



9 October 2021

Ports Regulator of South Africa
Private Bag X54322,
Durban, 4000

Attention: **The Chairperson, Ports Regulator of South Africa**

Dear Sir

PORT TARIFF 2021 – DISPENSATION FOR LOCALLY FLAGGED SHIPS

Thank you for offering VUKA Marine the opportunity to contribute to your review of national port tariffs. We are grateful to the Ports Regulator of South Africa (PRSA) for the support that has been offered to South African registered vessels that are engaged in international movement of goods.

You will know that since 2015 VUKA Marine has registered four vessels under the South African flag – the first vessels to be so registered since the 1980s – and is planning to bring further ships in future. We note that it remains a central tenet of Government maritime policy to grow the National Shipping Register. We support this, since a nationally owned merchant navy is the only reliable way to support job creation and skills development priorities that both industry and Government consider key to sustainable industry growth.

We urge PRSA to maintain, or even increase, and make permanent the port cost reduction for South African-registered ships that are engaged in international shipping. Admittedly, the number of locally flagged ships that are trading internationally is still small, and they seldom call at South African ports. But the cost of the tariff to the ports is thus not excessive, and this remains the only tangible incentive that has been created for the South African registry. It is a powerful signal of Government support for the flag.

In addition, we urge PRSA and TNPA to implement a dispensation that South-African registered ships arriving from foreign ports (*i.e. involved in “international shipping”*) should be offered prioritized berthing. This would enhance the port cost reduction by limiting demurrage costs for South African ships. It would not be unacceptable if this was tied to job creation priorities by requiring that South Africans comprising more than 50% of the onboard crew complement.

Please let me know if I can provide further information to inform your decision.

Yours sincerely,

AH Millard (Director)
Director

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