Vessel

1 Berth

(iii) Priority Group :

5 Berths

Two Berths higher productivity, One Berth 24 Hrs.,
 One berth 13500 MT and One Berth 7000/5500 MT.

In absence of 24 Hrs. group, any Dry cargo Vessel completing within 48 Hrs., whichever is senior, will be accommodated as the 5th Vessel or the allotment sequence shall be repeated to fulfil the criterion of 5 Priority Group Berths

(iv) General Import / Export Vessels

6 Berths

Three Import Vessels and Three Export Vessels will be allotted / accommodated respectively as per their order of seniority in each Import and Export queue. In absence of either Import or Export Vessel,

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the senior most Vessel in the General category group shall be accommodated to complete the quota of 06 Berths.

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| (v) Vessel carrying Steel | 1 Berth |
| (vi) Steel or Project Cargo Vessel
whichever is senior | 1 Berth |
| (vii) General Import/ Export Vessel | 1 Berth |
| (viii) Higher Productivity Vessel/s awaiting Berth | |
| (ix) General Import / Export Vessel/s awaiting Berth | |

2. Under Dry Cargo - (II) PRIORITIES (a) :

Currently the 5500 MT group which is for Break - Bulk cargo, excludes Vessels carrying Timber Logs from within this Group.

In light of the advancements made in deployment of modern equipments, change in handling pattern of Timber Logs at Kandla Port, the daily output evidenced on most Hardwood and many Softwood (Pine) Log Vessels, has been consistently exceeding this threshold output of 5500 MT / day. Under these changed circumstances, denial of this option for Timber Log Vessels to opt for Priority berthing under this category of 5500 MT group, would not only be illogical but unjustified at the same time. Besides, with Timber consistently forming a major portion of the overall Break - Bulk cargo segment at Kandla Port, it is imperative that Timber Vessels be included in this 5500 MT Priority group with immediate effect, adding to increased efficiency and output of the Port.

In addition, in the absence of 24 Hrs. group, any Dry cargo Vessel completing within 48 Hrs., whichever is senior, needs to be accommodated, instead of the existing, as the existing clause limits this option being available to any / all Dry cargo Vessels.

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In view of the above, we suggest that the following words “excluding vessels carrying Timber Logs” be deleted from Para 2, sentence 5 of (II) PRIORITIES (a) of the existing Berthing Policy, as also the necessary partial deletion at sentence 6&7 of (II) PRIORITIES (a). Post this deletion, the said Para 2 of (II) PRIORITIES (a) would read as under :

‘The berth under 24 hours priority will be allotted to vessels handling project cargo and other cargoes on First come-First serve basis. Further, these groups are irrespective of import or export cargo, bulk or break bulk cargo except 5500 MT group that is only for break bulk cargo ships. In absence of 24 hrs. group, any Dry cargo vessel completing within 48 hrs., whichever is senior will be accommodated as 5th vessel.’

2A. Under Dry Cargo - (II) PRIORITIES (f) :

As a corollary to the above revision, consequentially, clause (f) of (II) PRIORITIES would stand deleted.

3. Under (IV) - SENIORITY OF A VESSEL (f) :

To usher in greater transparency and prevent any misuse of the existing stipulation, we suggest certain alteration and addition to this clause as under :

‘If a Shipper is already having one Vessel at Berth in any of the groups with the same cargo, such senior most Vessel can opt not to take Berth and wait under option till their occupied Vessel is sailing without losing seniority of the Vessel. However, sufficient proof evidencing that 100% cargo of the incoming Vessel is of the same Shipper would need to be provided in the form of Shipping Bill/s and duly paid Wharfage + Royalty charges’.

4. Under (V) - REQUISITES FOR THE ALLOTMENT OF BERTH :

Once again, to usher in greater clarity, we would suggest addition of one more clause numbered (e) under the said sub-heading as below :

(e) The readiness of a Vessel can only be declared during the course of Berthing Meeting at 1100 Hrs daily. This time of 1100 Hrs. for declaration of readiness shall be applicable for Holidays as well i.e. irrespective of the Berthing Meeting being held or not. A Vessel shall be considered ready on arrival only if the Vessel readiness has been submitted in time prior to arrival of the Vessel. In case of Vessels that declare readiness after arrival of the Vessel, such Vessels shall be considered as ready from 1100 Hrs. on the day the Vessel is declared ready at the time of Berthing Meeting or in absence of Berthing Meeting, from 1100 Hrs. on the day the Vessel is declared ready.

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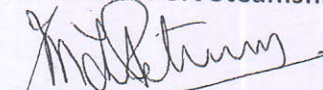
It would be prudent to highlight here that the provision/s containing imposition of penalty to the extent of 3 (Three) times Berth Hire charges for non-achievement of norms, needs to be reviewed. As you would agree that this penal provision has been inserted solely to act as a deterrent to ensure achievement of norms and not as a revenue generating exercise. In view of this intent, we firmly believe that the said penalty needs to be revised downwards to 2 (Two) times the Berth Hire charges. In addition, there needs to be a corresponding inclusion of Incentives for achieving productivity over and above the prescribed norms, in order to encourage further hike in output of various cargoes being handled at the Port.

It is requested that the above revision / amendments in the existing Berthing Policy be carried out and an updated comprehensive revised Berthing Policy Circular duly incorporating the aforesaid suggestions be issued at the earliest.

Thanking you,

Yours faithfully,

For Kandla Port Steamship Agents Association


 President

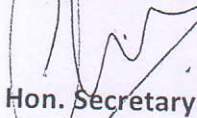


For Kandla Stevedores Association Ltd.


 Secretary



For Kandla Custom Brokers Association


 Hon. Secretary



Cc : The Chairman, Deendayal Port Authority.

Cc : The Deputy Chairman, Deendayal Port Authority.

cc: Sr. AYM DPA



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