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Submission to the Australian Border Force
Future Cargo Reporting Discussion Paper
July 2026

Freight & Trade Alliance (FTA) and the Australian Peak Shippers Association (APSA) welcome the Australian Border Force's review of Australia's cargo reporting framework.

The following content is based on initial member feedback outlining key principles and providing preliminary responses to questions raised in the *Future Cargo Reporting Model Consultation Paper* released in June 2026.

Executive Summary

As outlined in previous submissions to the Simplified trade System (STS) review, FTA and APSA see a need to fundamentally redesign Australia's cargo reporting model, rather than simply modernising existing technology.

Australia's reporting systems have evolved from paper documentation to COMPILE, Interim EDIFICE, Air Cargo Automation, Sea Cargo Automation, EXIT and ultimately the Integrated Cargo System (ICS).

While each generation has improved electronic communication, the underlying reporting processes have remained largely unchanged.

International supply chains have changed dramatically.

The growth of e-commerce, increasing transhipment activity, sophisticated data analytics, artificial intelligence, and international advance cargo reporting requirements mean that Australia's regulatory framework should now move beyond transaction-based reporting towards a more flexible, intelligence-driven and risk-based model.

FTA supports reform that:

- strengthens Australia's border security;
- enhances biosecurity outcomes;
- protects government revenue;
- reduces unnecessary regulatory burden;
- improves data quality rather than simply increasing data quantity;
- leverages trusted trader programmes;
- encourages innovation by commercial software providers; and
- improves Australia's international competitiveness.

Government should resist simply layering additional reporting obligations onto existing processes. Instead, this review provides an opportunity to redesign Australia's cargo reporting framework around modern supply chains.

Key Principles

FTA and APSA believe any future cargo reporting framework should be guided by six principles.

1. Earlier information rather than more information

The objective should be to provide regulators with earlier access to quality information, not simply require additional reporting. The quality and timeliness of information is significantly more important than increasing reporting volumes.

2. Report once — use many times

Information should only need to be reported once. Future systems should enable information supplied by one party to be reused throughout the supply chain, reducing duplication while improving consistency.

3. Risk-based regulation

Not every transaction presents the same level of risk. Government resources should increasingly focus upon higher-risk entities while compliant businesses receive simplified reporting obligations.

4. Trusted Trader should become central to future reforms

The Australian Trusted Trader programme already provides the framework necessary to differentiate regulatory treatment. Rather than creating new accreditation programmes, Government should significantly expand the practical benefits available through ATT.

5. Government should regulate outcomes—not software design

Australia already has sophisticated commercial software providers servicing customs brokers, freight forwarders, exporters and importers.

Government should provide:

- modern interfaces;
- clear business rules;
- flexible data exchange standards; and
- consistent validation.

Industry is best placed to innovate.

6. Reform should simplify—not complicate

One consistent lesson from previous cargo reporting reforms is that complexity increases costs without necessarily improving compliance. Future reforms should reduce unnecessary reporting, not create additional layers of administration.

Pre-load Reporting

FTA and APSA see merit in the introduction of pre-load reporting for both sea and air cargo.

Most of Australia's major trading partners have operated advance cargo reporting for many years.

Alignment with international practice would:

- improve consistency for carriers operating internationally;
- enhance border targeting;
- improve biosecurity risk assessment; and
- provide greater certainty that cargo has been reported before loading.

However, implementation should minimise duplicate reporting.

Where possible, pre-load reporting should ultimately replace elements of current reporting rather than simply adding another reporting layer.

Minimum Data

FTA supports collecting the minimum amount of information necessary for regulators to undertake effective risk assessment.

Additional data requirements should only be introduced where there is a demonstrated regulatory benefit.

Place of Export versus Place of Loading

FTA recognises advantages in reporting from the place of export because information becomes available earlier.

However, current ICS limitations create significant operational problems.

Today, consignment key data (including vessel, voyage and container details) cannot easily be amended.

Where cargo is transhipped, changes frequently occur after export.

This often requires complete cancellation and re-reporting throughout the reporting cascade.

Future systems should allow amendment of all data fields while maintaining a complete audit history.

This single reform would remove one of the greatest administrative burdens currently experienced by industry.

Progressive Cargo Reporting

FTA and APSA see merit in exploration of progressive reporting whereby shipment information is enriched by the party best placed to provide each data element.

This approach has potential to:

- improve data quality;
- reduce duplication;
- remove unnecessary re-reporting;
- improve regulator visibility earlier in the supply chain.

However, this can only succeed if future systems allow flexible amendment of shipment information.

Current cascade reporting rules requiring exact matching create unnecessary administrative effort.

Release versus Clearance

FTA and APSA see merit in separating cargo release from revenue clearance where appropriate.

This could provide significant productivity improvements for customs brokers while smoothing processing workloads.

However, success depends upon maintaining genuinely simplified release reporting.

If the initial declaration requires most information currently contained in an import declaration, the reform will produce little practical benefit.

FTA also notes that the original ICS design contemplated Request for Cargo Release (RCR) functionality that was never fully implemented.

Government should examine whether existing architecture can be utilised before creating entirely new reporting models.

Revenue Reform

FTA and APSA see merit in modernising revenue assessment and collection.

Recent events have demonstrated risks associated with intermediary payment arrangements.

FTA supports greater use of direct payment by importers.

This better reflects legal responsibility for customs liabilities while reducing financial exposure for customs brokers.

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Securities

Should Government introduce a revenue security framework, FTA and APSA strongly recommend that administration be largely automated.

Future systems should include:

- automatic linkage between securities and declarations;
- automated acquittal once liabilities are paid;
- real-time online balance information;
- revolving securities rather than transaction-specific guarantees;
- risk-based security requirements; and
- reduced requirements for trusted entities.

Customs brokers should not assume importer liabilities.

Trusted Trader

FTA sees merit in the Australian Trusted Trader programme being the foundation of future cargo reporting reforms.

Meaningful benefits could include:

- reduced reporting;
- periodic declarations;
- streamlined release;
- simplified revenue collection;
- reduced security requirements; and
- lower compliance costs.

Importantly, these benefits should extend beyond importers to include compliant customs brokers and freight forwarders.

Low Value Cargo

Australia's low-value cargo environment has changed dramatically since current reporting arrangements were developed.

The existing model is increasingly unsustainable.

Concern exists regarding escalating Department of Agriculture, Fisheries & Forestry (DAFF) cost recovery charges applying to cargo reporters.

FTA has previously proposed a trial of alternative reporting mechanisms involving reporting tariff classifications at consignment level using existing ICS capability.

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This approach would:

- improve regulator targeting;
- utilise existing community protection profiles;
- avoid ICT redevelopment;
- reduce operational costs.

Before reconsidering the current $1,000 di minimis threshold, Government should first examine opportunities to improve reporting quality.

As the distinction between postal and commercial cargo continues to diminish, particularly through the growth of e-commerce, it is increasingly important that Government adopt a consistent regulatory framework across both pathways. Any future reporting, revenue collection and compliance arrangements should apply equally to cargo and postal streams to ensure competitive neutrality and maximise border protection outcomes

Artificial Intelligence

Artificial intelligence will increasingly support customs compliance.

AI has potential to assist with:

- tariff classification;
- document validation;
- anomaly detection; and
- low-value cargo processing.

However, AI should support, not replace qualified customs professionals.

Appropriate governance, audit capability and human oversight will remain essential, particularly where revenue liabilities or regulatory obligations are involved.

System Design

FTA encourages Government to avoid over-engineering future cargo reporting systems.

Australia benefits from a mature market of commercial software providers that already integrate customs, freight, logistics and commercial systems.

Government should focus on providing:

- stable APIs;
- flexible messaging standards;
- consistent validation rules;
- transparent business requirements.

Innovation should remain with industry.

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Conclusion

FTA and APSA supports comprehensive reform of Australia's cargo reporting framework.

This review should be viewed not as an opportunity to make incremental improvements to the ICS, but to establish a modern regulatory framework capable of supporting Australia's international trade for decades to come.

Future reforms should:

- provide earlier, better quality information;
- reduce duplication;
- simplify reporting;
- strengthen border security;
- improve biosecurity;
- modernise revenue collection;
- leverage trusted trader programmes;
- encourage software innovation; and
- reduce regulatory costs.

FTA and APSA look forward to working closely with ABF, DAFF and industry throughout the next phase of consultation to ensure the development of a practical, efficient and internationally aligned cargo reporting framework.

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