

28 July 2023

Simplified Trade System Implementation Taskforce  
Via email: [business.engagement@simplifiedtrade.gov.au](mailto:business.engagement@simplifiedtrade.gov.au)

### **Re: Response to the Simplified Trade System Consultation**

Australia Post welcomes the opportunity to comment on the Simplified Trade System (STS) Taskforce's consultation paper. As a member of the STS Working Group, we endorse the Taskforce's vision to simplify rules, streamline processes, remove trade barriers, and modernise outdated ICT systems.

As a Government Business Enterprise, Australia Post is required to supply postal services both within Australia and internationally. Together with our key subsidiaries, we play an important role in the international supply chain, servicing more than 192 countries across the world. This work involves navigating Australia's cross-border trade ecosystem, with its many regulations and multiple regulatory touchpoints. It also involves meeting the varying requirements of Australia's subnational jurisdictions. Having to operate within this complex and fragmented framework can be challenging, costly, and time-consuming, so Australia Post welcomes the push towards an integrated, whole-of-government regulatory system.

#### ***A clear, efficient and easy-to-navigate digital platform***

As a significant industry player, we endorse the Taskforce's vision to undertake comprehensive regulatory reform, including the potential to develop an Australian Trade Single Window (ATSW). A single point of entry that harmonises procedures, standardises documentation, and enables trade and logistics partners to transact digitally, would significantly reduce compliance costs and administrative burden.

We recognise that implementing an ATSW would be a significant undertaking for the Taskforce and for Government more broadly but consider that it would offer the most practical benefits for business. Canada, New Zealand, and Singapore's single-entry systems are examples of international best practice that Australia could draw on. Common features across these systems include comprehensive digital platforms that facilitate trade and customer clearance processes; data reuse; paperless trade; and improved coordination between government agencies. Other features and benefits include:

- **Single access point:** A user-friendly, one-stop portal to submit and access trade-related documents and information, streamlining processes, reducing costs, and improving access to information for traders of all sizes.



Australia Post acknowledges the Traditional Custodians of the land on which we operate, live and gather as employees, and recognise their continuing connection to land, water and community. We pay respect to Elders past, present and emerging.

- **Digital trade documentation:** A digitally enabled system that accepts a wide range of documents, permits, and certificates, reducing duplication and administrative burden.
- **Integrated government agencies:** A single connection point between government agencies involved in trade facilitation, streamlining communication channels, and enabling faster clearance processes.
- **Real-time updates:** Real-time status updates on applications, transactions, clearance progress, and shipment tracking.
- **Compliance and risk management:** A single document/data repository will help regulators identify risks, improving customs enforcement and trade security.
- **Automated verification:** Using technology to verify authenticity, reduce data errors, improve traceability, ensure compliance, and speed-up processing.
- **Transparency and accessibility:** One door principle ensures that traders of all sizes and sophistication have access to credible and transparent information.
- **Integrated operational systems:** For use by government in the field to support activities associated with trade import and export.

#### ***Improved access to information***

Outside of developing an ATSW, the Taskforce could consider other reform initiatives to improve access to information. For instance, it can be difficult to find relevant updates on changing legislation, regulations, and customs procedures. Obtaining accurate information can be time consuming, and often requires consulting multiple sources. To improve this, the Taskforce could consider developing a single, online information portal that provides clear guidance on regulatory requirements, including upcoming changes. Being informed of proposed changes in advance of the date of implementation would ensure Australia Post and other businesses have the right systems and controls in place to comply with new and/or modified requirements.

#### ***Automating process, avoiding duplication, and enabling paperless trade***

There are several trade processes that use paper or scanned documents. For example, the notification by Border Agencies that a postal item has been cleared and can be released to Australia Post is a predominantly manual, paper-based process that would benefit from being automated. Similarly, for air cargo, communication with the Australian Border Force (ABF) and other government agencies is conducted via email. Australia Post sends 41,000 documents by email to the ABF and Department of Agriculture, Fisheries and Forestry each year to facilitate the release of cargo. This process is slow and inefficient. An integrated digital platform would significantly reduce duplication, improve efficiency, and cut costs for both the government and

industry. Noting it will be important for digitisation efforts to be coordinated across jurisdictions to ensure interoperability.

From a physical operating model within industry, the Government is still reliant on paperwork for bookings, inspection, and assessment of goods. Investment in technology to eliminate paperwork would not only benefit government and industry with efficiencies (time and resources) but would support seamless and faster clearances on the border as well as re-deploying resources to critical areas of focus within the trade environment.

### ***Digital identity services***

Australia Post supports efforts to set a nationally consistent approach for digital identity, making it easier for entities to understand their obligations and for users to have an informed understanding of how digital identity information is used and retained. We would also welcome opportunities to explore a federated model where digital identity services are able to redirect into solutions for digital identification.

Current trade-related processes require businesses to submit identity information to the government multiple times. This is duplicative, expensive and time consuming. A better solution would be to utilise existing digital identification capabilities, allowing businesses to prove identity once. Australia Post's Digital ID – our digital identity verification platform – meets the highest security accreditation standards. We want to support the government to develop a useful, trusted, and easy to use framework capable of streamlining current processes.

To discuss this submission further, please contact Greg Carroll, Head of Commercial Solutions, International Services, at [Greg.Carroll@auspost.com.au](mailto:Greg.Carroll@auspost.com.au).