

Submission to : Review of Customs Licensing Regimes :

This submission relates to the licensing of Customs Brokers :

With Department of Immigration and Border Protection increased priority on border security and control, good regulatory control of the commercial import and export is more important to ensure correct compliance with the current laws and regulations.

The current systems seem to work well and the introduction of Continual Professional Development for licenced brokers was necessary.

Administration:

I have not used the current application process, but believe going to an online process for applications and renewals would be more efficient and reduce the work load and cost.

The information required in the application process would have to be sufficient to allow the application to be process.

The fee structure would have to be a matter of consultation with industry.

NCBLAC:

There has to be a regulatory body to oversee the licensing of companies and individuals and I believe NCBLAC provides that.

The present make up of the committee is appropriate.

I also believe that the two tiered licensing system of a Corporate licence and individual licencing should be retained.

Securities:

I do not believe securities should be a requirement for a customs brokers licence as there are sufficient powers in the Customs Act and Regulations to ensure compliance with these.

Duration of a licence:

All licences should have the same duration preferably 3 years. This would reduce the administration burden and cost.

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Fit and Proper Person:

I believe the current requirements are appropriate and combining the requirements of the DIBP and the DAWR would be a good idea. Or at least the DAWR accept that a licenced broker is a fit and proper person and meets their requirements.

Comments:

Reading the Review of Licensing Provisions by Charles Sturt University, most countries have some government control over customs brokers.

If we go to self regulation a governing body would need to be established with proper policies, regulations and controls in place to maintain the required standards.

It would seem the current system is working well but can always be improved.

History:

[Redacted]

Thank you for the opportunity to lodge a submission.

[Redacted]

31/12/2015