



CONFERENCE OF ASIA PACIFIC EXPRESS CARRIERS

24 April 2008

The Chairman
Quarantine and Biosecurity Review
GPO 858
Canberra ACT 2601

Dear Sir,

The Conference of Asia Pacific Express Carriers (CAPEC) represents the interests in Asia Pacific of the world's leading integrated express delivery service companies FedEx, DHL, UPS and TNT

Introduction

The Terms of Reference (TOR) of the Quarantine and Biosecurity Review refer to "responsibility shared between the different layers of government, importers, exporters and the community" and the 1996 Nairn Review of quarantine.

This CAPEC submission is intended to focus on the "Shared Responsibility" concept and specifically on recommendation 62.

CAPEC is a member of the AQIS Industry Cargo Consultative Committee the peak body established in December 1993 to provide a consultative mechanism between AQIS and the industries engaged in international logistics and trade

Shared Responsibility

Recommendation 62 of the Nairn Review indicates "*The Review Committee recommends that AQIS liaise closely with the Australian Customs Service to ensure that customs electronic information systems meet Australia's quarantine requirements, including for the quarantine inspection and clearance of cargo*"

In 1998 CAPEC actively participated in a project with AQIS that was designed to be a co-regulation program with the objective of fulfilling recommendation 62 as it related to the Air Express industry. This project included specific and detailed training of industry members which was delivered in late 1998 in anticipation of the implementation of the project in early 1999 which did not eventuate

Since 1999 there have been many attempts by Express Carriers to revitalize this initiative without success. CAPEC hold the view that the failure of introducing this scheme was due various factors some of which we have listed below;

- High staff turnover with AQIS senior and program managements;
- Lack of desire to "share responsibility" in this activity area;
- Lack of commitment;
- Very Conservative thinking and approaches to risk management;

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- Heightened border related issues (Increased Quarantine Intervention); and Public issues associated with other Co-regulatory (CR) or Compliance Agreements (CA)

CAPEC believes that this industry is perfectly capable to perform the originally agreed low risk quarantine functions under a Compliance Arrangements and that this would be mutually beneficial in addressing facilitation and risk management.

Any scheme must be underpinned by “informed compliance” requires training and subsequent duly accredited personnel. The application of Quarantine Approved premises (QAPS’) and the current accredited person’s regime already in place supports this approach. CAPEC members operate QAP’s around Australia and employ AQIS accredited persons to attend to certain quarantine functions.

CAPEC members have demonstrated their commitment to managing risk at the border by agreeing to have X-ray equipment installed at their premises to facilitate AQIS to achieve Government prescribed intervention targets of the Increased Quarantine Intervention in 2001. Additionally CAPEC members, as part of the then Government’s IQI initiatives, undertook extensive and highly successful quarantine awareness campaigns overseas aimed at shippers correctly declaring consignments which has seen the interception drop from .85% in 2001/2 to .02% in 2006/7..

In early 2004 it was agreed that a “Post Implementation Review” of the IQI initiative in the HVLV area be conducted and the report dated May 2004 provided the following recommendations;

1. Recommendation:

That ACS and AQIS co-ordinate a joint approach for HVLV air cargo intervention by ACS officers screening HVLV air cargo on behalf of both agencies and AQIS officers acting only on those items of quarantine interest.

2. Recommendation:

That the air courier industry advise AQIS regarding the level of support they would provide for the feasibility of a co-regulation arrangement being developed for screening HVLV air cargo.

3. Recommendation:

That physical inspection rather than detector dogs be used to validate HVLV air cargo screening effectiveness.

4. Recommendation:

That detector dogs be redeployed to areas of higher quarantine risk.

5. Recommendation:

That AQIS explore all electronic options to improve the efficiency of data transfer and processing documentation for air couriers.

6. Recommendation:

This utilisation of resources be monitored to ensure an effective and efficient reduction of quarantine risk in the identified pathways. That those AQIS officers that are re-deployed from HVLV air cargo intervention be directed to areas of higher or unknown quarantine risk.

CAPEC members supported these recommendations and advised AQIS of their desire to pursue a co-regulatory agreement in line with recommendation 2. These discussions commenced again in 2004 at the Quarantine Market Access Seminar in Canberra and continued for some years without any definitive outcome. Discussions have since ceased as it has become clear that AQIS was moving away from entering into co-regulatory schemes in favour of prescriptive processes which left little room for progress. .

CAPEC welcomes the review of Quarantine and Biosecurity and urge that as a part of the review that a robust governance system be recommended to ensure implementation of the above recommendations

Yours sincerely,



Geoff Clark
Chairperson

CAPEC represents Australia's four major express carriers - DHL International (Aust) Pty Ltd, TNT Australia Pty Ltd, Federal Express (Aust) Pty Ltd and UPS Pty Ltd.