Our reference ECS/JC/BATA22169-9120903

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13 June 2017

By email Hannah Ransom Senior Project Officer, Adjudication ACCC Contact James Cameron (07) 3228 9752 Email: james.cameron@corrs.com.au

> Partner Eddie Scuderi

David Hatfield Director, Adjudication ACCC

Dear Hannah and David

Application for authorisation - A91550

This submission is made on behalf of the Applicants in response to late submissions made by the Western Australia Department of Health dated 2 June 2017, the Commonwealth Department of Health dated 6 June 2017 and the Cancer Council Victoria dated 7 June 2017 (**Interested Parties**). This letter is for the public record.

Response

The arguments of the Interested Parties on Article 5.3 are fundamentally flawed because they confuse health policy with established intelligence sharing.¹

Indeed, the Commonwealth Department of Health (Department) **expressly acknowledges that government agencies accept intelligence information from the tobacco industry** and states that this *"is of a different character than that proposed in the Application"*. The provision of intelligence offered in the application is **not materially different to existing intelligence arrangements** and the Department has not explained the basis for its opinion as to how such conduct would be different.

A finding by the Commission that the proposed conduct would contravene Article 5.3 would not only undermine and call into question important and established intelligence relationships,² it would signal to organised crime that Australia's competition laws are there to protect them from attempts at cooperative industry-lead efforts against illicit tobacco.

The Interested Parties oppose tobacco of any kind. Yet their arguments (if they were to influence a final determination against the Applicants) would, quite perversely, result in the criminal business of organised crime being placed ahead of the lawful business, products

See arguments on Article 5.3 in submissions lodged on behalf of the Applicants on 23 November 2016 and 15 March 2017.

² See for example the "Industry Engagement Strategy 2020 (Trade, Customs and Traveller)" of the Department of Immigration and Border Protection (attached to this letter).



and private contractual rights of the Applicants and the genuine and transparent efforts of the Applicants to combat the trade in illicit tobacco.

The Department argues that the goal of the tobacco industry (in combating illicit tobacco) is to increase sales of its products. Yet the Department fails to acknowledge that law enforcement efforts against illicit tobacco (assuming, hypothetically, that they were as effective as the proposed conduct) **would have precisely the same effect** - increased sale of the Applicants' licit products.

Australian **licit** tobacco laws are arguably the toughest in the world. If the outcome of the proposed conduct is that the Applicants' lawful products are consumed in place of illicit tobacco, **effect is given to those laws** and a serious market failure is addressed.

In reference to the arguments under the heading "Identifying illicit tobacco" of the Department's submission, these arguments are no longer relevant. The Applicants' proposal to only allow evidence of the supply or attempted supply of 'Non Plain-Pack Tobacco'³ to trigger the proposed boycott conduct, means that they will not be able to use purely 'technical' breaches of the plain packaging legislation. In any event, a clear and independent appeals process will apply.

Both the Cancer Council Victoria and Commonwealth Department of Health expressed concerns that the proposed conduct may impact on retailers.⁴ If those concerns had any legitimacy to them, they would also have been expressed by retailers and their associations. It is quite the opposite. A wide range of retailers and retailer associations have, through both written submissions and at the pre-decision conference, strongly supported or not opposed the proposed conduct.⁵

Conclusion

The Commission has already formed the view that a substantial market in illicit tobacco exists.⁶ And trade in illicit tobacco is growing.⁷ Illicit tobacco impacts on the lawful business of the Applicants and the livelihoods of thousands of licit tobacco retailers across the country.

Intense competition between the Applicants has prevented unilateral conduct by each of them being effective against retailers that choose to supply illicit tobacco, indeed that competition has facilitated the ability of illicit tobacco retailers to continue to trade under the cover of licit tobacco products. Authorisation of the proposed conduct would solve this problem in a transparent, measured and appropriate manner. The proposed conduct would

³ Applicants' submission (15 March 2017), pp8-9.

⁴ Submission by Commonwealth Department of Health (6 June 2017), p 6; Submission by Cancer Council Victoria (7 June 2017) pp 1-2.

⁵ Australasian Association of Convenience Stores, Submission (12 September 2016); Australian Retailers Association, Submission (21 September 2016); 7-Eleven Stores Pty Ltd, Submission (21 September 2016); Ritchie's Stores Pty Ltd, Submission (19 September 2016); MGA Independent Retailers, Submission (19 September 2016) and (19 January 2017); TSG Franchise Management Pty Ltd, Submission (16 September 2016); Drakes Supermarkets, Submission (5 September 2016); TSG Spencer Street, Submission (12 September 2016); Cignall Pty Ltd, Submission (20 September 2016) and (19 January 2017); Pre-decision Conference minutes (12 February 2017).

⁶ ACCC, draft determination, paragraph 56.

⁷ News.com.au, Illegal tobacco industry flourishing in Australia as government hikes taxes (6 May 2016) < <u>http://www.news.com.au/finance/economy/australian-economy/illegal-tobacco-industry-flourishing-in-australia-as-government-hikes-taxes/news-story/c1d28c0a1919d0fbcc499579a2386b28</u> >.



be performed by the Applicants in their private capacity and in exercise of their private contractual rights.

As a matter of principle and common sense, and in the face of strong support from retailer associations and the informed views of the Chair of the Parliamentary Joint Committee on Law Enforcement (Inquiry into Illicit Tobacco),⁸ the proposed conduct is highly likely to be effective in reducing the trade in illicit tobacco at the retail level of the supply chain, complementing existing tobacco control measures without disrupting law enforcement activities.

The Commission should not favour an outcome that would serve to protect or encourage the trade in illicit tobacco and further undermine existing tobacco control measures.

Thank you for the opportunity for the Applicants to provide this submission. If you have any questions about this submission, please contact us to discuss.

Yours faithfully Corrs Chambers Westgarth

Eddie Scuderi Partner

Attachments

Department of Immigration and Border Protection, Industry Engagement Strategy 2020 (Trade, Customs and Traveller).

⁸ Applicants' submission (15 March 2017), para [8.5]-[8.7].



Australian Government Department of Immigration and Border Protection

Industry Engagement Strategy 2020

Trade, Customs and Traveller

Industry Engagement Strategy 2020

Trade, Customs and Traveller

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Message from the Secretary and Commissioner

The Australian border is a strategic national asset, holding economic, national security and social value.

Forecasts indicate that over the next four years there will be significant growth in cargo and passenger movements to and from Australia. This trend will be magnified by progress and developments in global trade, such as Free Trade Agreements. Legitimate trade and travel through interconnected supply chains and traveller flows needs to be insulated against the very real threats posed by groups who have the resources, capability and motivation to exploit them. These can include issue motivated groups, terrorists and organised crime syndicates.

The mission of the Department of Immigration and Border Protection (the Department) is to protect Australia's border and manage the movement of people and goods across it, and our vision is to be Australia's trusted global gateway. To achieve this, and to adapt to the challenges of the future border environment, requires a paradigm shift in the way in which the Department operates and engages with industry.

Effective partnership with industry is critical to achieving our mission and vision. At all levels and in all areas across the Department, our relationships with industry are critical to achieving our mission and vision and we acknowledge and value the essential support and partnership industry provides to the Department.

We recognise that industry shares the Australian Government's objectives to build a prosperous economy and keep the Australian community safe, and can contribute many ideas, strategies and innovations to achieve this. Our approach to industry engagement is to communicate effectively, to be responsive and accountable as an organisation and to work in partnership to automate, deregulate and streamline border management processes.



This *Industry Engagement Strategy 2020 (Trade, Customs and Traveller)* (the Strategy) is intended to engage our industry stakeholders involved in the movement of people and goods across Australia's border. This Strategy is to be read in conjunction with the *Industry Engagement Strategy 2020 (Migration and Mobility)*. Taken together, these strategies articulate our shared objectives across the diverse environments in which the Department and industry operate.

We call upon our industry stakeholders to help us implement valuable and lasting improvements to border management, for the benefit of all traders and travellers, and we reiterate our commitment to work in partnership with industry to realise the full potential of the Australian border and its contribution to Australia's economic growth, security, and social well-being.

Michael Pezzullo Secretary

Roman Quaedvlieg APM Commissioner and Comptroller-General of Customs



Purpose

The *Industry Engagement Strategy 2020 (Trade, Customs and Traveller)* presents the Department's approach to industry engagement on trade, customs and traveller facilitation. It reaffirms our commitment to working with industry in strategic, forward-focused partnership, in alignment with the Department's *Strategy 2020* and the *Corporate Plan 2015-19*.

This Strategy is to be read in conjunction with the *Industry Engagement Strategy 2020* (*Migration and Mobility*). Taken together, these strategies will be used to provide a framework for engagement and consultation between the Department and industry on a broad range of policy, operational and regulatory issues.

In the context of these strategies, "traveller" refers to the management and clearance of people moving across the Australian border, as distinct from the permanent residence and settlement in Australia of new arrivals ("migration") and from the temporary stay in Australia for diverse reasons ("mobility"). The policies and programmes that support these movements are highly complementary and interrelated.



Introduction

The mission of the Department, including its newly formed operational enforcement arm, the Australian Border Force (ABF), is **to protect Australia's border and manage the movement of people and goods across it**. The Department exists in a unique environment with a broad remit to manage the border that touches almost every aspect of Australian life – national security, industry and commerce, community protection, law enforcement, security of Australia's maritime resources and environment, and the collection of revenue. Our vision is **to be Australia's trusted global gateway**. Effective partnership with industry is critical to achieving this mission and vision.

The ABF is a single operational organisation within the Department, established on 1 July 2015, to bring together existing immigration and customs operational border functions. The ABF, in close cooperation with Australian Commonwealth, state, territory and international partners, plays a significant role in the delivery of customs functions and services, while monitoring compliance, conducting enforcement activity, and undertaking investigations as part of the Department. The ABF facilitates legitimate trade and travel by delivering efficient, streamlined cargo and traveller clearance systems, and by working with industry to deliver education, advice and industry support to improve voluntary compliance with customs requirements. The ABF is committed to working with industry across the border continuum to support and build Australia's economy through the optimisation of legitimate trade and travel.

Strategic environment

Australia is operating within an increasingly globalised economy. This impacts the border through growing trade and travel volumes, complex supply chains and travel routes, rapidly increasing e-commerce and a greater geographical dispersion of entry and exit points within Australia. The Department and industry both share a need to take advantage of opportunities for collaboration, co-design and co-investment in technologies to best adapt to the changing global trade and traveller environment. Preparing for expected future increases in border movements and reducing delays in processing these movements has significant positive economic impacts. The Australian Logistics Council estimates savings to the economy of \$1.5 billion for every one per cent increase in efficiency of transport and logistics supply chains. As the gateway to Australia, the Department must work with industry to respond efficiently to environmental challenges and maximise the benefits to the Australian economy.

Growth in cargo and travellers

In the next four years, the volume of people and goods crossing our border is projected to increase significantly. Over the four years from 2014–15 to 2018–19 international air and sea traveller movements are projected to increase by 23 percent.

Of particular note is the strong development predicted in the number of sea passenger arrivals and departures, which is expected to see stronger year-on-year growth than air passenger over the same four year period.

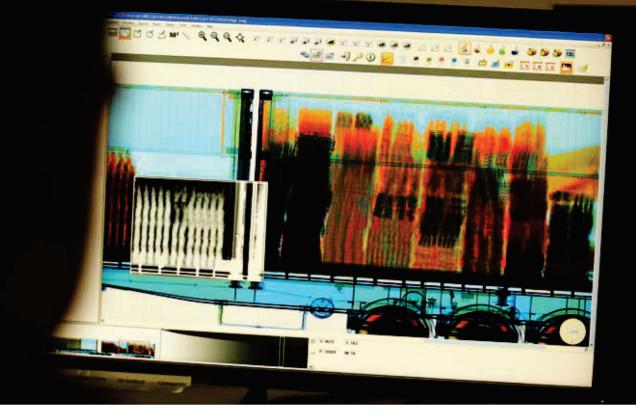
Similarly, inbound cargo facilitated by the Department will continue to grow. Over the four years from 2014–15 to 2018–19, the number of imported sea cargo reports is expected to increase by 14 percent and the number of inbound air cargo consignments to grow by 26 percent.





Australian Trusted Trader programme

An example of a collaborative partnership with industry is the *Australian Trusted Trader* programme. This programme commenced its pilot phase on 1 July 2015, and is a voluntary accreditation scheme which recognises secure supply chain and compliant trade practices, offering tailored trade facilitation benefits to accredited businesses. This initiative was co-designed with industry and is a partnership between government and business underpinned by shared responsibility and trust. Accreditation is available to all Australian businesses regardless of size who are active in the international trade supply chain and meet or exceed the required standards. Businesses that meet or exceed international supply chain and trade compliance standards present less risk at the border. *Australian Trusted Trader* recognises this and offers priority treatment for accredited traders. This will enable Trusted Traders to forge new global trade links more easily, be more competitive and operate with greater certainty.



Our shared objectives with industry

The Department's four strategic objectives, as outlined in *Strategy 2020*, are to protect Australia, promote responsive migration, advance trade and revenue, and lead border innovation. The Department's engagement with industry, and the strategic policy and operational partnerships that flow from this, are essential to achieving these objectives.

The Department shares with industry a responsibility to protect the safety and security of Australia and its people. The Department works in close cooperation with industry to minimise the ability of criminals to take advantage of legitimate trade and travel activities across the border. The Department also shares with industry the common objectives of optimising legitimate trade to support Australia's economy, and ensuring that the collection of border revenue is lawfully and correctly administered.

Innovation at the border is vital in maintaining Australia's global standing as a leader in trade and border management. The Department's objective is to collaborate with industry to develop innovative technology and business processes to deliver a streamlined and simplified border experience which minimises delays for low-risk passengers and goods, provides certainty to industry, and enhances border security measures.



Seamless Traveller initiative

The Seamless Traveller initiative is an example of our innovation in partnership with industry. In the 2015 Budget, the Australian Government committed \$93.7m over five years to support Seamless Traveller which will see the roll out of new technology, including SmartGates, to provide next generation automated biometric processing at major air and sea ports.

This new capability will reduce manual processes allowing a fast, seamless self-processing experience for up to 90 per cent of travellers. In the longer term, the objective is to have a "no-touch" and paperless clearance process which will create a domestic-like experience for international travellers. A variety of new technologies will be leveraged to achieve this objective, including advanced biometrics and face-on-the-move, making the process faster and simpler for travellers.

The roll-out of this initiative is being closely managed in consultation with industry and other stakeholders to ensure a smooth transition and maximise the benefits to air and sea ports.



Our approach to engaging with industry

We will partner with industry to maximise growth and the value of the border to Australia's economy, protect the Australian community and maintain Australia's standing as a world leader in trade and traveller facilitation.

We will work cooperatively with industry to support supply chain security and foster legitimate trade and travel to maximise the value of the border to Australia's economy. Our national security, law enforcement and community protection responsibilities will be carefully balanced against the need to design and manage border flows in a way that promotes economic competitiveness and productivity.

We recognise and value the contribution that industry makes in support of our border protection objectives and will seek opportunities to collaborate and better utilise industry knowledge. We will pursue enhanced customs and border clearance processes for traders and travellers. We recognise the primary importance of information and education in encouraging and supporting voluntary compliance.

We will support improvements to Australia's trade competitiveness, working closely with international counterparts to harmonise international standards and practices, and recognising that these have flow on impacts for industry. We will partner with industry on opportunities for technological innovation, co-design, joint investment and enhanced service delivery.



As a single, integrated border agency, we will provide a simpler interface between government and industry involved in the movement of goods and people across the border.

We will explore opportunities to further develop relationships with industry into productive partnerships through innovative approaches to customs and trade-related services and traveller facilitation, such as through the Australian Trusted Trader programme. We will consult industry appropriately on the impact of new policies and regulation. We will seek opportunities to collaborate with our industry to build systems and processes that are complementary and interoperable.

We will communicate effectively with industry, and have clear points of contact, accountability and service standards.

Consistent with the Government's digital transformation agenda, we will establish and promote digital channels to improve timely access to information and expedite interactions with the Department. Our commitment to credible and consistent engagement with clients and stakeholders will be clearly outlined in a Client Service Charter. We will put in place agreed standards to establish levels of identity assurance when we interact with our clients, stakeholders and partners. We will embrace opportunities for increased efficiencies through technological innovation and automation of routine functions, balanced with our responsibility to prevent compromise to the integrity of the border.

Principles for engagement

The Department's vision for industry engagement is to support the achievement of our mission by engaging with industry with clear strategic direction, effective communication, in partnership and collaboration and with a focus on responsive action.

Clear Strategic Direction	Our engagement with industry will be based on agreed strategic direction, and implemented through forward work plans, reviewed regularly.
Effective Communication	We will be open, pro-active and equitable in our provision of information to industry, and will be receptive to the knowledge and experience of industry. We will use digital channels as our first line of communication, and ensure that avenues for engagement are well-defined, accessible and responded to promptly. We will provide opportunities and forums for meaningful and consistent two-way engagement including through industry consultative committees, issue-specific industry advisory groups and the annual Industry Summit.
Partnership and Collaboration	We will seek to further develop industry relationships into resilient and trusted partnerships, and use these partnerships to resolve complex issues and to achieve substantive improvements to traveller and trade facilitation. We will involve industry in the development and design of policy, processes and systems, and be clear about the scope of consultation and decision making processes. We will look for opportunities for co-investment, where appropriate.
Responsive Action	We will be pro-active in our engagement, responsive to requests and feedback, and focus on actions and results. We are accountable for our commitments, and will do what we say we will do. We will provide feedback following consultation including the impacts of stakeholder engagement on the process and outcomes, where feasible.



Advance Passenger Processing

Under the *Counter-Terrorism Legislation Amendment (Foreign Fighters) Act* 2014, the Advance Passenger Processing programme was expanded to include flights departing from Australia. This legislation came into effect on 1 July 2015. Like inward APP, outward APP (OAPP) reports are required from airlines for all their passengers and crew departing Australia.

In an example of successful stakeholder consultation, from June 2014 to June 2015 Qantas and Air New Zealand provided APP reports to the Department for a number of their flights departing from Brisbane International Airport, to facilitate a trial of automated border clearance technologies (SmartGates). The contribution to OAPP data assisted with developing and refining operational capability and processes.

To assist airlines with meeting their reporting obligations, the Department has conducted a number of industry briefings at Sydney, Melbourne, Perth and Brisbane International Airports and further individual support is provided to airlines.

Trade, customs and traveller industry stakeholders

The Department engages with a broad range of industry stakeholders as well as with community groups, academia, local and state governments, foreign governments and international organisations. This engagement builds strategic and operational partnerships essential to achieving the Department's objectives. Key industry trade, customs and traveller sectors are listed below.

Importers and exporters	Importers (including direct consumers) source products from overseas initiating the import process. Exporters source Australian products and commence the export process to allow for their sale in overseas markets.
Cargo and logistics service providers	This sector provides services to the public and industry relating to the movement of goods and cargo, including freight forwarding, express carriers, logistics, warehousing and consolidation.
Carriers	The Carrier Sector includes the owners and operators responsible for the control of any vessel that transports people and goods from one port to another. This includes passenger and cargo airlines, passenger cruise lines and container and bulk shipping lines.
Customs brokers	Customs brokers arrange border clearance of goods on behalf of importers and exporters, and are responsible for clearing goods through customs and quarantine before they reach the Australian market.
Port infrastructure and traveller related services	This sector includes the owners and operators of infrastructure at Australian air and sea ports, as well as related services, systems and facilities.
Domestic manufacturers and producers	Domestic manufacturers and producers are Australian-based entities and produce goods for the domestic market that may also be subject to exportation.
Duty free operators	Duty free operators store and display imported goods on which customs duty has not been paid, and operate at the retail level, selling goods free of customs duty to relevant international travellers under special conditions.



Cutting the Red Tape: the Australian Government's deregulation agenda

The Australian Government's deregulation agenda aims to reduce unnecessary red tape costs on individuals, business and community organisations. The Government has committed to reducing the burden of unnecessary or inefficient regulation that may damage productivity, deter investment and undermine jobs and growth by \$1 billion a year.

The Department's performance against this agenda will be assessed through annual externally validated self-assessments against the Regulator Performance Framework. Separately, there will be a programme of external reviews of a selected set of regulators every three years. There is also the option for Government to commission annual external reviews of major regulators with the results of any assessment or review being published.

The Department is working with our industry stakeholders to explore ways to reduce regulatory and compliance costs where possible, as well as ensuring our approach to regulation and compliance requirements is considered in this context.

Avenues for communication and partnership

There are a number of avenues for industry stakeholders to engage with the Department, which provide the opportunity for industry to have input and influence into policy, programme development and operational issues.

These avenues include the annual Industry Summit, formal industry consultative committees, industry advisory groups, stakeholder meetings held regularly in each State and Territory and industry-initiated forums.

Key departmental consultative forums on trade, customs and traveller

The Department convenes regular industry consultative forums, which comprise membership from industry peak bodies, major industry stakeholders and other Australian Government agencies.



Industry Summit

An annual event hosted by the Department, bringing together senior industry, Departmental and Australian Government representatives to discuss strategic immigration and border protection issues.

National Committee on Trade Facilitation (NCTF)

A strategic-level whole-of-government forum to oversee the implementation of Australia's obligations under the World Trade Organization's Agreement on Trade Facilitation.

Membership includes representatives of the customs broker, freight forwarder, importer and exporter industries, and business councils.

National Sea Passengers Facilitation Committee (NSPFC)

A strategic-level forum focussing on issues relating to sea travel facilitation and associated infrastructure issues.

Membership includes representatives of the cruise ship, port terminal and tourism industries.

National Passenger Facilitation Committee (NPFC)

A strategic-level forum focussing on issues relating to air travel facilitation and associated infrastructure issues.

Membership includes representatives of the airline, airport and tourism industries.

Industry Advisory Groups (IAGs)

Temporary working groups on particular issues, which provide a means for the Department and industry to work together on policy development, programme design and operational implementation.

Regional Stakeholder Group Meetings

Meetings convened by the Department's senior representatives in each State and Territory on both national and regional issues.

Stakeholder engagement continuum

The Department takes a layered approach to stakeholder engagement across the stakeholder engagement continuum as outlined in the table below. The mode of engagement varies according to the nature of the issues, the breadth of possible impact, the timeframes available and a range of other factors.

	Information	Consultation
Stakeholders	Available to all stakeholders	Available to all or targeted stakeholders
When used	When issues have broad- reaching potential impacts When broad stakeholder views will support good decision making and support business delivery	To receive views and input from stakeholders on policies, programmes or services that directly affect them or in which they have a significant interest Targeted when issues are confined to a well-defined group of stakeholders
Purpose	Engagement is mainly one-way provision of information	Enables stakeholders to provide information and give feedback to inform policy and programme design
Methods	Website portal and other digital channels Surveys Newsletters Road shows Fact sheets Conferences	Public submissions Face to face meetings Surveys Road shows Conferences

	Collaboration	Partnership
	Targeted stakeholders with views and input on specific issues	Targeted stakeholders with specific representative roles, expertise and capacity to influence outcomes
	To work with stakeholders on developing solutions to complex issues When the sensitivity of the issue requires discretion When public consultation could compromise government confidentiality Enables stakeholders to influence and shape policies and programmes that	Where co-design or co-investment partnerships between government and industry will achieve superior outcomes When engagement requires a high level of complexity and/or sensitivity When public consultation could compromise government confidentiality Brings the Department and stakeholders together as partners to deliver specific
affect them	complex projects	
	Targeted requests for confidential input Industry Advisory Groups Face to face meetings	Joint project groups Public/private partnerships Co-investment and co-design initiatives Industry advisory groups Face to face meetings



Accessing information

The Department provides a number of channels for communication with industry including our website, service centre and regular information updates through digital and face-to-face channels.

New industry website portal

A priority for the Department is to develop a dedicated industry website portal with information tailored specifically for industry sectors. This website portal will be co-designed with industry and will be continuously improved with the aim of providing a user-friendly location for up-to-date information. It will enable industry to access and search sector specific information, as well as receive updates on news, legislation or regulation changes. The website portal will link with other relevant government trade and industry information portals. The Department will also collaborate with industry to implement an improved approach to communication through digital channels.



Website

The website is the Department's primary information source for all stakeholders including businesses, individuals and trade professionals. Website information includes cargo support advice, customs notices, tariff concessions gazette and information on the importing and exporting process.

Integrated Cargo System (ICS) Announcements Updates for cargo processes and changes and issues with the ICS. Advice regarding nature and length of system outages.	Australian Customs Cargo Advices (ACCAs) Advice issued on changes to reporting or system procedures affecting ICS users.
Australian Customs Notices (ACNs) Notices about new legislation and policy changes.	Tariff updates Changes to tariffs, duty rates, Free Trade Agreements and other tariff updates.
Client Service Charter The Charter outlines the services provided by the Department, any applicable service standards, and information about providing feedback.	Border Watch Border Watch is the Department's programme that receives information about suspicious activities.



Phone

The Department's service centre is the official point of contact for enquiries. The service centre receives general enquiries concerning trade and travel matters from the public, travellers, traders and other industry sectors.

General Enquiries 131 881 for all enquiries regarding travel and trade, including bringing goods in and out of Australia.	Cargo Support 1300 558 099 for assistance and advice for ICS users.
National Trade Advice Centre 1800 053 016 for enquiries regarding tariff advice or by email to tariffclassification@border.gov.au.	Customs Information and Support Centre 1300 363 263 for assistance with information and services available on the Department's website.
Global Feedback Unit 133 177 for any compliments, complaints or suggestions. Also available via online form.	Entry Operations Centre (EOC) 1300 368 126 for airline and other enquiries. 1300 368 970 for seaport enquiries.

www.border.gov.au