

serving INDUSTRY

The Customs Brokers and Forwarders Council of Australia Inc. (CBFCA) represents business and individual service providers within the barrier clearance and international freight forwarding industry. The CBFCA not only meets the professional demands of its members but also serves both members and industry interests in dealings with:

- Australian Customs Service
- Australian Quarantine and Inspection Service
- Department of Transport and Regional Services

- Federal and State Government Regulatory Authorities
- Relevant Industry Associations, and
- Service Providers in the Trade Logistics Chain

The prime objective of the CBFCA is to represent members' interests in the trade logistic service industry and to promote the professional development of its individual members through training. The CBFCA functions as a peak industry body and voice for importers, exporters, manufacturers and other associated groups concerned with international trade.

Other CBFCA objectives include:

- to act as National representative body on behalf of its members for the purpose of promoting the manufacturing and industrial resources of Australia
- to promote trade and commerce between Australia and other countries by assisting and advising manufacturers, producers, industrial groups and persons involved in international trade and commerce
- to improve, elevate, collect, analyse and disseminate general knowledge of information concerning international trade & commerce



ELECTRONIC BUSINESS

Innovation

Australia is at the cutting edge of electronic commerce usage. Indeed, it is acknowledged by regulatory authorities worldwide that this country is further advanced than many others.

CBFCA's innovative website ensures communication with its members is maintained in a timely and efficient manner. The website enables interaction with members by way of workshop and seminar registration along with maintenance of member details. A feature recently introduced makes CBFCA Web Communicator articles accessible for member client e-newsletters.

For the future, further innovative processes will be added to increase communication and interaction with members to keep abreast of the ever changing Electronic Communication World.

trade logistic

SERVICES

Members of the CBFCA are specialists in barrier clearance and international freight forwarding and are indispensable facilitators skilled in helping clients achieve the most cost effective way to participate in international trade.

The CBFCA through its own training and professional development programs ensures that members maintain a comprehensive knowledge of appropriate national and international legislation. It is a professional obligation of members of the CBFCA to maintain competency through CBFCA professional development programs.

In meeting the respective barrier clearance or international freight forwarding requirements, a need exists for corporate members to meet the informed compliance requirements of government and regulatory authorities so as to ensure they provide the appropriate level of professional service as trade facilitators in a global context.

communicate

trade logistic MANAGEMENT SERVICES



ITALC

INTERNATIONAL TRADE
AND LOGISTICS COLLEGE

IMPORT SERVICES

- Customs Valuation of Goods
- Documentation Requirements
- Duty Rates & Tariff Classification
- Feasibility Costing Studies
- Legislation Advice
- Marine Transit Insurance
- Overseas Order Monitoring
- Refund of Duty and Goods & Services Tax (GST)
- GST Rulings
- Tariff & Valuation Advice Applications
- Warranty & Reimported Goods
- Air & Sea Freight
- Transport, Storage & Distribution
- Customs & Quarantine Securities

EXPORT SERVICES

- Air & Sea Freight
- Documentation Requirements
- Drawback of Duties
- Export Entries
- Export Permits
- Feasibility Costing Studies
- IATA Dangerous Goods Regulations
- Marine Transit Insurance
- Methods of Payment & Export Finance Information
- Export Market Development Grants
- Other Export Incentives
- Transport, Storage & Distribution

SPECIALIST SERVICES

- Administrative Appeals Tribunal Applications
- Banking, Finance & Methods of Payment
- Excise, Bounties & Anti-Dumping Assessments
- Import/Export Trade Consultants
- Foreign Currency Advice & Rates of Exchange
- Free Into Store Costing Assessment
- INCOTERMS Analysis
- Productivity Commission Inquiries & Submissions
- Tariff Concession & By Law Applications

Services also extend to dealings with Government and regulatory authorities such as:

- Australian Customs Service
- Australian Quarantine & Inspection Service
- Department of Transport & Communications
- Australian Nature Conservation Agency
- Department of Primary Industry and Energy
- Department of Community Services & Health
- Austrade
- Ausindustry
- Export Finance Insurance Corporation
- Australian Taxation Office

In addition members maintain working relationships with shipping and airline companies, ports, harbour/marine authorities and other industry associated service providers.

One measure of industry professionalism is importance attached to high standards of proficiency among members and the CBFC strives for professional excellence through its Professional Development Program. It has established accreditation and training programs covering:

COMPETENCY-BASED TRAINING

CBFCA members, like all specialist, need ongoing training to keep up with changes in the barrier clearance and international freight forwarding industry. Members undertake a prescribed number of hours of accreditation training.

VOCATIONAL TRAINING

Vocational training is offered to those interested in embarking on a career in the barrier clearance and international freight forwarding industry.

COMMUNITY AWARENESS

The CBFCA also provides training on a wide range of barrier, international freight forwarding and international trade related topics to Government, industry, importers and exporters. Short courses and seminars are targeted at senior and middle management active in purchasing, supply, contract, administration and finance.

- Saving on opportunity cost, travel time, travel costs and accommodation
- Real value for money
- Reduced training time
- Increased retention
- More freedom and empowerment
- Learning

FACT SHEET



CBFCA

A U S T R A L I A

Communicate. Innovate

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The Customs Brokers and Forwarders Council of Australia Inc. (CBFCA) is a peak industry association of service providers to international trade logistics and supply chain management.

The CBFCA can trace its origins back to the Customs and Transport Agents Association, New South Wales formed in 1904. The CBFCA represents members in an ever changing industry where over two hundred and fifty (250) companies employ in excess of eight thousand (8000) people Australia wide.

The CBFCA is recognised by Government and regulatory authorities as the peak industry body for logistics service providers in international trade logistics. Membership of the CBFCA is open to both business and individuals.

Participation in the development of government and regulatory policy procedure and industry related activities is undertaken at both National and State levels and is a key feature of the CBFCA's activities.

The CBFCA's key objective is to, *inter alia*:

- act as a National representative body on behalf of members;
- promote trade and commerce between Australia and other countries by assisting and advising manufacturers, producers, industrial groups and persons involved in international trade and commerce;
- improve, elevate, collect, analyse and disseminate general knowledge of information concerning international trade and commerce;

- represent, promote and protect the interest of the industry;
- assist with vocational training for the barrier clearance and international freight forwarding industry.

The CBFCA has a National and State focus and meets with regulatory authorities such as the Australian Customs Service, the Australian Quarantine and Inspection Service, other industry associations and industry service providers.

The CBFCA also provides for the training of customs brokers through the delivery of the National Customs Brokers Course. This course meets the requirements of the Australian Customs Service as the prescribed course of study under Part XI of the Customs Act 1901

CBFCA members as service providers in international trade logistics and supply chain management ensure that they are continuously updated of changes in the barrier clearance and international freight forwarding issues.

The CBFCA is committed to providing to its members and industry competitive advantages in international trade logistics.

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Interested to learn more about CBFCA and its members?

If so contact the CBFCA office in your Region for membership opportunities.

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INDUSTRY REPRESENTATION

The Customs Brokers and Forwarders Council of Australia Inc. (CBFCA) represents its members and industry in a diverse spectrum of international trade logistic committees, forums and discussion groups. The following is a cross section of that representation and further information in relation to the forums is available from the CBFCA.

INDUSTRY/GOVERNMENT COMMITTEES/FORUMS

- Asia Pacific Economic Co-operation Committee on Trade and Investment and Sub Committee on Customs Procedures
- Australian Customs Service (Customs) Strategy Committee
- Australian Dangerous Goods Air Transport Council
- Australian Logistics Council
- Australian Quarantine and Inspection Service (AQIS)/Industry Cargo Consultative Committee
- Cargo Management Re-Engineering Industry Reference Group
- Customs National Consultative Committee
- Federation of Asia Oceania Customs Brokers Association (Vice Chair)
- ICS Action Group
- Industry Working Group on Quarantine
- Integrated Cargo System User Management Committee
- International Air Transport Association South West Pacific Cargo Executive Council
- International Federation of Customs Brokers Associations (IFCBA) (Board Member)
- National Customs Brokers Licensing Advisory Committee (Member)
- Office of Transport Security (OTS) Aviation Security Working Group
- OTS Maritime Security Working Group
- OTS Regulated Air Cargo Agent Working Group
- State Airport Operation Committee(s)
- State Chamber(s) of Commerce
- State Customs and AQIS Liaison Committee(s)
- State Port Users Working Groups
- The International Air Cargo Association
- Tradegate Australia Limited (Board Member)
- Tradegate Development Fund Management Committee
- World Customs Organisation (Observer on behalf of IFBCA)

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Ref No:

17 April 2008

Mr A Hosking
National Manager Enhanced Trade Solutions
Australian Customs Service
5 Constitution Avenue
CANBERRA ACT 2600



Dear Andrew

Workshop - Customs Strategic Outlook 2015 and

A Proposal for Enhanced Trade Solutions 2015 Consultation Draft

Thank you for providing the opportunity for the Customs Brokers & Forwarders Council of Australia Inc. (CBFCA) to participate in the above referenced Workshop in Sydney on 8 April 2008.

In response to the Australian Customs Service (Customs) requests at the Workshop for comments on the Customs Enhanced Trade Solutions 2015 (ETS 2015) the CBFCA would, in the first instance, commend Customs for the initiative of bringing together industry participants to address a future strategy on regulatory interdiction and border control in relation to Australian international trade.

The CBFCA's sees the Consultation Draft as an aspirational document where many referenced issues are seen as *self evident truths* and are identified trends or issues under consideration, or implementation, by customs administration in other economies (as they focus on regulatory and industry needs for the future in international trade).

The CBFCA sees as a key objective of the ETS 2015 (as also for other customs administrations) the need for uniformity, consistency and transparency in regulatory intervention in international trade and the need for principles referenced in ETS 2015 to be international standards rather than implemented through bi-lateral or multi-lateral agreement(s).

Any aspirational or strategic document need the appropriate *reality test* and it is appropriate for Customs to further refine ETS 2015 before presentation to Government. The CBFCA offers the following comments on ETS 2015 for Customs' deliberation before any CBFCA endorsement of the document.

A Single Window

The CBFCA notes in ETS 2015 that Customs will play a central role as advisor to Government in relation to the ETS 2015 environment which includes standardised data to facilitate, *inter alia*, "the more efficient

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*exchange of information between other Government regulators and international customs administrations."*¹

As to the convergence of these functions to a Single Window data exchange a need will clearly exist for Customs to partner with other Australian regulators in the development of an Information Technology (IT) platform which will give effect to the data needs of all parties to the Single Window concept in that the issue is not solely about Customs compliance requirements but more so the broader range of regulatory intervention at the border.

Such a position will inherently require Customs to have a wider range of understanding and consideration of other regulatory agencies requirements rather than a Customs only requirement for IT and data requirements.

The IT requirements for the future, in the opinion of the CBFCA, will have a wider reach than those currently the responsibility of Customs through the Integrated Cargo System (ICS). Without the appropriate *buy in* of other regulatory agencies the ETS 2015 will struggle to meet its potential.

Industry as to regulatory interface (and compliance issues) see no need to have a variety of IT solutions to meet a hybrid of regulatory agencies border information requirements.

Where a Single Window is supported by industry in the simplicity of the phrase *Single Window* however lies the complexity and this complexity should not be misunderstood or misjudged in the ETS 2015 as recent Customs history shows the difficulty of the IT task as well as the inherent costs to industry.

Cross Border Shipments Feasibility Study

The Customs Cross Border Shipments Feasibility Study references the World Customs Organization (WCO) Unique Consignment Reference (UCR) and the use of Radio Frequency Identification (RFID) technology. The CBFCA raises for Customs consideration the opportunity for Customs to influence UCR standardisation rather than give tacit acknowledgement to the splintering of the UCR concept from that originally envisaged by the WCO [Information Management Sub Committee (IMSC)].

While the IMSC has undertaken considerable and valuable work on the UCR the concept and philosophy of the UCR is now, in the opinion of the CBFCA, severely compromised by the UCR being taken as *any number* (because of uniqueness) as a UCR.

The concept of the UCR was for it to be determined at the instigation of the contract of sale between the buyer and seller (which in the international context would emanate from the provisions of the United Nations Convention on the Sale of Goods). The UCR can now be a number which relates to the carriage of goods (noted during the Workshop by certain international carriage providers as being a consignment note, an airway bill or the Serial Shipper Container Code). This undermines UCR uniformity and consistency.

The IMSC UCR Correspondence Group for its meeting on 4 June 2008 has noted the break up of the UCR concept and has flagged a return to the 1997 concept.

International trade will have little interest in bi-lateral arrangements to use UCRs where economies may have different UCR requirements and this inherent cost burden on industry would see, in the opinion of the CBFCA, marginal uptake to the UCR process.

A need clearly exists for Customs to support UCR standardisation through the WCO IMSC and move quickly to reverse the *"any number will do"* as a UCR.

¹ P3 *A Proposal for Enhanced Trade Solutions 2015, Australian Customs Service 2008*

The UCR fragmentation is seen as an example of the continuing lack of uniformity and consistency on issues from many customs administrations and the apparent lack of support to the WCO Revised Kyoto Convention on key customs process standards.

While the UCR may, as referenced in many customs circles, be the *electronic staple* it is not the *silver bullet* in relation to data exchange. From the CBFCA perspective the UCR needs considerable attention by Customs and counterpart customs administrations. The CBFCA would suggest this should be noted in the ETS 2015.

Authorised Economic Operator

The Authorised Economic Operator (AEO) concept (driven out of the WCO) is endorsed by the CBFCA as particular merit for regulators and industry is seen in its implementation. There are however variations on the AEO concept. The CBFCA notes that the AEO in the European Union context allows for a compliance, security or compliance / security option and the CBFCA would see the compliance / security model as most beneficial to both regulators and industry in Australia.

The CBFCA is also of the opinion the AEO is not just about Customs requirements but also as to the needs of the Office of Transport Security (OTS), Australian Quarantine and Inspection Service (AQIS) and any other key agency at the border.

The AEO therefore needs to be holistic and, this in itself, will challenge the development of the AEO framework. There is however significant work being done, or having been done, on the AEO of which will be of benefit to Customs and industry in Australia.

The roadmap agreed between the United States Customs and Border Protection (USCBP) and European Commission on 31 March 2008 will provide a further basis for Customs in its development of the AEO concept.

As Customs will be aware the AEO is underpinned by the principles of the UCR and the Standardised Data Set. The AEO will also need Government / political endorsement as well as administrative credibility.

Legislative Reform

To achieve these objectives *legislative reform* and Customs modernisation are, in the opinion of the CBFCA, mutually inclusive. The Customs Act 1901 is now a document of considerable complexity which does not provide appropriate positioning for Customs in terms of the AEO, UCR and other key requirements referenced in the ETS 2015.²

The CBFCA raised with Customs in the recent legislative review [stemming from the Customs National Consultative Committee (CNCC)] the need for the Customs Act to be modernized. The response received at that time was that it was not on the Government agenda and would require considerable resources. The CBFCA sees that ETS 2015 can put this reform on the agenda.

The Law Reform Commission Report No. 60 is now such a distant memory that the work undertaken at the time is no longer credible. However if Customs wishes to move towards ETS 2015 (and perhaps even 2020) Customs legislation reform is required to support that implementation.

ETS 2015 endorsement must, as part of its package of measures, address customs legislation modernisation.

Gateway Clearance

² P44 A Proposal for Enhanced Trade Solutions 2015, Australian Customs Service 2008

The ETS 2015 raises the issue of *Gateway Clearance*³ and the CBFCFA sees a definition of, or concept of, *Gateway Clearance* needs to be clearly articulated to industry particularly in terms of the clearance of goods at the gateways where such clearance requires quarantine commodity and non-commodity intervention.

The May 1995 Report, to the then Customs Advisory Board, by the *Gateway Clearance and Mandatory Electronic Reporting in Industry Panel* is, for industry, the only public document and / or report which provides specific direction or commentary on *Gateway Clearance*.

The CBFCFA perceives it would be of benefit to again examine the 1995 Report to determine the validity of the issues raised and as to any requirement to be addressed in moving to a *Gateway Clearance*.

What should be noted in the 1995 Report however is the lack of reference to, or consideration of, other regulatory agencies needs or requirements. As such the CBFCFA sees the 1995 Report as a reference document for discussion between other regulatory agencies and industry on the *Gateway Clearance* concept.

Cost Recovery

As raised at the Workshop the aspect as to cost recovery of any of the ETS 2015 issues is not referenced. While comment was made as to a cost benefit analysis on issues the CBFCFA sees that it may be difficult to undertake such an appropriate cost benefit analysis before undertaking a trial or the commitment of significant resources, either financial or human, to a project. An example of resource commitment was the work undertaken on the Advanced Cargo Reporting which is indicative of the level of resources needed to work towards Customs outcomes.

What must be referenced in ETS 2015 however is the philosophy of Customs in relation to cost recovery of the considerable resources which would be required to undertake many of the ETS 2015 activities.

Industry is mindful as to the Government's position as to fee for service or cost recovery requirements. Industry also understands the need for Government to determine community service obligations as against fee for service. To the CBFCFA much of the ETS 2015 work is seen as meeting budgetary and community service obligations rather than cost recovery.

As Customs will be aware the underlying principle of user pays / cost recovery was referenced in the Productivity Commission Report Cost Recovery by Government Agency 2001 (PC Report).

The impact of the PC Report on ETS 2015 may need appropriate commentary as to the principles Customs proposes to adhere to especially as the ETS 2015 requirement as to advanced export data and any outcomes from the United States Customs and Border Protection (USCBP) on 100% scanning of export cargo. The Government's philosophy of regulatory charges applicable to exports will also need to be addressed in this context. For example at this time the CBFCFA understands any export container examination or x-ray costs are not to the account of that process but are recovered through the import declaration process.

Small Shipments and Faster Clearance

The CBFCFA notes in the ETS 2015 the brief comment in relation to the dramatic increase in the number of small shipments.⁴ The issue is not necessarily about the dramatic increase in

³ P9 A Proposal for Enhanced Trade Solutions 2015, Australian Customs Service 2008

⁴ P14 A Proposal for Enhanced Trade Solutions 2015, Australian Customs Service 2008

the past ten (10) years but more so from the position taken by Government, and the impact of that decision in terms of its introduction on 12 October 2005, of the Self Assessed Clearance (SAC) process.

Without addressing the decision making process and transparency of same the CBFCA is of the opinion that the SAC will create, for regulatory agencies in terms of appropriate profiling and compliance requirements, one of the greatest challenge for the future.

The CBFCA struggles to comprehend how Customs, quarantine and other compliance requirements are now determined on the basis of the value of a consignment rather than the risk. The rationale for this determination, in the opinion of the CBFCA, fails to address compliance principles and good governance.

Parties charged with the responsibility of reporting the carriage of, and importation of, such value threshold consignments into Australia, whether it be a postal authority or express handler context, have the IT capability to adequately capture full, or in short form, the data required for Customs and other regulatory agencies to profile consignments.

Customs' own internal Non Compliance reports point to issues arising with the SAC process and on the basis that the ETS 2015 is about appropriate whole of Government / *Single Window* intervention for security and other requirements the CBFCA's position is that the SAC process undermines those regulatory compliance requirements. The CBFCA believes Customs needs to reassess the SAC in terms of intervention and the rapidly changing world of internet commerce.

The on going argument between parties as to similarity of treatment (especially as to SAC arrangements) was referenced in the Workshop as *differentiation*. *Differentiation* is not about diminution of compliance requirements based upon size and / or economic position. *Differentiation* can be recognised where compliance outcomes in technology and / or processes compliments compliance requirements.

In addition to the compliance outcomes the CBFCA notes to Customs other issues from the SAC process including:

- revenue leakage, and
- retailing / purchasing trade distortions

While these key issues may not necessarily be in purview of Customs they are certainly those of Government and need to be addressed within the context of ETS 2015.

Other Issues

There are other issues, in relation to the ETS 2015, on which the CBFCA would be happy to provide comment and further direction including, *inter alia*:

- standardised data set
- IT standards for private sector interface
- mutual recognition
- compliance continuum, and
- human resource impacts and industry meeting compliance requirements

To this end the CBFCA sees that it may be of benefit for Customs to undertake bi-lateral discussions with industry sectors so as to test the validity of outcomes from the Workshop in an industry sector rather than a whole of industry arrangement.

The CBFCA would be happy to participate with Customs on such bi-lateral discussions.

Kind regards

A handwritten signature in black ink, appearing to read 'SJM', with a long, sweeping flourish extending upwards and to the left.

STEPHEN J MORRIS
Executive Director



Australian Government
Australian Customs Service

A Proposal for Enhanced Trade Solutions 2015 Consultation Draft

A companion document to the
Customs Strategic Outlook 2015

- Drivers of Change – Outlook to 2015
- Vision for 2015
- Implementation

March 2008

A Proposal for Enhanced Trade Solutions 2015

This consultation draft of *A Proposal for Enhanced Trade Solutions 2015* serves as a companion document to the *Customs Strategic Outlook 2015*, outlines the current trading environment and explores global drivers that are expected to influence the future of international trade. It also proposes solutions to border management challenges to the year 2015 and outlines, subject to government endorsement, an implementation strategy.

Growth in international trade is being driven by increasing wealth especially among developing countries, reduction in trade barriers, improvements in transportation, globalisation of industry and improvements in information technology. As a result, containerised cargo is projected to increase at an annual rate of 5-6%, leading to a 70% increase by 2015.

Supply chain infrastructure such as wharves, airport cargo areas, hubs and transport links are being placed under pressure by this burgeoning level of international trade. The dynamics of international trade have been equally impacted by an increased focus on border security.

These developments have shone a light on both the efficiency and effectiveness of the regulatory arrangements for managing international trade. Critical

to that is how well they balance border security requirements with support for legitimate trade.

Handled poorly, they can become a barrier to our international competitiveness or leave the community exposed to unacceptable risks. Handled well they promote Australia's competitiveness and security.

In this environment, the regulatory arrangements for managing international trade are as much a part of Australia's critical trade infrastructure as are our ports and transport networks.

The initiatives outlined in this consultation draft, in large measure, reflect a coalescing view around directions for international trade and trade regulation. How they develop in practice is less clear.

Our objective is to ensure industry and government agencies are engaged early in jointly considering the impacts of these developments so as to best position Australia to benefit from them.

We would appreciate your feedback on this consultation draft and any views you may have on further improvements. If you would like to provide comments contact us at ITSW@customs.gov.au.



Michael Carmody,
Chief Executive Officer

