



# Simplified Trade System (STS) Consultation Paper response template

## General

- Tell us about your business, sector, product or service and location/s.

Sydney Fish market sells around \$155m of seafood from around Australia and from overseas, with 2020/2021 sales values shown below:

Source	Value
NSW	67,981,795
Interstate	63,790,946
New Zealand	22,032,394
Other overseas	747,248
Total	154,552,382

- What is your role in the end-to-end trade environment (importer, exporter, customs broker etc)?

Facilitator of wholesale seafood sales based in Sydney.

SFM does not undertake importing, exporting or act as a customs broker.

- What are the major pain points for your business to get your product to, from and across the border?

Availability of flights, cold storage availability with logistics providers, onerous international freight documentation, access to product, government legislation – unaligned customs & quarantine requirements for fresh chilled products.

- Where and how do you believe the cross-border trade system can be simplified?

Simplify International freight documentation via greater use of electronic recording of data, expand the 'Australian Trusted Trader' program (SFM is accredited to this, but it appears not many are) and include Biosecurity in simplification of data transmission.

- What changes in the trade process have you incorporated or seen as result of the COVID-19 pandemic that would be beneficial to continue?

None of any benefit to ourselves, if anything the pandemic limited access to seafood for both domestic and international trade.

- What have you seen in other countries' current trade processes that you think could be implemented in Australia?

Free trade agreements

Consolidation of Australia bound shipments to single Australian consignee

## 1. Reviewing red tape

- Which government processes or regulations could be improved (made simpler, more integrated or less duplicative)?

Border force and Biosecurity, particularly as they apply between NZ and Aus. Both countries catch many similar species of seafood yet food safety standards that are not rigorously monitored or applied to Australia captured species do apply to NZ caught equivalent (e.g. Histamine and mercury)

Processes be given the responsibility of the business to report against - subject to accreditation (similar to Australian Trusted Trader). SFM has traded these species for a number of years and is fully aware of the requirements and can assist with the process.

- Which government requirements take the most time to meet and what impact does that have on your business?

AQIS, namely Imported Foods Inspection Program. The current process slows down our ability to obtain clearances for some products which is particularly an issue for ourselves as we trade in fresh and highly perishable products.

DAWE/COLS to allow advanced screening or shorter screening times for Trans-Tasman origin shipments, e.g. ensuring NZ trade lane is consistently operating at highest possible levels, albeit NZ FISH is already processed via accreditation (AEP) and there are NO delays.

- If available, please provide data on the time taken to complete these processes/regulations, and/or the costs to your business.

Difficult to estimate as it varies considerably, however it does impact on suppliers' willingness to supply SFM due to the regulations

## 2. Digital transformation

- What tools/systems are you using to move goods across (Australia's?) borders? Do you use the systems of brokers or other third-party service providers to facilitate trade activity? If you use brokers or other third-party services, why?

SFM utilises Mainfreight International for its clearances. SFM does not have the volume or level of transactions to justify undertaking these functions itself.

- Which part/s of your trade processes are still using paper and/or scanned documents and attachments to emails?

Many businesses still provide fax shipping documents to Mainfreight International.

- How old is your current technology? What is your future technology roadmap, and what is the timeframe?

Currently sell around 80% via auction using computerised clock sales system (17 years old – however various upgrades have taken place since).

SFM will be undertaking digital trading (expected go live April 2022) to facilitate greater domestic and international trade.

Digital integration and a streamlining of customs documents are critical to facilitate ease international trade and encourage greater supply into Australia.

- What technology changes have you incorporated or seen as a result of the COVID-19 pandemic that you would like to continue?

Focus has been on developing digital trading platform as this is seen as critical for future success of SFM business.

- What changes would you like to see to government systems and what impact could this have on your business?

Better liaison with SFM to allow digital trading

Provide import customers with a portal to track status of international clearances

Abatement in lodgement fees to incentivise early lodgement by brokers/exporters, may encourage smaller Trans-Tasman volume exporters to ship more frequently

Introduction and monitoring KPIs for both brokers and importers, including Continuous Improvement Programs, i.e. ideas for improvement from Importers, including SFM, can be heard and considered more readily and in a timely manner.

- What aspects of a 'tell us once' digital service would have the biggest impact on your business and why?

Consolidated digital international electronic clearances

### 3. Data

- How can the government make information requirements clearer or less duplicative?

Government & business liaise better to understand each other's requirements and how these can be incorporated into their systems.

Renewal of import permit – listed goods and type should be automatically rolled into the new permit without having to complete whole new application. Update paper based application to full on-line renewal system. Further, an electronic system should be introduced to alert import business of changes in import/export legislation and how they impact existing permits.

- How could government better support use of common trade-related data standards within the trade sector?

Standardised fish names, often between countries species names differ leading to deception substitution (common Australian marketing fish names should have precedence over imported species names). Such a move would increase level of confidence in importers and the species they import, i.e. they receive what they expect to receive

- Do you have examples of where your business has experienced increased administrative complexity, cost or delays because government systems do not 'talk' to or share data with each other?

Biosecurity and customs are not tightly integrated, resulting in unnecessary delays in the clearance of some shipments, again a big issue with highly perishable goods.

- What opportunities are there for any of your data holdings to be used in other ways to improve cross-border trade?

SFM would be happy to share data on volume and value by species to the Australian seafood industry if this would assist in demonstrating the importance of international sourced seafood products for the Australian consumer

### 4. Federal, state and territory governments

- What is currently working well in interactions across government jurisdictions that could be expanded or replicated?

The use of House airway bills, as currently utilised by some clearance agencies, e.g. Mainfreight International, to be rolled-out across multiple forwarders/clearance houses.

- Which information required by federal, state or territory government is difficult or costly to obtain?

Timely and up to date volumes of all imported seafood into Australia by jurisdiction

- Which processes or information requests are duplicated by federal, state or territory authorities and how does this impact your business?

Not familiar with any

## 5. Measuring performance

- Where have you seen data used effectively across the trade environment to measure success?

Not seen any

- What data sources does your business use to measure and track its performance?

PowerBI, KPI's, customer service team measurement

- Can you provide examples of metrics measuring cross-border trade?

Delivery times

## 6. Innovation in the future trade system

- What innovations does your business use, or plan to use, to improve the way you trade?

Digital Trading

- What innovations have you used or seen elsewhere – including those introduced in response to the COVID-19 pandemic - that would be valuable to continue?

Digital Trading

- What barriers prevent you from incorporating innovation or emerging technology?

Various legislations, co-ordination of logistics, access to 3<sup>rd</sup> party providers (including Government), Government related clearance costs