

Gd.Day,

Attended the TPNA Tariff Increase Application in Durban and on behalf of my Principals hereby object to the following:

A)Marine Tariff

Feel that the increase requested for 2012/2013 and beyond is not justified, as the requested increase also includes catering for the planned dig out port. We currently incur huge delays in awaiting port services and also due to limited chemical berths, our tankers experience 3 to 6 days delay in awaiting berths. Tankers do not receive any seniority over container or passenger vessel`s, also noting it costs owners usd2500.00 per hour in waiting time. The reason given is that the marine division either busy other movements or there is a backlog. This would not be case if sufficient tugs/pilots are available, especially when the port is fully aware of all ships movements 24hrs in advance.

B)Bunker Levy:

Said subject was a total surprise and a little history here--

All bunkering/ supply to vessel`s were carried out by shore pipelines, until suspended a few years ago as this was deemed unsafe due to failing pipeline in fracture by Sapref(Safref:suplies Bunkers for Engen/Caltex/Bp/Shell)and then came the Barges owned by Unical and Smit Amandla having the monopoly, cost of supplying here is 10.95usd per metric ton, this excludes the price of bunkers that owners have to pay the oil companies.

Questions:

- A) Currently TPNA has no dedicated bunker berths as such, with a levy of R15.00pmt,are they going to build berths to accommodate bunker only vessel`s ?
- B)Is the TNPA going to install pipelines to supply bunkers?
- C)Durban port enjoyed minimum 30 vessel's per month only to take bunkers, currently with concession of 10% taken away(if bunker vsl.docks/sails with 12hrs)noted only about 5/8 vessel calling solely to replenish bunkers--how is the TPNA levy going to help.
- D)Why should the ship owner pay add.levy when they are already be squeezed by Bunker prices/barging cost ?.

Best Regards

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