



Australian  
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Commission

Australian Competition and Consumer  
Commission (ACCC) submission  
to the  
Productivity Commission Inquiry  
into Tasmanian Shipping and Freight

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# Summary

The Australian Competition and Consumer Commission (ACCC) welcomes the opportunity to provide a submission to the Productivity Commission (PC) on the Inquiry into Tasmania's shipping costs and the competitiveness of Tasmania's freight industry (the Inquiry).

The ACCC recognises there is significant public concern from Tasmanian businesses and consumers about perceived high costs of transporting goods across Bass Strait and the resulting cost differentials that are likely to arise for Tasmanian businesses compared to mainland businesses.

The key points in this submission that the ACCC would like to emphasise are:

- The relatively small size of Tasmania's economy and limited trade volumes is likely to explain some of the freight cost differential between it and mainland markets.
- However, there are other impediments to lower shipping costs and a more competitive freight industry in Tasmania which may require regulatory reform. These include:
  - *existing domestic coastal shipping (cabotage) restrictions*—these could be impeding international shipping lines from competing with domestic shippers for local trade, thereby resulting in a lack of downward pressure on shipping costs for Tasmanian (and other Australian) businesses.
  - *port pricing*—levies on shipping lines by port authorities influence the cost of shipping to Tasmania. Such charges could be important given Tasmania's reliance on shipping and the 'double handling' required for international freight to/from Tasmania which currently passes through the Port of Melbourne and other mainland ports.
  - *road freight provision and charging*—the current disconnect between road freight funding and the cost of and demand for road use does not support efficient investment in road infrastructure. The ACCC supports the work underway by COAG to develop a better approach to ensure the right investments in roads are made.
- Where government intervention is used to address equity concerns (such as through subsidies), existing arrangements should be reviewed as there is a risk they may not be delivering efficient outcomes or achieving the stated objectives.
- Part X of the *Competition and Consumer Act 2010* which provides cartel immunity to registered international shipping lines to enable them to cooperate with each other to service Australian trade routes has not resulted in promoting new entry or more favourable freight rates to Tasmanian ports. Revocation of Part X is long overdue.

The ACCC is available to discuss this submission in more detail. The ACCC contact is:

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# The ACCC's role in the PC Inquiry

The ACCC is pleased to provide a submission to the PC on the Inquiry into Tasmanian shipping and freight.

The scope of the inquiry covers several aspects of transport infrastructure pricing, competition and efficiency that impact on overall shipping and freight costs affecting Tasmanian importers, exporters and the broader community. Of these, the ACCC has a number of roles that are relevant and provides comments in this submission based on its experience. In particular, the ACCC monitors container stevedoring services, assesses mergers and acquisitions that may be likely to substantially lessen competition, regulates access to certain ports and rail infrastructure and enforces the competition law in the *Competition and Consumer Act 2010* ('the Act').

The ACCC's objective as set out in the Act is to enhance the welfare of Australians through the promotion of competition and fair trading and provision for consumer protection.

For the purposes of this inquiry, the ACCC considers that the following principles are particularly relevant:

- Competitive markets where possible are the best means of achieving efficient outcomes for consumers.
- Cost reflective pricing and efficient investment in infrastructure will send the appropriate signals to influence supply and demand for infrastructure.
- Where regulation is required to address problems of market failure, a principle of National Competition Policy is that legislation should not restrict competition unless the benefits outweigh the costs to the community; and the objectives of the legislation can only be achieved by restricting competition.

## Concerns with the costs of Tasmanian shipping and freight

Freight and logistics are particular challenges for an island state like Tasmania, which relies on shipping for much of its trade.

Interstate and international export industries are of key importance to Tasmania's prosperity, accounting for around 40 per cent of economic activity in the State. Interstate exports account for two-thirds of Tasmania's total exports. Demand for interstate exports tends to be driven by economic conditions and household spending patterns in mainland Australia.<sup>1</sup>

The ACCC is aware of strong public concern from Tasmanian businesses and consumers about perceived high costs of transporting their products to and from markets. It is argued that Tasmanian businesses suffer a cost disadvantage compared to mainland businesses.

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<sup>1</sup> State Government of Tasmania, Budget Paper No 1 2013-14, page 2.13.

## There is a role for competition and efficiency goals to drive lower business costs

Promoting competition through low industry barriers and encouraging businesses to operate at lowest sustainable cost is important for keeping freight costs down in small markets such as Tasmania.

First, competition pushes businesses to improve their performance by innovating and investing in new services and technologies. Second, competition benefits consumers with greater choice and better products. Competition helps to ensure that prices will be lower and quality higher than would be the case if there were no or little competition. Third, through driving firms towards greater efficiency, competition provides for higher levels of economic growth, increased employment and higher living standards. As such, competition is not a goal of itself, but a means of achieving higher living standards for the community.

## Identifying the factors affecting costs in Tasmanian shipping and freight

To the extent that Bass Strait shipping and freight costs are relatively high, these are likely to be influenced by market characteristics, the most obvious being Tasmania's relatively small market size, compared to mainland markets. However, there could be other factors that are influencing the cost differentials between Tasmanian and mainland businesses, including potential regulatory failure in a number of areas.

### Tasmania's small economy and limited trade volumes could explain freight cost differentials between it and mainland markets

Tasmania is a relatively small economy compared to most other Australian states and territories. Lower levels of state demand most likely contribute to limited freight volumes being exchanged at Tasmanian ports compared to mainland ports where exchanges are higher.

Because economies of scale generally prevail in shipping, lower volumes are likely to affect the cost of supplying freight and shipping services to Tasmanian businesses. Existing capacity in Bass Strait shipping services is supplied by three operators (TT Line, ANL/Toll and SeaRoad). Globally, the structure of the international container shipping industry is based on large volumes being exchanged whereby multiple shipping lines participate in consortia arrangements to maximise their port coverage, regularity of services and benefits of economies of scale. The smaller scale in the Tasmanian trade means the provision of additional shipping capacity is unlikely to be as commercially attractive for a new entrant as it might be in larger markets.

### **ACCC monitoring of container stevedoring services involving Tasmanian ports identifies that international shipping services have been marginal businesses**

Through its prices oversight responsibilities, the ACCC is aware that international shipping services at the Port of Burnie have been marginal.

The ACCC has a prices oversight role in relation to the supply of container stevedoring services at several Australian container ports. Container stevedoring involves lifting containers on and off ships. Pursuant to Part VIIA of the Act, the ACCC monitors prices, cost and profits of container stevedores at six Australian container ports. Patrick and DP World Australia operate at the four largest ports—Brisbane, Fremantle, Melbourne and Sydney. The ACCC

also monitors Flinders Adelaide Container Terminal Pty Ltd, as the sole operator at the Port of Adelaide.

At the remaining monitored Port of Burnie, no dedicated stevedoring service of international containers is currently provided since Patrick exited its operations in May 2011. The exit of Patrick was due to the exit of the only international container shipping service (the AAA consortium which operated a scheduled weekly service) in 2011. While the ACCC is unable to make observations about the minimum level of container volumes necessary to make an international shipping service viable, the relatively small market is expected to be a strong contributing factor to the absence of a direct international shipping service to and from Tasmania.

More information on the ACCC's monitoring program and access to the report series is available at [www.accc.gov.au/regulated-infrastructure/waterfront-shipping/monitoring-reporting-for-container-stevedoring](http://www.accc.gov.au/regulated-infrastructure/waterfront-shipping/monitoring-reporting-for-container-stevedoring).

### **ACCC merger assessments involving Bass Strait shipping and freight forwarding services**

One of the ACCC's responsibilities is to scrutinise mergers and acquisitions that may adversely affect competition. Mergers between corporations which increase horizontal aggregation or vertical integration will fall for consideration under Section 50 (s.50) of the Act. S.50 prohibits acquisitions that result in, or are likely to result in a substantial lessening of competition in any market.

Merger analysis requires comparing likely future states - the future with the merger and the future without the merger. This comparison isolates the merger's impact on competition and is not an analysis of the competitiveness of a market per se.

Through its s.50 role, the ACCC has previously assessed the effect of a number of mergers on competition in Bass Strait shipping services and freight forwarding services between the mainland and Tasmania. In some instances, the ACCC has required the merged firm to divest shipping assets to preserve competition in a small market. A brief summary of relevant ACCC assessments is presented below.

#### *Toll Holdings Ltd's (Toll) proposed acquisition of Patrick Corporation Ltd (Patrick) (2006)*

The ACCC reviewed Toll Holdings Ltd's (Toll) proposed acquisition of Patrick Corporation Ltd (Patrick) in 2006 and concluded that it would have the effect or likely effect of substantially lessening competition in a market in contravention of s.50 of the Act.

The ACCC found that Toll and Patrick were each other's closest competitors. Toll and Patrick were the two largest operators providing Bass Strait shipping services at the time and the only two operators offering daily or six day a week containerised freight shipping services. The merged firm would have also had a very high market share in the market for freight forwarding services between mainland Australia and Tasmania. The ACCC considered that the proposed acquisition would be likely to substantially lessen competition in these markets.

The ACCC instituted proceedings against Toll in the Federal Court over its proposed acquisition but subsequently accepted revised court-enforceable undertakings from Toll in relation to the proposed acquisition. The terms of the undertaking included divestment by Toll of Patrick's Bass Strait shipping and freight forwarding operations. The ACCC considered that this divestiture would address its competition concerns by ensuring that a vigorous and effective competitor to Toll would remain post-merger. Pursuant to the divestiture, Patrick's Bass Strait shipping and freight forwarding operations were purchased by SeaRoad Holdings Pty Ltd (SeaRoad).



A copy of the ACCC's Public Competition Assessment is available at <http://transition.accc.gov.au/content/index.phtml/itemId/724185>

#### *Toll and ANL Container Line joint venture (2009)*

In 2009, the ACCC concluded that a proposed joint venture between Toll and ANL Container Line Pty Ltd (ANL) would not substantially lessen competition for Bass Strait shipping services. The ACCC considered that the joint venture parties were likely to be competitively constrained by the two existing competitors – SeaRoad and TT-Line – and that ANL was not likely to continue to be a vigorous and effective competitor in the absence of the joint venture.

#### *Toll's proposed acquisition of Linfox's freight forwarding businesses (2013)*

In 2013, the ACCC concluded that a proposed acquisition of Linfox Australia's Trans-Bass Freight Forwarding business by Toll would not substantially lessen competition. In the market for freight forwarding services between Tasmania and mainland Australia, the ACCC considered that remaining competitors would provide an ongoing competitive constraint. In the market for Bass Strait shipping services, the ACCC considered that the proposed acquisition would not materially impact competition between Toll ANL, SeaRoad and TT-Line or the extent to which SeaRoad and TT-Line would provide an ongoing competitive constraint on Toll ANL.

#### *ACCC authorisation of Australian Amalgamated Terminals Pty Ltd (AAT) joint venture arrangement to operate automotive stevedoring terminals including at Bell Bay (2009)*

In 2009, the ACCC granted conditional authorisation to enable the operation of the AAT joint venture. AAT provides access to its terminals to stevedores and other terminal users for the loading and unloading of automobiles, general cargo and containers. Authorisation is a process set out under Part VII of the Act, whereby the ACCC can grant protection from legal action for potential breaches of the Act if it is satisfied that the conduct delivers a net benefit to society. That is, where the likely public benefits from the arrangement outweigh likely detriments, particularly from reduced competition.

AAT operates at five ports in Australia, including at the Port of Bell Bay in Tasmania. In its assessment, the ACCC considered whether AAT had the ability and/or incentive to deny access to its terminals to stevedores in competition with its shareholders or to discourage new entry through price and non-price conditions of access. At the Port of Bell Bay, the ACCC noted the lease between Tasports and AAT required AAT to provide open access to the Bell Bay terminal on a non-discriminatory basis and provide Tasports with details of its charges and variations of its charges from time to time. The ACCC was not provided with further information about the oversight by Tasports; however, concerns about AAT's tariffs were not raised in respect of Bell Bay as part of its assessment of the authorisation application.

To ensure AAT's joint venture arrangements deliver a net public benefit, the ACCC imposed the following conditions of authorisation, requiring AAT to:

- provide a mechanism for stevedores to seek access to AAT's terminals
- subject any proposed price increases to terminal end-users to review by an independent party and
- provide end-users with a dispute resolution process for non-price disputes.

The ACCC's authorisation expires on 31 December 2019.

A copy of the ACCC's authorisation determination is available at: <http://transition.accc.gov.au/content/index.phtml/itemId/876346/fromItemId/401858>

## Other potential impediments to lower shipping costs and a more competitive freight industry may require regulatory reform

Apart from the size of markets, the ACCC has identified three possible impediments to establishing more competitive freight and shipping services affecting Tasmanian businesses. Some of these may require regulatory reform.

### **Existing domestic coastal shipping and cabotage restrictions could be adding to shipping costs and limiting competition in shipping services**

The 2009 ministerial guidelines on coastal shipping state that the policy objective is to foster a viable coastal shipping industry in a competitive domestic transport sector.<sup>2</sup> Cabotage restrictions form part of these current arrangements.

Cabotage is the transport of goods (or passengers) between two locations in the same country by a vessel (or aircraft) registered in another country. Australian shipping is subject to a number of regulations whereby vessels are required to register and obtain licenses to operate along Australia's coastline. For vessels registered in overseas countries to carry domestic (Australian) cargo when operating along Australia's coastline, they must adhere to additional regulations prescribed under the *Fair Work Act 2009* whereby international shipping lines are required to pay their foreign crews Australian minimum wages and conditions for the duration of their Australian voyage.

These requirements on international shipping lines could add to the cost of coastal shipping.

Additional costs imposed on international lines may affect whether such lines compete in the market for Australian coastal shipping. Where domestic trade represents an international shipping line's marginal business, any additional costs or regulatory requirements to carry domestic cargo could act as a general disincentive to entering the domestic shipping market.

While no foreign shipping line currently provides a direct international service to Tasmania, the Port of Melbourne is Australia's largest container port and is served by numerous lines and consortia. However, none of these lines offer a shipping service between Melbourne and Tasmania or compete with existing domestic Bass Strait shipping services.

It may be that freight travelling between Tasmania and mainland Australian cities generally could see more frequent and lower cost services if foreign lines could more easily transport domestic cargo and not have to face higher costs imposed on them as a result of complying with existing coastal shipping arrangements. This might, in turn, create a more favourable business case for an international service to Tasmania to be re-established.

In accordance with National Competition Policy, the coastal shipping arrangements including cabotage, as a restriction on competition, should be reviewed to see whether the objective of preserving domestic shipping can only be achieved by restricting competition and if so, whether the costs outweigh the benefits.

### **Port pricing arrangements could be adding to Tasmanian shipping costs**

Given Tasmania's dependence on shipping, the level of charges levied on shipping lines by port authorities might be an important consideration in the overall costs faced by Tasmanian shippers.

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<sup>2</sup> Ministerial Guidelines for Granting Licenses and Permits to Engage in Australia's Domestic Shipping, [www.infrastructure.gov.au/maritime/freight/licences/ministerial\\_guidelines.aspx#preamble](http://www.infrastructure.gov.au/maritime/freight/licences/ministerial_guidelines.aspx#preamble)

Port operators impose a range of levies on vessels to cover the cost of moving vessels in and out of local ports. In some cases, port levies are also introduced to fund port infrastructure developments.

Ports in Australia are generally not price regulated and have discretion to set and introduce port charges according to commercial and other objectives. In 2011, the Victorian Government introduced legislation requiring the Port of Melbourne Corporation (PoMC) to pay an annual Port License Fee (around \$75 million) which was first recovered from shipping lines in July 2012. The PoMC levied a fee of around \$25 per TEU<sup>3</sup> on all full import and export containers moving through the Port of Melbourne. Shipping lines in turn are likely to pass this cost through to their customers.

Prior to the exit of regular international shipping services to and from certain Tasmanian ports in 2011, the ACCC understands that there were some scheduled services involving other Australian ports (such as the Port of Fremantle). It is therefore possible that port pricing arrangements at other Australian ports (not just Melbourne) could have also impacted on overall shipping costs to and from Tasmania.

### **Road freight pricing structures do not support efficient provision of transport infrastructure**

The ACCC understands that most trade in Tasmania is moved by truck rather than train. It is also aware of public comments by Infrastructure Australia which regards the state of road and rail infrastructure in Tasmania as generally inadequate and inefficient.<sup>4</sup>

Existing national road pricing structures do not encourage efficient investment in essential freight infrastructure. The ACCC, in its *Container Stevedoring Monitoring Report No. 15* (released in November 2013), argued that an anticipated doubling in the nation's freight task over the next twenty years requires fundamental landside reform to ensure roads and rail tracks are able to cope with future demand. In particular, the ACCC considers that reform of heavy vehicle road provision and charging is necessary to better reflect the cost of road use and ensure the right investments in roads are undertaken.

Currently, the revenue governments receive from heavy vehicle charges are not linked with heavy vehicle road use. Roads are funded through taxation revenue at a local, state and national level through the annual government budgetary process. This results in a fundamental disconnect between heavy vehicle road charges and future road funding and, as a consequence, the right investments in key roads for freight transport may not be undertaken.

The ACCC argues that a better approach is needed—vehicle road charges should reflect the cost of road use and the revenue should flow back to improving road services. Fundamental structural reform is required to ensure the right roads are provided and charged for. Road user charges need to be separated from taxation revenue and distributed to road providers to spend on the road network.

Economic regulation can ensure that this is done efficiently. For example, in industries such as rail and energy, user charges are set on the basis of future build and spend programs. These issues are being examined by the Heavy Vehicle Charging and Investment (HVCI) Reform group, an initiative of the Council of Australian Governments (COAG). The ACCC supports the work underway by this group to deliver much needed reform.

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<sup>3</sup> TEUs (twenty foot equivalent units) are the standard unit of measurement for shipping containers. One TEU is equivalent to one 20-foot shipping container.

<sup>4</sup> Infrastructure Australia, Letter from National Infrastructure Coordinator Michael Deegan to the Hon. Anthony Albanese MP, then Minister for Infrastructure and Transport, 24 May 2012.

## There is a risk that existing subsidy arrangements are not delivering efficient outcomes or achieving their objectives and should be reviewed

Freight equalisation schemes that attempt to reduce the disparity between costs faced by Tasmanian businesses and their mainland counterparts may form part of a government's broader social policy objectives by encouraging industries to operate at lowest possible cost and improving community living standards.

The ACCC has no administrative or oversight responsibilities of the existing subsidy arrangements applying to the Tasmanian Freight Equalisation Scheme (TFES), the Bass Strait Passenger Vehicle Equalisation Scheme (BSPVES) or the Tasmanian Wheat Freight Scheme (TWFS). It can therefore offer no policy insights into their operation. The ACCC notes however that the PC examined the TFES in 2006.

Given the potential for negative externalities to exist with the operation of some industry subsidies, for example through distorted pricing and investment incentives, it is appropriate that existing subsidy arrangements be reviewed to ensure that they are delivering efficient outcomes and achieving their stated objectives.

## Part X of the Act has not promoted entry of foreign shipping line services to and from Tasmanian ports and should be revoked

Most international shipping lines servicing Australian ports operate as part of broader consortia agreements. The rationale is that consortium services enable individual shipping lines to achieve lower operating costs through the vessel sharing arrangements and their ability to maximise the coverage of ports and regularity of scheduled services. In theory, a single smaller shipping line operating its own service may not service a smaller port as it would be unable to secure sufficient cargo volumes to match the cost and service efficiencies available to large consortia.

Part X of the Act provides cartel immunity for shipping lines and is designed to enable foreign shipping lines to enter smaller markets than they otherwise might. This part of the Act describes the conditions under which international liner shipping services are permitted to cooperate as 'conferences' to provide shipping services to Australian exporters and importers. Part X allows individual shipping firms to enter into cooperative arrangements that otherwise would contravene certain anti-competitive conduct provisions (s.45 and s.47) of the Act. These exemptions allow conferences to set joint freight rates, pool costs and share capacity of vessels operating scheduled services to and from Australia.

By definition, conferences constrain competition between member lines. While they are intended to provide Australian shippers with access to regular international shipping services and potential cost savings by bolstering the negotiating power of shippers, there is no evidence to suggest Part X has resulted in any significant benefits for Tasmania. Even though there is an apparent over-supply of shipping services globally, the Part X arrangements have not been effective in incentivising the entry of international shipping services in the case of Tasmania.

The regulation of international liner cargo shipping services was last reviewed in 2004. While the Government agreed to undertake some pro-competitive reforms to modify the regulation of international shipping services, those reforms were not implemented. The ACCC notes similar cartel immunity provisions for international shipping lines have since been repealed in several overseas jurisdictions—most recently in New Zealand—whereby the competition provisions that apply to all businesses seeking to enter into cooperative agreements with potential competitors also now apply to international shipping services. The revocation of Part X is long overdue.

The ACCC's views regarding the operation of Part X are available in its public submission to the PC 2004 Review of International Liner Cargo Shipping and can be accessed at [www.pc.gov.au/\\_data/assets/pdf\\_file/0020/43715/sub021.pdf](http://www.pc.gov.au/_data/assets/pdf_file/0020/43715/sub021.pdf)

## Further consultation on the PC Inquiry

The ACCC is available for further consultation with the PC and to discuss this submission in more detail.

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