



AUSTRALIAN INTERNATIONAL MOVERS ASSOCIATION

REPLY TO:

Ray Cannan
Chairperson, Industry Liaison Committee
C/- Allied Pickfords
202 Greens Rd.
Dandenong 3175 Victoria.

30 April 2008

The Chairman
Quarantine and Biosecurity Review
GPO 858
Canberra ACT 2601
Dear Sir

The Australian International Movers Association (AIMA) represents the majority of companies that provide services related to the movement of used Household and Personal Effects into and out of Australia.

Within our membership we handle approx. 85% in volume terms of Household and Personal Effects shipments within Australia. Due to the specialist nature of our members' activities, they are deemed to be High Volume Specialist Operators (HVSO's) by both the Australian Customs Service and the Australian Quarantine Inspection Service (AQIS). All AIMA members are affiliated with the International Federation of International Furniture Removalists (FIDI) and all hold FIDI/FAIM accreditation. This is an industry specific accreditation and is externally audited by Ernst & Young on a Bi annual basis.

AIMA is also a member of the Industry Working Group on Quarantine (IWGQ) and fully supports its submission to the Review

AIMA has a long history of working together with AQIS with the aim of identifying and introducing efficiencies into the clearance process and making best use of the available resources to ensure the Continuum of Quarantine functions well within the Household Goods and Personal Effects industry.

Our first serious efforts began in 1992 with a series of discussions that were intended to review the then current practices and processes with the view to identifying inefficiencies and allowing the sharing of the Quarantine responsibility with our members on the basis that they were an inherent part of the physical handling and examination process.

Whilst there were ongoing discussions from that time, and agreement to rationalisation from some sections with AQIS, no real progress or gains were achieved at that time.

The recommendations arising from the 1996 Nairn Review of Quarantine produced the framework that allowed a more formalised approach to reviewing the examination and clearance processes related to Household and Personal Effects consignments. A number of working parties were established which led to the creation of a joint AQIS/ACS working party charged to undertake a National Review Of Unaccompanied Personal Effects Policy And Procedures.



Considerable resource and effort was placed into this review which ultimately led to the identification of a number of functions that were able to be performed by industry. The findings of the working party were formalised into a draft document "Recommendations for Scope of Functions to be Carried out by Household Goods and Personal Effects Movers under AQIS and ACS Co-regulation agreement document" in October 1999.

A response to this document was prepared by AQIS in February 2000, which in general terms aligned and endorsed the proposals of the Recommendations document. Given this situation processes were developed and procedures written with appropriate training requirements identified and documented, with a successful audited trial process being conducted through one of our members Sydney operations.

Given the success of this trial the agreed process and requirements were formalised which were to form the basis of the co regulation agreement between AQIS and High Volume Specialist Operators handling Household and Personal effects consignments. This activity culminated in a meeting in Canberra on 27th July 2001 between Industry and AQIS where the co regulation agreement was intended to be ratified however during the course of that meeting several AQIS representatives reversed their intention and effectively quashed the entire program. Following this AIMA lodged a number of protests through the IWGQ however there was no apparent effort on the part of AQIS to overrule the decision taken at the 27th July 2001 meeting.

It is worth noting that, in anticipation of the scheme being introduced, the IWGQ prepared an accreditation training course for delivery through its Guardian e-learning system in 2001.

Subsequent to these events a Discussion Paper was prepared and submitted through the Cargo Management Co Regulation Steering Committee which led to further discussions and reviews which resulted in further physical observance of processes and procedures at a number of our members' facilities during September 2003. The Cargo Management Co regulation Steering Committee indicated that AQIS would allocate resources to re examine the procedures applied in the Household and Personal Effects Industry, with the indication that resources were expected to be available in May 2004. The item has remained on the agenda of this group however no meaningful re-examination of process review has been forthcoming.

The intent of our organisation has not changed at any point during this time. Our members are intrinsically involved in the handling process of this commodity and believe the argument that our membership is ideally positioned and capable of assuming part of the Quarantine Continuum is as valid today as it was back in 1992 when we first embarked on this project. The reality is that our membership actually undertakes the majority of the work that is required in the physical processing of Household and Personal effects consignments and identifies any Quarantine risks on a daily basis. The high levels of AQIS physical intervention is a duplication of effort and results in higher handling and AQIS fee costs and delays to importers, who are families and individuals who are simply seeking prompt access to their own personal belongings. It is also, in the opinion of AIMA, a less than efficient use of skilled AQIS resources

An untapped ability to move some of the Quarantine risk offshore is also available through our membership under the guidance of the FIDI/FAIM accreditation process. This accreditation is clearly documented and as mentioned previously is independently audited. We believe it is possible to include an "Australian Quarantine" component onto this standard which would document the process required to ensure the application of Australian Quarantine requirements at the time of the goods being packed and loaded in their country of origin. AQIS have repeatedly ignored this opportunity in all our discussions with them.

From our observations, since the middle of 2001 AQIS have moved away from the view that co-regulation and shared responsibilities should be the platform for the enforcement of Australia's Quarantine philosophy and have instead relied on ever increasing intervention levels to the detriment of cargo handling efficiencies.

AIMA welcomes the review of Quarantine and Biosecurity and urges the review panel to consider the ability of responsible industry to ensure the continuum of Quarantine, utilising the resources that industry has available to it.

Yours Sincerely

A handwritten signature in blue ink that reads "Ray Cannan". The signature is written in a cursive style with a large initial 'R'.

Ray Cannan
Industry Liaison Committee
Australian International Movers Association