

Assistant Director Ports Policy
Traveller Branch
Traveller, Customs and Industry, Policy Division
Policy Group
Department of Immigration & Border Protection

22 December 2015

Dear Madam,

Customs Licensing Review

Founded in the year 2000, myfreightcareer is a market leading, innovative Registered Training Organisation providing training and traineeships to the International Freight Forwarding, Customs Broking and Logistics communities. We employ trainees and place them with host employers within those industries and have developed a highly structured and intensive delivery model for our trainees. As a result, myfreightcareer has been able to sustain a traineeship completion rate of over 75% with a conversion to successful employment rate at over 98%, delivering over 2,000 trained professionals to industry.

myfreightcareer commenced delivery of the Customs Brokers Course, the course of study approved by the then Australian Customs Service for Customs Broker Licensing purposes in 2010, transitioning to the Diploma of Customs Broking in July 2014, when the Australian Customs and Border Protection Service nominated that course as the "Approved Course of Study" for Customs Broker Licensing purposes.

The myfreightcareer Customs Broking Division currently offers the following suite of products:

- Diploma of Customs Broking
- myfreightcareer National Examination – Customs Broking Experience Assessment
- Customs Brokers Continuing Professional Development Program
- Biosecurity Training - NCCC & AEPCOMM Schemes
- Compiler/Classifier Skill Set

In **June 2005** myfreightcareer made representations to the Australian Customs Service suggesting improvements to the Customs Broker Licensing process and has continued to agitate for change since that time.

NCBLAC

It has been myfreightcareer's contention for some years that the current Customs Broker's Licensing process is flawed. In particular our view is that the membership of NCBLAC has not been representative of the breadth of the industry impacted by the functions performed by Customs Brokers. The fact that the Australian Border Force has continued to select the industry representative from the same industry body, when that body is in competition with other industry bodies and organisations providing services to the industry is questionable. Despite claims to the contrary the favoured industry body is not the only industry body representing Customs Brokerages and Customs Brokers. Review of ABF reference 2012/018552 and NCBLAC reference 2012/044827 will provide further information.

myfreightcareer Pty limited abn 49 094 576 039

SYDNEY
MELBOURNE
BRISBANE
PERTH
INTERNET

PO Box 6368 Alexandria NSW 2015 telephone (02) 9313 9777 facsimile (02) 9313 9711
Unit 10B, 80-82 Keilor Rd, Essendon North VIC 3041 telephone (03) 9379 3755 facsimile (03) 9379 3766
3/318 Junction Rd, Clayfield QLD 4011, telephone (07)3357 5503
197 Campbell Street Belmont WA 6104 telephone (08) 9477 4633 facsimile (08) 9277 6975
www.myfreightcareer.com.au EMAIL mail@myfreightcareer.com.au Toll Free 1300 881 075

It is worthy of note that one of the key considerations and conclusions identified by **Charles Sturt University's Centre for Customs and Excise Studies** in their **2014 "Review of Licensing Provisions"** stated:

9.2. Constitution of NCBLAC

It is widely recognised by both government and industry that customs brokers are engaged by traders to ensure that goods meet both Customs and Quarantine requirements. Given the changing government priorities and the fact that the work of customs brokers touches upon a wide range of Commonwealth public policy issues (indeed not restricted to customs and quarantine), it is considered that those wider interests of the Commonwealth should also be represented in assessing a person's suitability to be a customs broker, whether as a member of NCBLAC or otherwise.

It is hoped the outcomes of the DIBP review will result in a more representative licensing advisory body that delivers more than a mere shuffling of the current NCBLAC deckchairs.

Customs Broker Licensing

myfreightcareer believes the adoption of a Registered Customs Broker scheme based on the Australian Registered Tax Agents model as described in **Recommendation 10 3(A)** of **Charles Sturt University's Centre for Customs and Excise Studies 2014 "Review of Licensing Provisions"** delivers the optimal solution to the much needed reform of Customs Broker Licensing in Australia. That recommendation offers the following solution:

3. Abolish the current customs broker licensing arrangements and:

3(A) Replace them with a scheme based on the Registered Tax Agents model as described in Option 4, that will include:

a. Establishment of a RCB scheme

b. The RCB scheme to be administered by an independent body ('the Administrator') that is comprised of a representative of ACBPS, a representative of DAgs, a number of customs broker representatives and an independent chair

c. Registration as a customs broker be based on:

i. achievement of a professional qualification

ii. a minimum period (say one year) performing the functions of a customs broker under the supervision of an RCB

iii. being deemed to be a 'fit and proper person'

iv. meeting the requirements of a Code of Professional Conduct (including CPD); and

d. CPD criteria to be determined by the Administrator, with all CPD operational arrangements managed by industry

We trust the licensing review will deliver a more equitable and professional solution to the licensing of Customs Brokers in Australia.

Kind regards



myfreightcareer Pty limited abn 49 094 576 039

SYDNEY
MELBOURNE
BRISBANE
PERTH
INTERNET

PO Box 6368 Alexandria NSW 2015 telephone (02) 9313 9777 facsimile (02) 9313 9711
Unit 10B, 80-82 Keilor Rd, Essendon North VIC 3041 telephone (03) 9379 3755 facsimile (03) 9379 3766
3/318 Junction Rd, Clayfield QLD 4011, telephone (07)3357 5503
197 Campbell Street Belmont WA 6104 telephone (08) 9477 4633 facsimile (08) 9277 6975
www.myfreightcareer.com.au EMAIL mail@myfreightcareer.com.au Toll Free 1300 881 075