

Dear [REDACTED],

Further to your email dated 12/04/16 I would like to add to my initial submission on Review of Customs Licensing Arrangements in which I limited my submission to deal in particular with the licensing of Customs Brokers (LCB).

In this additional submission it is prudent to highlight the objective of the licensing review must embrace social aspirations that actually benefits Australian society in its totality. It is important that self interest of any of the following Department of Immigration and Border Protection (DIBP), Australian Border Force (ABF), Department of Agriculture and Water Resources, Australian Taxation office and Licensed Customs Brokers should not be an objective of the review.

Moreover, deregulation of the LCB industry would be foolhardy. [REDACTED] who was the Comptroller General of the Australian Customs Service in the 1990's wanted to deregulate the LCB industry in the mid-1990's. However, as a result of the Conroy Report [REDACTED] resigned and some common sense prevailed under [REDACTED] who took a more realistic approach to the issue of licensing Customs Brokers.

Previously in 1995 there was an exchange program organised by [REDACTED] of Customs and the Customs Broker's Council of Australia in which a Customs Officer would spend a week in a Licensed Customs Broker's office and in return a LCB would spend a week in Customs. I was the first LCB to spend a week within Customs which was an extremely worthwhile program to bridge the adversarial approach of each profession towards each other and develop an understanding of each other's problems in pursuit of completing the necessary day to day functions.

I believe it is important to broaden the range of stakeholders in the review to include the Australian working community; Australian industry embracing retailers, wholesalers and manufacturers; Australian consumers; Australian Government Agencies; Australian Importers; Australian Exporters and the LCB community. All of these stakeholders must be considered in their entirety and totality to ensure that a revised licensing system for customs brokers – whatever its guise- is beneficial for ALL Australians.

There are competing adversarial opposites within the key stakeholders of the licensing review such as DIBP/ABF versus LCB where it seems the Government Agencies objective is to exclude LCB from the Trusted Trader Program; the Consumer's purchasing power versus Industry's merchandising power and Worker's labour versus Industry employment practices and conditions.

LICENSING REGIME FOR CUSTOMS BROKERS SHOULD INCLUDE:-

- There needs to be closer interaction between the Customs Broking industry (mentoring at the coalface) and the educational institutions (providing useful up to date practical customs broking tuition) that develops prospective licensed Customs Brokers.

- Ideally a co-ordinated formal mentoring program within customs brokerages in conjunction with provision of practical evidence via the individual prospective customs broker's folios to the educational institutions will achieve a more rounded licensed customs broker.
- With corporate customs brokerages demanding licensed brokers who possess generic skills to meet both national goals and the global knowledge economy there must be an improved capacity for licensed brokers to develop independent critical thinking.
- Whilst some generic skills are better suited contextually to some brokerages than others many employers want culturally, mentally tuned employees who have generic skill capabilities to fit into their brokerage workplace.
- The revolution of the knowledge and information age has created human capital which is the future skills development, wealth creation and information empowerment to promote economic productivity within the customs broking industry.
- Thus human capital is transformed into an asset in which both licensed individuals and corporations have invested time and money; that can be depreciated in addition to being increasingly mobile. It is this mobility that concerns corporate customs brokerage owners.
- Many brokerages are capitalising on the development of human capital focusing upon communication and innovation to create businesses for the twenty first century that meets the demands of the importing and exporting communities within an increasing DIBP/ABF and DA<sub>g</sub>WR compliance regimes.

There will be significant benefits to the following supply chain players:

- DIBP/ABF/DA<sub>g</sub>WR through greater workplace compliance to Customs and Customs related laws;
- Importing communities with greater satisfaction of professional expert advice;
- Employers with participatory skills development and learning culture will enjoy increased productivity;
- Individual licensed customs brokers will enjoy a more holistic approach to work, along with increased skills and expertise.

Any licensing system of customs brokers that does not look after ALL of these stakeholders to a significant degree will NOT be a licensing system worth having if it does not serve/service ALL Australians.

Based on these indisputable abovementioned factual arguments it is absolutely imperative to maintain a licensing system of Customs Brokers not only from a compliance perspective but also for the preservation of the various Australian communities and ALL stakeholders.

Kind regards,

