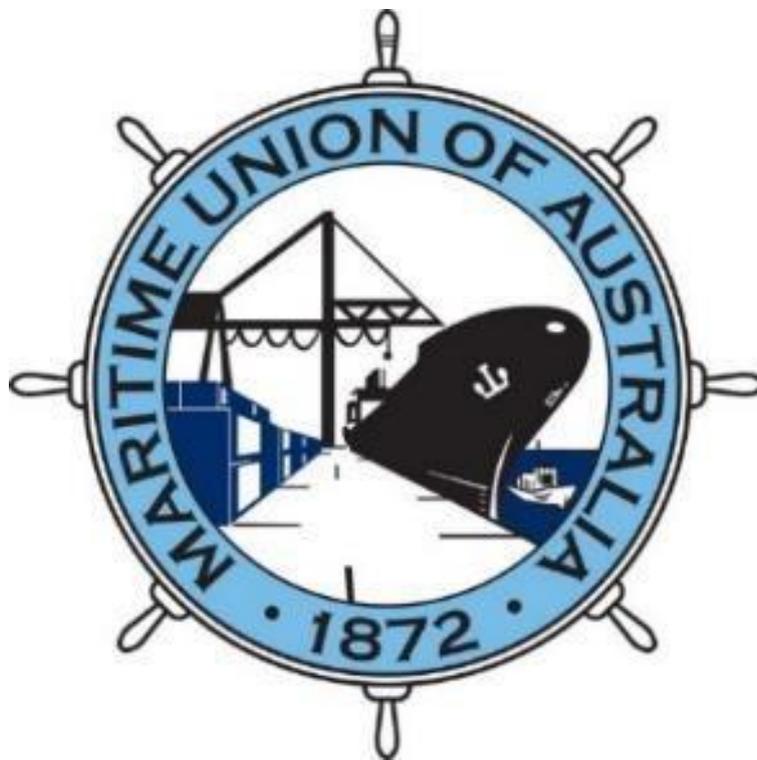


Hydrogen Production Tax Incentive

Submission from the Maritime Union of Australia



July 2024

The Treasury

Submitted via email to: HydrogenProductionTaxIncentive@treasury.gov.au

Paddy Crumlin, National Secretary,

Maritime Union of Australia

A Division of the Construction, Forestry, Maritime, Mining and Energy Union

365 Sussex St, Level 2,

Sydney NSW 2000

Paddy.Crumlin@mua.org.au

For inquiries contact: penny.howard@mua.org.au

Background

This submission has been prepared by the Maritime Union of Australia Division (MUA) Division of the Construction, Forestry, Maritime Employees Union (CFMEU).

The MUA represents approximately 14,000 workers in the shipping, offshore oil and gas, stevedoring, port services and commercial diving sectors of the Australian maritime industry. This includes coal export terminals. The MUA is also part of the Offshore Alliance (with the AWU) which represents workers on offshore oil and gas facilities.

MUA members will work in hydrogen and ammonia port terminals, bunkering facilities and vessels, and on vessels using hydrogen, ammonia and other renewable energy fuels.

The MUA supports the government taking action to address climate change. We are working hard to prepare our membership and industries for the necessary transition to a zero-net emissions economy and society. We recognise the need to urgently reduce emissions globally and in Australia to prevent global heating from exceeding 1.5°C, but this will have a very significant impact on the jobs held by many of our members. Our ability to provide climate leadership in these industries depends on the ability of governments and of our union to deliver a just transition to our members working in fossil fuel industries, and their communities. If we cannot provide such a transition, we risk significant reductions to workers' living standards, deepening inequality, and a very significant political backlash which could stall the transition we need.

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Summary

The MUA welcomes the opportunity to make a submission to Hydrogen Production Tax Incentive (HPTI) Consultation Paper. The MUA supports the Future Made in Australia (FMiA) package and the Government’s efforts to encourage the production of renewable hydrogen in Australia.

We support the concept of a production tax incentive but the HPTI requires further work. It must be tied to clearer community benefits and quality jobs. Proper industrial policy must be developed to ensure this new industry is safe, properly planned, and delivers good quality jobs. The HPTI is one mechanism that can support this.

The MUA recognise the production of hydrogen will be taking place on First Nations land. First Nations must also be thoroughly consulted and provide Free Prior and Informed Consent for funded projects, and be included in the benefits from these projects.

As domestic petroleum refineries closed there was national neglect of Australia’s shipping capabilities over the past decade, Australian crew were removed from tankers operating around the coast and replaced with exploitable foreign crews. The current government has an ambition to grow Australian shipping. Hydrogen offers an opportunity to revitalise Australian shipping and aligns with the Government’s vision.¹

The MUA makes several recommendations with the aim of ensuring safe and secure Australian jobs to increase our supply chain resilience in this sovereign industry and maximise the contribution to the Australian economy and communities.

¹ DITRDCA, [Maritime Strategic Fleet](#), accessed July 2024. Minister Catherine King, [Report shows Strategic Fleet can bolster Australia's maritime and freight sectors](#), November 2023. Prime Minister Anthony Albanese, [Labor Will Create a Strategic Fleet to Protect Our National Security and Economic Sovereignty](#), January 2022.

Who is eligible

MUA members will work in hydrogen and ammonia port terminals, bunkering facilities and vessels, and on vessels using hydrogen, ammonia and other renewable energy fuels. For liquid fuels industry, MUA members have historically worked in ports loading and discharging ships, in port services such as tugs and lines, and as seafarers on ships.

The maritime role in fuel production includes:

- Port services in fuel production and receiving ports (eg. tugs, lines, pilots)
- Loading and discharge of fuel to/from ships at specialised port fuel terminals (jointly with the United Workers Union as part of the Bulk Liquids Alliance).
- Ships carrying fuel products domestically and overseas.

Hydrogen developers the MUA are in contact with anticipate substantial use of shipping both domestically and internationally, and are keen to develop Australian capability and shipping fleets. There is a significant opportunity to align with the current government's ambitions to grow Australian shipping.

Domestically, airports are anticipated to be substantial users of hydrogen and derivative fuels, and are located in densely populated urban areas. It will not be feasible to make hydrogen at Sydney airport, but airport fuels are currently supplied through a pipeline to the port. Ships will need to bring new air fuels to the port terminal for use at the airport.

It is expected that a substantial volume of renewable hydrogen (or its derivatives such as renewable ammonia) will be produced for export. This can only be transported by ship, expected to be ammonia-fuelled ammonia carriers, or hydrogen-fuelled hydrogen carriers. Developing Australian expertise in operating these next-generation ships carrying export cargos is a substantial opportunity.

With hydrogen's reliance on shipping, the MUA calls for all FMiA programs and funding arrangements, including the HPTI to recognise the role of Australian flagged and crewed ships as part of its eligibility criteria and as a factor in any final investment decisions. The entity receiving HPTI must be conditional on:

- Ensuring quality jobs through the implementation of a Secure Jobs Code (this could form part of the Community Benefit Principles)
- Include as a 'community benefit principle' for Future Made in Australia support the strengthening of domestic and international transport resilience and capability, across all modes including Australian shipping.
- Maximising the Australian content for domestic and international hydrogen and ammonia supply chains and exports and requires the use of Australian registered ships; and
- Maximising the employment of suitably qualified local workers, engaged under registered industrial instruments, agreed between relevant unions and employers

- Providing for training and skills development of local workers, minimum requirements for trainees and apprentices, and the employment of workers from groups underrepresented in the workforce. This must include employment and training of Australian seafarers in the hydrogen and ammonia supply chain.

The MUA will be calling for an amendment to the *FMiA Bill* to recognise the role of Australian shipping in transport supply chains in the Community Benefit Principles.

The MUA is concerned that Treasury is not considering the provision of additional incentives for meeting the community benefit criteria and suggest that a good case can be made to provide additional tax credits or incentives for entities that use Australian shipping to develop and support Australia's sovereign capability.

It is critical that ordinary people see positive results from any production tax incentives. This can best be achieved by ensuring that the industry provides quality secure, union jobs in their surrounding community and in its import and export supply chains. While many well-established facilities and ports do currently provide quality jobs and union agreements, it is critical that new facilities not undermine this, or that the introduction of new processes not result in production pressures that undermine established safety processes.

Administrative arrangements

The administrative arrangements under the DCCEEW and ATO places them in a critical position with significant responsibility to set the benchmark for industry standards. While the MUA does not have specific views on which Government Agency(ies) administer the HPTI, we urge the Government to ensure that Agencies are resourced and capable of leading this work in terms of its organisational knowledge, strategic leadership, governance and culture. This is to ensure that the agencies have a full understanding of the many stakeholders and considerations involved to develop a strong social license and a safe and skilled workforce.

The MUA's experience with ARENA has demonstrated the pitfalls when an Agency fails to properly consult or engage with unions about merit criteria. To give one example, ARENA has shortlisted Hydrogen Headstart projects that do not have satisfactory strategies for developing a workforce that will result in community benefit and good social license. Those that proactively worked with unions to develop an MOU to demonstrate the community benefit were not shortlisted.

The MUA's strong position is that companies who do not have detailed commitments to community benefits in line with the Government policies – including Australian jobs with good union conditions of employment and the engagement of Australian flagged and crewed vessels – should not be receiving incentives or subsidies to develop projects.

Community Benefit Principles

The government has a plan to grow Australian shipping, establish an Australian Strategic Fleet, and to review and improve the *Shipping Registration Act 1981* and *Coastal Trading (Revitalising Australian Shipping) Act 2012* (CTA).² Shipping is key service underpinning the net zero transformation, providing critical transport services to many renewable industries, as well as itself requiring decarbonisation. Shipping also underpins Australia's future economic security and resilience, which is why the government has chosen to invest in both domestic shipping capability and the FMiA industries. However, there are opportunities to improve the alignment and coordination between these two important areas of government work, particularly as there is already considerable overlap.

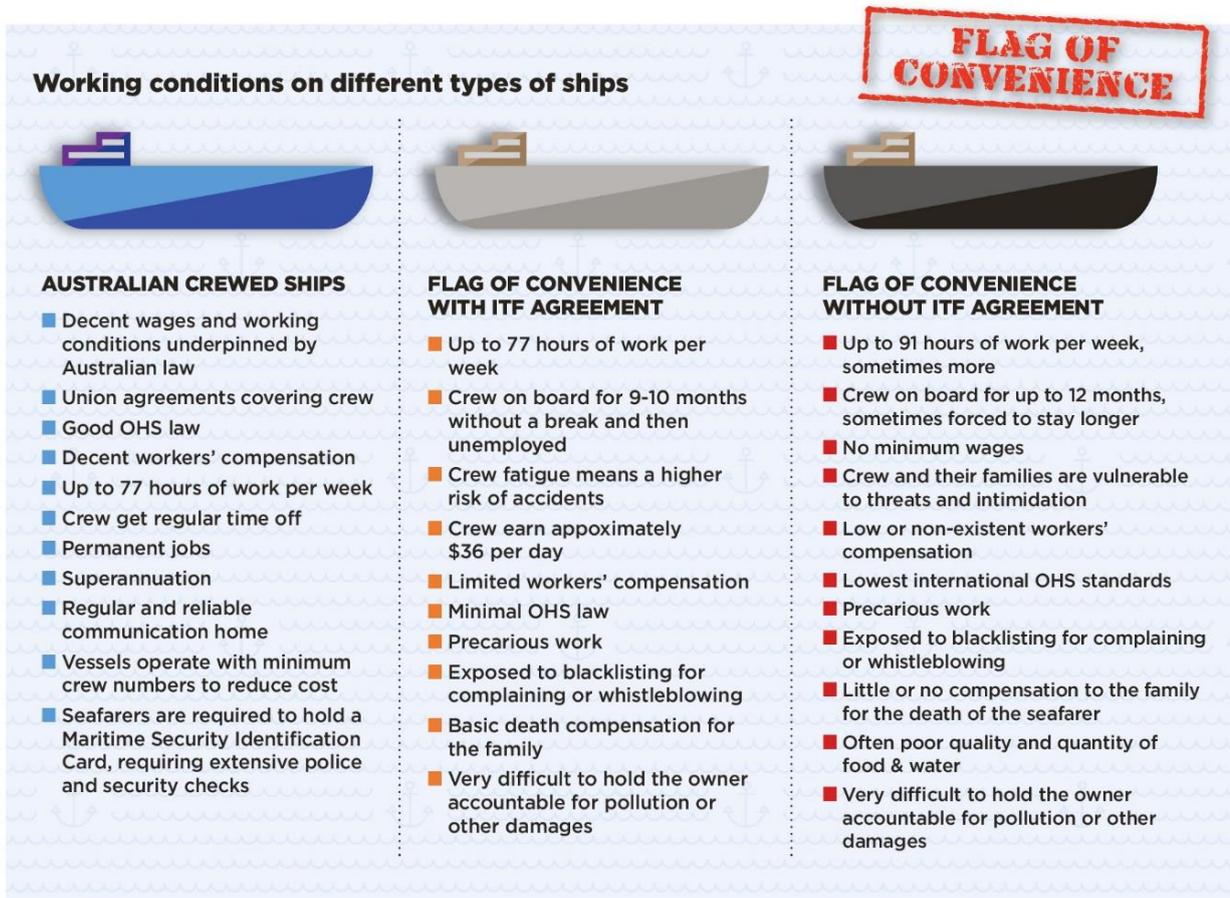
Cabotage arrangements in shipping have been undermined in the past two decades, decimating Australian shipping by creating an unlevel playing field between Australian flagged and crewed vessels and internationally/foreign flagged and crewed vessels. The loopholes in the CTA and exploitative use of Temporary Licenses have meant that 99% of the coastal trade in Australia is now foreign flagged and crewed. There is no other industry where workers while working in Australia are not provided with the same rights and conditions as Australian workers. The MUA notes and welcomes the Government's commitment to review the Act this year.

There is significant safety, environmental and social risks with the use of international ships that do not have to adhere to Australian safety, environmental and labour standards and regulations. A recent report found that between 2011-2021, seafarers on international flag ships in Australian port had \$38 million in stolen wages.³ More recently, between 2022-June 2024 the ITF Inspectorate recovered another \$US35.7 million of stolen wages for foreign seafarers working in Australia. These human rights issues are ongoing and industries and companies relying on public subsidy should not be seen as supporting or relying on these kinds of practices.

² DITRDCA, [Maritime Strategic Fleet](#), accessed July 2024. Minister Catherine King, [Report shows Strategic Fleet can bolster Australia's maritime and freight sectors](#), November 2023. Prime Minister Anthony Albanese, [Labor Will Create a Strategic Fleet to Protect Our National Security and Economic Sovereignty](#), January 2022.

³ Rod Pickette, Lily Raynes and Jim Stanford, [Robbed at Sea: Endemic Wage Theft from Seafarers in Australian Waters](#),

Figure 1: A comparison of working conditions on Australian and international ships. Since the graphic below was made, pay for seafarers on ITF agreements (middle column) has increased to roughly \$50 per day.



Source: Maritime Union of Australia and International Transport Workers Federation

Safety

Hydrogen is a dangerous, experimental and high-value cargo. Transported as ammonia, it is also highly toxic to people and the environment – it is classified as 'Hazardous' by Safe Work Australia, as toxic by inhalation, and causing burns. At high concentrations, it can cause death by inhalation.⁴ A liquid ammonia explosion in April 2013 decimated 4 blocks around a Texas facility, and shook the ground over 100km away.⁵

We urge Treasury and the Government more broadly to require that hydrogen and ammonia shipping within Australia and from Australia take place on Australian flagged and crewed ships, governed by Australian WHS and fatigue standards. Ships must be regulated under the *Navigation Act 2012*, crew must have Navigation Act qualifications and vessels must have clear Minimum Safe Manning documents (MSMD) that reflect the danger and complexity of the cargo and the location of facilities

⁴ IMAP – Accelerated assessment of industrial chemicals in Australia, [Ammonia and Ammonium hydroxide: Human health tier II assessment](#), 04 July 2014.

⁵ Ker Than, [Explosion Highlights Dangers of Anhydrous Ammonia](#), *National Geographic News*, April 21 2013.

near population areas. Tripartite consultations should take place on the MSMD. Dangerous goods training under the National Law is not at all sufficient. The costs of this are minimal in comparison to the value of the cargo, and the importance of safely establishing the industry.

There is too much at stake to leave the safe regulation and rapid development of the industry to other flag state authorities, or to foreign flag of convenience shipping and crews.

The opportunity should also be taken to make better use of the existing domestic ammonia supply chain. Newcastle has a working ammonia port terminal operated by Orica. Since January 2010, Orica has also had an ammonia tanker on long-term charter to carry ammonia from Orica facilities in Newcastle to Orica facilities in Gladstone. The Newcastle ammonia terminal and the tanker *Wincanton* could provide an excellent opportunity for research and development of hydrogen and ammonia ships, bunkering and port facilities, and training of tanker crew.

However, Orica has instead chosen to use a Flag of Convenience ship for these cargos, operating on Temporary Licences held by Orica under the CTA. We are not aware of any Australian ever being employed on this ship, despite it only operating in Australia. The *Wincanton* is currently flagged and registered in Panama, operated by Peruvian company Transgas, and has an all-Peruvian crew. During the time it has operated in Australia, it was previously flagged in the Marshall Islands, and Singapore before that. It has also been operated by the Singaporean office of German company Bernard Schulte, by the Norwegian company Pareto Business Management, and by the American company Petredec through its Bermudan office. At various times the ship has also had crew from the Philippines and from Myanmar.

The outsourced and inconsistent ship management not only prevents the development of a proper program to use the ship and its terminals to assist in the development of the hydrogen and ammonia industry in Australia, it has also lead to multiple safety breaches. The *Wincanton* was detained by Australian authorities in November 2019 and February 2020, with further defects identified in September and December 2020. Fire safety defects were identified in October 2021, and were not rectified until February 2022. Full details of the detentions and defects are available in Appendix A. Reputable ship owners seek to avoid any detention of their ships.

A ship is detained when the Australian Maritime Safety Authority (AMSA) judges that the problem is severe enough to hold the ship in port until it is fixed, despite the considerable cost and inconvenience to the ship owner (a detention). It is only applied to more dangerous problems than a 'deficiency' or 'defect'.

AMSA explains that detentions are made:

To ensure that the ship will not sail until it can proceed to sea without presenting a danger to the ship or persons on board, or without presenting an unreasonable threat of harm to the marine

*environment, whether or not such action will affect the scheduled departure of the ship.*⁶

Governments at all levels should mandate Australian content in domestic shipments of hydrogen and ammonia, particular where the industry is supported by government.

The MUA strongly recommends that all aspects of the FMiA industries must have a maritime component. The FMiA program could complement the Strategic Fleet and revitalisation of the Australian maritime industry by leveraging funding to support the development of Australian maritime industries. FMiA investments, including the HPTI, could support government's shipping ambitions as follows:

- Include as a Community Benefit Principle to support the strengthening of domestic and international transport resilience and capability, across all modes including shipping.
- Eligibility for HPTI must be conditional on the entity receiving support providing ongoing evidence of:
 - Domestic and international supply chains and exports that maximise the use of Australian registered ships, particularly where public funds are supporting export projects
 - A requirement for Australian employment and training of Australian seafarers on those ships
 - A higher-level incentive could be provided to companies that utilise Australian shipping and/or the strategic fleet network. Conversely, funding must not include logistics/transport costs for foreign flagged and crewed vessels.
- The Strategic Fleet could be used to trial and train seafarers and develop capabilities in the use of decarbonised technology, in coordination with the Maritime Emissions Reduction National Action Plan (MERNAP). MERNAP outcomes could also be leveraged through shipping in FMiA-funded projects.

If requirements around shipping such as those outlined above are not made explicit in government policy, use of international/foreign shipping will be the default. An important opportunity to rebuild Australia's maritime industry will be missed and companies will continue to put our environment at risk while exploiting international workers within Australia's borders on domestic trade routes.

Furthermore, the inclusion of shipping would significantly increase the Australian economic return of funded projects. Measures to support Australian shipping would also:

- Build supply chain resilience and sovereign capability;
- Extract economic value from ownership/operating Australian ships – in part to reduce the more than \$10 billion annually spent on purchase of foreign shipping services, a large drain on the nation's balance of payments;

⁶ AMSA, Port State Control Report, p.19.

- Provide a core base load freight capacity in Australian ships so shippers (cargo owners) can secure long term contracts of affreightment (CoA) with Australian ship suppliers, and therefore retain domestic control or influence over matters such as those listed below, which cannot be achieved using a spot market:
 - Crewing quality
 - Safety – crew, ship and cargo
 - Maintenance and dry-docking schedules
 - Creating long term partnerships with service providers e.g. towage, mooring, provisioning, insurers, legal services, financiers; workers’ compensation and RTW providers; training providers, agents, freight forwarders etc.
 - Relationships with regulators
 - Decarbonisation strategies
 - Innovation and uptake of technology
 - Ship replacement cycles – long term investment plans.
- Building a maritime cluster as an anchor to give confidence for investment in related maritime activities and to encourage the growth of a maritime ecosystem of suppliers and support services – in the case of shipping, for bunkering and other ship provisions suppliers, repair and maintenance provision, crew supply provision, training provision, legal services (charter party) creation; ship chartering services; ship insurance and financing services etc.
- Enhancing maritime security e.g. strengthening Defence maritime capability and flexibility through closer integration with commercial shipping (particularly the strategic fleet) as acknowledged in the Defence Strategic Review, as well as better coordination of marine assets and workforces in Government shipping e.g. civilian crewed Defence, ABF, AMSA, Department of Environment and CSIRO ships; and
- Creation of Australian seafarer employment opportunities and maintenance of suitable ships necessary to maintain a supply of internationally qualified and licensed seafarers for the wider maritime industry, in both on-board and on-shore roles.

There is precedent for Australian ships being used for LNG exports while that industry was being established, with four Australian-flagged and crewed LNG tankers operated by the North West Shelf Shipping Company exporting LNG from the NW Shelf to Japan and China for 35 years (*Northwest Sandpiper, Northwest Snipe, Northwest Sanderling, Northwest Stormpetrel*).

Having these LNG-fuelled LNG carriers Australian flagged and crewed has significantly increased the contribution of the North West Shelf project to the Australian economy. Another reason shipping was included in the project is so that the seller could control the timing of offtakes, which was an integral part of managing the process of LNG production. Long-term offtake contracts underpinned the ships being chartered into the project and controlled by the LNG sellers.⁷ Similar contractual structures are expected in the hydrogen industry.

⁷ [Negotiating Australia’s first LNG export contract](#), Energy Today Magazine, December 2019. Accessed August 2023

First Nations

The MUA participated in establishing and supporting the work of the First Nations Clean Energy Network (FNCEN). The FNCEN is a network of First Nations people, community organisations, land councils, unions, academics, industry groups, technical advisors, legal experts, renewables companies and others, working in partnership to ensure that First Nations communities share in the benefits of the clean energy boom.

The FNCEN has developed Principles and Guidelines for the development of renewable energy, to ensure that country is protected and to make sure First Nations communities share the benefits of Australia's clean energy boom. The principles and guidelines should also be followed by renewable energy industries and the governments that regulate projects. The 10 principles cover such things as ensuring projects provide economic and social benefits, mutual respect, clear communication, cultural and environmental considerations, landcare and employment opportunities.

Treasury and the HPTI administrators should review these principles to ensure that the Aboriginal and Torres Strait Islander Best Practice Principles for Clean Energy Projects⁸ are required for funded projects.

In considering community benefit principles, it is important that the Department understand that both Australian Industry Participation Plans, and the Indigenous Procurement Policy (IPP) have not been effective, and the community and our unions have no confidence in these measures. However, there are reasonably effective measures developed by state governments. All of these state-based measures have had to negotiate Australia's international trade obligations.

Australian Industry Participation Plans were established in the Australian Jobs Act 2013, require corporations preparing a tender valued at \$20 million or more to map local industry, communicate with local suppliers, and outline how they will help Australian suppliers to develop their capability and integrate into supply chains. These are loose support requirements and not enforceable. There is no adequate inclusion of sea freight transportation in these Plans.

The Indigenous Procurement Policy (IPP) has targets for government purchasing from Indigenous businesses. The IPP states, however, Indigenous businesses only require 4% Indigenous employment and even this employment requirement can be sub-contracted out. The IPP does not result in secure, well-paid and skilled jobs for Indigenous workers.

In contrast, Australian states and territories have implemented a range of mechanisms to ensure community benefit principles apply to government funding mechanisms, primarily procurement.

⁸ First Nations Clean Energy Network, [Aboriginal and Torres Strait Islander Best Practice Principles for Clean Energy Projects](#), November 2022.

These have all been driven by the union movement. When it comes to practically implementing community benefits principles, unions are the experts.

The union movement is advocating that the three best Australian models for instituting these best practice principles are:

1. The ACT's *Secure Local Jobs Code 2020* (SLJC), including the Ethical Treatment of Workers' Evaluation (i.e. two-gate tender process), ensures that tenders are not determined on economic considerations at the expense of ethical considerations, so that ethical businesses are not forced to compete for tenders with businesses that contravene industrial, work health safety and tax law.
 - a. The SLJC places positive obligations on entities that hold an SLJ Certificate, in respect of matters such as freedom of association, recognition of the right to collectively bargain and workplace representative rights. An entity must hold a SLJ Certificate to quote for and perform territory funded work.
 - b. The Ethical Treatment of Workers' Evaluation assesses tenderers across their entire business on SLJC compliance and government reputational risk. A tenderer that passes this first gate proceeds to the second stage for assessment on other factors, such as price and timelines.
 - c. The certificate and ability to tender can be revoked by an independent Registrar if the tenderer does not maintain its positive obligations.
 - d. The Victorian *Fair Jobs Code* applies the same model and has specific policies to facilitate diverse workforces.
2. Local content targets, best demonstrated in the NSW *Renewable Energy Sector Board Plan*. This is the best model for navigating Australia's trade obligations while maximising supply chain opportunities in Australia.
3. The Best Practice Industry Conditions (BPIC), outlined in the Queensland *Procurement Policy 2021*. This sets best practice wages and conditions for specific industries, and departments then ensure every procured project meets these standards. The policy also stipulates local content targets.

Appendix A: Wincanton ammonia vessel safety record

Listed below are the safety defects found on board the Panamanian/Marshall Islands flag ammonia tanker the *Wincanton* by the Australian Maritime Safety Authority (AMSA), since 2018. The tanker carries ammonia between Newcastle and Gladstone.

Inspections & Detentions

Data as reported by Port State Control Authorities

AMSA	Follow up	2022-02-10	Newcastle (Australia)	Wincanton	Panama	Bureau Veritas	Jupiter Lease Sa
2 Defects: Fire safety - Fire pumps and its pipes (To be rectified before departure, Rectified) Fire safety - Other (fire safety) (Others, Rectified, Refer To Class Within One Week.)							
AMSA	Follow up	2021-10-27	Newcastle (Australia)	Wincanton	Panama	Bureau Veritas	Jupiter Lease Sa
2 Defects: Fire safety - Fire pumps and its pipes (To be rectified before departure, Rectified) Fire safety - Other (fire safety) (Others, Refer To Class Within One Week.)							
AMSA	Initial Inspection	2021-10-26	Newcastle (Australia)	Wincanton	Panama	Bureau Veritas	Jupiter Lease Sa
2 Defects: Fire safety - Fire pumps and its pipes (To be rectified before departure) Fire safety - Other (fire safety) (Others, Refer To Class Within One Week.)							
AMSA	Initial Inspection	2021-04-20	Newcastle (Australia)	Wincanton	Panama	Bureau Veritas	Jupiter Lease Sa
AMSA	Inspection	2020-12-01	Gladstone	Wincanton	Panama		Jupiter Lease Sa
3 Defects: Pollution Prevention - MARPOL Annex I - Other (MARPOL Annex I) (To be rectified before departure, Rectified.) Labour Conditions - Health protection, medical care, social security - Protection machines/parts (To be rectified before departure, Rectified.) Propulsion and auxiliary machinery - Other (machinery) (To be rectified before departure, Rectified.)							
AMSA	Follow up	2020-11-30	Gladstone	Wincanton	Panama		Jupiter Lease Sa
0 Defect: Labour Conditions - Conditions of employment - Other (Conditions of employment) (Master instructed to, Rectified, Repatriation conducted.)							
AMSA	Inspection	2020-09-16	Gladstone	Wincanton	Panama		Jupiter Lease Sa
1 Defect: Labour Conditions - Conditions of employment - Other (Conditions of employment) (Master instructed to, Arrange Repatriation by 29 October 2020 or earlier.)							
AMSA	Follow up	2020-03-03	Newcastle, NSW, Australia	Wincanton	Marshall Islands		Jupiter Lease Sa
0 Defect: Safety of Navigation - Monitoring of voyage or passage plan (To be rectified before departure, Rectified.) Safety of Navigation - Monitoring of voyage or passage plan (To be rectified before departure, Rectified.) Safety of Navigation - Bridge operation (To be rectified before departure, Rectified.) Other (SOLAS operational) (To be rectified before departure, Rectified.) Safety of Navigation - Voyage or passage plan (To be rectified before departure, Rectified.) ISM - Other (ISM) (Detainable deficiency, Rectified.) Pollution Prevention - MARPOL Annex V - Other MARPOL Annex V (To be rectified before departure, Rectified.)							
AMSA	Follow up	2020-02-22	Gladstone, QLD, Australia	Wincanton	Marshall Islands		Jupiter Lease Sa
0 Defect: Safety of Navigation - Monitoring of voyage or passage plan (To be rectified before departure.) Safety of Navigation - Monitoring of voyage or passage plan (To be rectified before departure.) Safety of Navigation - Bridge operation (To be rectified before departure.) Other (SOLAS operational) (To be rectified before departure.) Safety of Navigation - Voyage or passage plan (To be rectified before departure.) ISM - Other (ISM) (Detainable deficiency, Rectified.) Pollution Prevention - MARPOL Annex V - Other MARPOL Annex V (To be rectified before departure, Rectified.)							
AMSA	Detention-2 Days	2020-02-20	Gladstone, QLD, Australia	Wincanton	Marshall Islands		Jupiter Lease Sa
7 Defects: Safety of Navigation - Monitoring of voyage or passage plan (To be rectified before departure.) Safety of Navigation - Monitoring of voyage or passage plan (To be rectified before departure.) Safety of Navigation - Bridge operation (To be rectified before departure.) Other (SOLAS operational) (To be rectified before departure.) Safety of Navigation - Voyage or passage plan (To be rectified before departure.) ISM - Other (ISM) (Detainable deficiency, Rectified.) Pollution Prevention - MARPOL Annex V - Other MARPOL Annex V (To be rectified before departure, Rectified.)							

AMSA	Follow up	2019-11-21	Newcastle, NSW, Australia	Wincanton	Marshall Islands	Jupiter Lease Sa
2 Defects: Pollution Prevention - MARPOL Annex IV - Sewage treatment plant (Detainable deficiency, Rectified,) Water/Weathertight condition - Doors (To be rectified before departure, Rectified,)						
AMSA	Detention-1 Day	2019-11-20	Newcastle, NSW, Australia	Wincanton	Marshall Islands	Jupiter Lease Sa
2 Defects: Pollution Prevention - MARPOL Annex IV - Sewage treatment plant (Detainable deficiency,) Water/Weathertight condition - Doors (To be rectified before departure,)						
Tokyo MOU	Inspection	2019-04-30	Gladstone, QLD	Wincanton	Marshall Islands	Bureau Veritas
AMSA	Follow up	2018-11-14	Gladstone, QLD, Australia	Wincanton	Marshall Islands	Australia Gas As
0 Defect: Alarms - Other (alarms) (To be rectified before departure, Rectified,) Pollution Prevention - MARPOL Annex VI - Bunker delivery notes (To be rectified before departure, Rectified,) Fire safety - Fire fighting equipment and appliances (Master instructed to, Rectified, Rectified,)						
AMSA	Inspection	2018-10-16	Gladstone, QLD, Australia	Wincanton	Marshall Islands	Australia Gas As
3 Defects: Alarms - Other (alarms) (To be rectified before departure, Rectified,) Pollution Prevention - MARPOL Annex VI - Bunker delivery notes (To be rectified before departure,) Fire safety - Fire fighting equipment and appliances (Master instructed to, Rectify before cargo operation commences at this port.)						