

3 July 2026



Submission to the Australian Border Force Cargo Reporting System Transformation Discussion Paper

Freight & Trade Alliance (FTA) and the Australian Peak Shippers Association (APSA) welcome the Australian Border Force's review of Australia's cargo reporting systems, capability exploration and market options.

As outlined in the FTA/APSA submission to the Australian Border Force on the *Future Cargo Reporting Discussion Paper*, lodged on 29 June 2026, reform should be viewed not as an opportunity to make incremental improvements to the Integrated Cargo System (ICS), but as a once-in-a-generation opportunity to establish a modern regulatory framework capable of supporting Australia's international trade for decades to come.

The submission highlights that Australia already has a mature and sophisticated ecosystem of commercial software providers supporting customs brokers, freight forwarders, exporters and importers. Rather than developing competing industry-facing applications, the Government should focus on providing the core regulatory infrastructure through:

- modern digital interfaces;
- clear and consistent business rules;
- flexible data exchange standards; and
- robust, consistent validation services.

This approach would allow industry software providers to continue driving innovation and delivering value-added services, while enabling government to focus on its core regulatory responsibilities. The result would be a more efficient, adaptable and future-ready cargo reporting environment for both industry and regulators.

A fundamental element of that reform must be the replacement of the current digital certificate framework used to access the ICS.

This is not a new issue.

FTA/APSA has consistently called for the mandatory Gatekeeper digital certificate model to be replaced with contemporary authentication and identity management arrangements aligned with those already adopted across other Commonwealth agencies.

The existing Gatekeeper certificate framework was introduced more than two decades ago as part of the original ICS implementation. While appropriate at the time, it is now outdated technology that imposes unnecessary cost and administrative burden on industry.

Businesses wishing to interface with the ICS are required to obtain Gatekeeper Device Certificates for servers, together with Standard or Manager Gatekeeper Certificates for individual users. The current model is supported by a single certificate provider, creating a monopoly supply arrangement and exposing industry to significant purchase and renewal costs.



In its [submission](#) to the Simplified Trade System (STS) on 27 July 2023, FTA/APSA made the following commentary and recommendation.

3.2. ENTITY MANAGEMENT AND DIGITAL IDENTITY

Q20. Do you or your business currently use services like myGovID for digital identification?

Digital Certificates

FTA/APSA see a need to move away from Digital Certificates mandated for the use of the Australian Border Force (ABF) Integrated Cargo System (ICS) to standardise identification and the digital agreement of terms and conditions in line with other government departments.

To interface with the ICS, users must have digital certificates for servers (Gatekeeper Device Certificate) and individuals (Standard / Manager Gatekeeper Certificates). This appears to be dated (and expensive) technology, first introduced in 2004 as a part of the exports phase of the ICS implementation and the then new use Internet protocols.

As it stands today, there is a monopoly supplier of digital certificates and a high cost of purchase / renewals.

By way of example of the rapid increase in pricing, Gatekeeper Manager Certificates with a 2 year validity has seen the following increases:

2015 \$126.50

2017 \$209.00

2019 \$299.00

2022 \$360.00

The most recent increase (announced in December 2021) is outlined in the below table:

Certificate Type	Previous Price	New Price
Gatekeeper Manager Certificate – 2 year validity	\$299.00	\$360.00
Standard Gatekeeper Certificate – 2 year validity	\$275.00	\$330.00
Gatekeeper Device Certificate – 2 year validity	\$800.00	\$960.00

These Digital Certificates are being used for communications to the ICS only and no other Federal Government application used by the international trade sector.

RECOMMENDATION 24 – the Australian Border Force to phase out and replace the use of Digital Certificates with a more contemporary, cost effective and a whole of government approach to data integrity.

FTA/APSA maintains its longstanding recommendation that the Australian Border Force phase out the use of Digital Certificates and replace them with a contemporary, cost-effective authentication framework aligned with a whole-of-government approach to digital identity, security and data integrity.

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