

Good afternoon,

Please find below responses to some questions raised in the consultation paper.

Q1. Does the high-level vision for the future of cross-border trade align with the needs of business?

Broadly speaking I believe simplification is an idealistic endeavour and should be pursued wherever possible. (I.e. KISS principle) One of my main concerns would be security of any data shared with government and retained by government. I support a government approach which fosters voluntary compliance. The concept would only be viable if there was a serious investment by government in technology and systems though and I believe this has been a shortcoming of successive governments for many years now.

Q2. Which of these regulatory reforms would deliver the most practical benefits for business? Are there other reforms you would recommend we prioritise?

Border Controls and Service Standards would be the two key reforms which I believe would provide enhancements to cross border trade. By improving service delivery from government departments and streamlining border controls would be both a cost and time saver for industry.

Q3. What is your experience in understanding cross-border trade regulation? How accessible do you find this information? How can better guidance on regulatory requirements be provided?

As a licensed Customs Broker I have a deep knowledge of cross border regulation. Information accessibility varies across each government department. Some share information quite well E.g. ABF by updating websites and communicating regularly to industry whilst others have voluminous amounts of information they are trying to share but it mostly becomes unwieldy and difficult to navigate because of the volume . e.g. DAWE/DAFF
I believe government departments should put more effort into engaging with industry to share and obtain feedback on proposed changes to policy and procedure and then make every effort to simplify finding it via websites and industry notices.

Q6. What is your experience with paper-based and electronic records in how you interact in cross-border trade with the Australian Government?

My experience with paperless records and trade have been directly related to ABF and DAFF. The uptake or acceptance of e-documents has been quite limited and paperless trading has been in my experience simply related to how documents are submitted to these government departments negating the need to lodge hard copy documents.

Q10. Please describe your experience of the varying levels of administrative burden placed on your business in order to provide the information required to satisfy FPP tests.

I have experience with FPP tests relating to ABF and DAFF from the perspective of a licensed Customs Broker. I understand the necessity to establish a level of trust with regard certain government approved arrangements or licenses however I agree that government should be able to simplify this FPP process so that once established with one govt department it need not be duplicated with others.

Q12. Would you support your FPP test information being shared between relevant agencies and, if so, would there be any concerns or risks you'd want to see mitigated?

Personally I would accept FPP test information being shared between agencies under specific circumstances and subject to scrutiny. The data being shared should be accessible to the FPP applicant so any negative aspects can be identified and rectified where possible and the info should only be shared with the approval of the FPP applicant rather than a blanket sharing of information

Q13. How can we reduce the cost of cross-border trade administration?

Presently the cost of administration is spread across an ever increasing number of mechanisms such as import declarations , industry arrangements etc. This is a haphazard approach and government agencies should be able to collaborate and impose admin costs with transparency and equity in as few manners as is possible. I.e. Import declaration lodgement fees apply on a shipment by shipment basis and are more equitable than imposing a one fee fits all approach like the DAFF approved arrangement fees.

Q14. How can information on the tariff concession system be more accessible and what are the opportunities to simplify the tariff concession system?

The TCO system and application process could be simplified for both applicants and local manufacturers by simplifying and thereby making the threshold requirement simpler and clearer for all. A less regulatory approach to the language contained within TCOs could be adopted and the ABF could take a less adversarial approach to the interpretation of TCO wording.

Q15. Are there any border controls that you consider have a high regulatory burden on your business?

The DAFF "Sites operating under an approved arrangement" provide a high regulatory burden on our business. As a renewables business importing equipment all around Australia the approved arrangement system is inadequate to provide a clear and simple mechanism where industry can implement an "approved site" based on industry need and that also meets the risk to be managed by DAFF.

Q17. Are there any specific border controls that could be streamlined?

The DAFF inspection system is also a high regulatory burden for industry as they are constantly short staffed and fail to meet to ongoing needs of industry to have timely and affordable inspections as and where required. DAFF should look at adopting an outsourcing of inspection services to suitably trained/qualified service providers.

Q24. What benefits might Australian businesses see from a streamlined cargo intervention model? What data can you share with us about your experience with the current model?

As outlined above the impact of DAFF processes can be very costly to industry due to lack of staff and poor customer service standards resulting in delays and increased cost to industry from storage costs etc.

Q25. What opportunities do you see for industry collaboration and involvement in co-design of the cargo intervention model?

Increased engagement with industry can only serve to improve the cargo intervention model. Industry collaboration could provide for a more flexible and less costly system.

We are keen to hear about any other issues you would like to raise in the context of streamlining and simplifying Australia's cross-border trade environment.

At the heart of this discussion is a willingness of government to listen and then invest appropriate funding into development of improved systems and processes.

Thank you