

22 February 2019

# Review of biosecurity measures to manage the risk of brown marmorated stink bugs (BMSB) entering Australia.

Submission to the Inspector-General of Biosecurity on behalf of Freight & Trade Alliance (FTA) and the Australian Peak Shippers Association (APSA)



“KEEPING AUSTRALIA’S INTERNATIONAL TRADE MOVING”



Australian Peak Shippers Association Inc. (APSA)

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## 1. About Freight & Trade Alliance (FTA)

Freight & Trade Alliance (FTA) is a peak body for the international trade sector with a vision to establish a global benchmark of efficiency in Australian border related security, compliance and logistics activities. FTA represents more than 350 businesses including Australia's largest logistics service providers and importers by volume and participates in key Government forums including the National Committee for Trade Facilitation (NCTF) and the Department of Agriculture Cargo Consultative Committee (DCCC).

FTA has a close working relationship with the Department of Agriculture and Water Resources ('the department') and is one of only two organisations accredited by the department to deliver Continued Biosecurity Competency (CBC) training.

On 1 January 2017, FTA was appointed the Secretariat role for the Australian Peak Shippers Association (APSA), as well as providing advocacy support on trade policy and logistics matters to the Australian Meat Industry Council (AMIC), the Australian Horticultural Exporters and Importers Association (AHEIA), the Australian Cotton Shippers Association (ACSA), the Australian Council for Wool Exporters and Processors and the Australian International Movers Association (AIMA).

## 2. Executive Summary

The department's response to the Brown Marmorated Stink Bug (BMSB) 2018-2019 season has exposed significant deficiencies in current processes, IT systems, staffing levels and industry engagement practices, creating the most significant adverse operational impact on industry since the flawed Customs' implementation of the Integrated Cargo System (ICS) in October 2005.

Since the implementation of the BMSB emergency measures, FTA members have witnessed a deterioration of service levels across the department, particularly in Melbourne and Sydney, Australia's busiest ports, with key import services such as bookings and inspections being most affected.

Based on member feedback, the FTA submission seeks to identify those deficiencies and provide a clear list of recommendations for consideration by the Inspector-General of Biosecurity (IGB).

While many of the recommendations relate to the department's staffing levels, other recommendations seek to optimise and expand on existing initiatives, such as the Approved Arrangement scheme, the 19.2. Automatic Entry Processing for Commodities (AEPCOMM), Cargo Online Lodgement System (COLS) and the Highly Compliant Importer Project (HCIP). Strong, fair and consistent compliance is essential to underpin these systems and arrangements to allow industry an increased responsibility to manage biosecurity risks and to facilitate international trade. Increased responsibility should be given to those that have a strong compliance record.

Other recommendations, such as those that relate to the department's industry engagement strategy, must be addressed with urgency. Communications should already be underway for the upcoming 2019-2020 season addressing fundamental detail as to whether more target BMSB countries and will be added and any additional treatments. Last season, industry did not receive confirmation of the target goods or countries until many consignments had already departed from origin. This cannot be repeated.

With trade volumes projected to grow and an anticipated escalation of the emergency measures in the 2019-2020 BMSB season, the current policy and operational approaches are not sustainable.

FTA thanks the IGB for initial engagement in terms of the Independent Review and the opportunity to provide this submission. FTA looks forward to the findings from the IGB and supporting the department, our extended membership of importers and trade logistics providers and fellow industry representatives to work through the myriad of complex issues affecting current operations and to best prepare for BMSB seasons ahead.



### 3. Summary of strategic recommendations

Please see below a summary of FTA's strategic recommendations for consideration by the IGB. These recommendations are based on FTA's observations of the 2018-2019 BMSB seasonal measures and include a proposed way forward for industry and government.

#### Strategic Recommendation 1:

The department establish a dynamic working group to oversee reforms, including plant policy personnel, compliance representatives and industry representatives. This could potentially be a similar short-term working group co-chaired between government and industry, structured in a similar manner to the ICS Industry Action Group commissioned by the then Customs Minister in November 2005.

#### Strategic Recommendation 2:

Government to allocate short-term funds to selected industry bodies represented on DCCC including FTA, the Australian Federation of International Forwarders, the Customs Brokers and Forwarders Council of Australia and Shipping Australia Limited. This would facilitate the necessary reform co-design and the development of user requirements in an appropriately resourced and co-ordinated manner.

#### Strategic Recommendation 3:

Australian and New Zealand governments closer align BMSB measures for 2019-2020 season.

#### Strategic Recommendation 4:

Staffing level caps imposed on the department to be lifted to ensure adequate resources are available to support key import services. Service levels must be restored to ensure that the department can fulfil its role as a trade facilitator while responding to serious biosecurity risks.

#### Strategic Recommendation 5:

The department to expand and optimise existing programs including AEPCOMM, COLS, Biosecurity 2025 and the Approved Arrangements scheme, to more effectively distribute risk across industry and Government.

### 4. Summary of operational recommendations

Please see below a summary of FTA's operational recommendations for consideration by the IGB. These recommendations are based on input provided from FTA members who were affected by the 2018-2019 BMSB seasonal measures. These recommendations are elaborated on in section 5 of the submission.

#### Recommendation 1:

The department to immediately increase investment in training and compliance processes relating to the Offshore BMSB Treatment Provider Scheme, to ensure that more of the biosecurity risk can reliably be mitigated offshore.

#### Recommendation 2:

The department to expand the Highly Compliant Importer Program (HCIP) to facilitate proven compliant traders. An expanded HCIP program should seek to streamline procedures and allow more resources to be dedicated to genuine high-risk shipments.

#### Recommendation 3:

The department to undertake industry consultation with the view to expand the take-up and implementation of the Safeguarding Arrangements for Brown Marmorated Stink Bug Industry Guide.

#### Recommendation 4:

The department's staffing level caps need to be lifted to ensure that acceptable service levels can be restored and to enable the department to keep up with increasing volumes and complexity of trade.

#### Recommendation 5:

The department's entomologists extend their hours to reflect the needs of industry and / or the department allow industry to engage private entomologists to make these decisions out of hours.

#### Recommendation 6:

The department to consider inspections to be conducted by industry via Approved Arrangements.

#### Recommendation 7:

Depots should be able to be request verification inspections, irrespective of the status of the fumigation, given the anticipated completion date.

**Recommendation 8:**

Onshore treatment timelines to be extended to reflect the shortage of onshore treatment providers, particularly in Sydney and Melbourne.

**Recommendation 9:**

The Government to undertake detailed industry engagement on COLS user requirements and allocate appropriate investment for any necessary upgrades.

**Recommendation 10:**

The department to consider better utilisation of inspection officers in the field, with an ability to combine inspections at facilities irrespective of importer, freight forwarder, goods and the day of scheduled inspection of each shipment.

**Recommendation 11:**

The Government to undertake detailed industry engagement to review the booking system and allocates appropriate investment for any necessary upgrades.

**Recommendation 12:**

The department to consider incentives for the early lodgement of Full Import Declarations (FIDs) to encourage advanced reporting.

**Recommendation 13:**

The department to introduce a dedicated BMSB hotline as an escalation point for urgent BMSB enquiries that meet agreed criteria

**Recommendation 14:**

The department to implement systems upgrades to allow importers and customs brokers to more easily and efficiently change directions and / or treatment providers and treatment locations.

**Recommendation 15:**

The Department of Home Affairs to make the required changes in the ICS to better reflect the nature of holds that are in place.

**Recommendation 16:**

The department should support the research and development of additional treatment options that deliver the necessary biosecurity outcomes.

**Recommendation 17:**

The department engage with industry, state-based regulators and stevedores, to allow extended storage arrangements in prescribed circumstances relating to BMSB holds.

**Recommendation 18:**

The department urgently conduct industry consultation regarding the proposed BMSB 2019-2020 seasonal measures.

**Recommendation 19:**

Following the BMSB 2019-2020 seasonal measures consultation, the department urgently advise industry of the final detail to allow onshore treatment providers to scale operations to meet demand.

**Recommendation 20:**

The department commits to industry consultation for changes to BMSB policy, particularly when those changes occur mid-season.

**Recommendation 21:**

The department to provide industry and the department's operational arm with reasonable lead time before policy changes take effect.

**Recommendation 22:**

The department to regularly provide industry with an overview of the detections that have occurred and other basic information that relates to Australia's BMSB risk.

**Recommendation 23:**

The Biosecurity Act is amended so that importer or customs broker volunteered shipments in excess of AUD\$1,000,000 be processed without requiring the intervention of the delegate.



## 5. Operational recommendations in scope of the review

### 5.1 developing and verifying effectiveness of offshore BMSB management measures

#### 5.1.1 Italian Treatment Providers

The suspension of three prominent Italian BMSB treatment providers, mid-season, created significant disruption to Australian importers and raised serious questions regarding the rigour of the department's Offshore BMSB Treatment Provider Scheme. These questions included whether the department's offshore accreditation process was rigorous enough and whether offshore treatment processes can be considered reliable. Eventually, the treatment providers were re-instated after a meeting between the department and the Italian Fumigation Association. However, since that time, industry has learned that another Italian fumigation provider - Triveneta Disinfestazioni S.r.l - has been suspended following what we understand was the detection of live BMSB in a treated consignment.

FTA members are now asking how can the department possibly look to expand mandatory offshore treatment for Freight of all Kind (FAK) containers, having witnessed the mid-season suspensions and disruption to trade that has ensued with the Offshore BMSB Treatment Provider Scheme?

In the case of Triveneta Disinfestazioni S.r.l, all goods needed to be re-treated or exported on arrival in Australia, with no allowance made for goods in transit.

In addition to compliance implications, FTA has concerns regarding the capacity of existing offshore BMSB treatment providers if mandatory offshore treatment is extended to FAK containers.

In some cases, for offshore treated goods, the department required follow-up seals intact inspections once the goods had landed in Australia. This places enormous pressures and costs on Australian importers and, more concerningly, it brings the risk onshore. FTA believes that if a concern exists, where possible, seals intact inspections should be carried out by overseas Government counterparts and not post-importation.

#### **Recommendation 1:**

**The department to immediately increase investment in training and compliance processes relating to the Offshore BMSB Treatment Provider Scheme, to ensure that more of the biosecurity risk can reliably be mitigated offshore.**

### 5.2. BMSB profiling, assessment, inspection and treatment of conveyances and cargo arriving in Australia

#### 5.2.1. BMSB Profiling

BMSB profiling remains a mystery to FTA members with general feedback being that tariff categories are too broad and complex.

Of significant concern is that there is no appreciation or discretion for highly compliant manufacturers and suppliers. Relevant examples include:

- Food grade manufacturing;
- Medical manufactured goods
- Original manufactured goods that are sealed and boxed in controlled environments; and
- Aeronautical equipment.

FTA requests that the commodity listings should be reviewed in consultation with industry to target genuine high-risk goods. Consulting with industry will enable tapping into knowledge that may assist to better target/manage the biosecurity risks.

**Recommendation 2:**

The department to expand the Highly Compliant Importer Program (HCIP) to facilitate proven compliant traders. An expanded HCIP program should seek to streamline procedures and allow more resources to be dedicated to genuine high-risk shipments.

**Recommendation 3:**

The department to undertake industry consultation with the view to expand the take-up and implementation of the Safeguarding Arrangements for Brown Marmorated Stink Bug Industry Guide.

*5.2.2. Staffing levels, failures to meet the service charter and concerns regarding staff training*

FTA members have reported significant delays in receiving responses for basic import service requests, with booking responses regularly taking over five days (service charter provides for 95% of bookings to be confirmed within 24 hours) and where several examples have been provided of inspection delays of ten days or more (service charter provides 95% of inspections to take place within three days). FTA understands from the department that these delays relate to a lack of available frontline resources.

In response to the significant and sudden increase in workload associated with the BMSB measures, FTA understands that the department is trying to induct temporary and casual staff, cross-skill existing staff and has been forced to provide extensive overtime hours. This has created a situation where FTA members are increasingly reporting cases of officers with unsatisfactory technical knowledge and examples where customs brokers are required to correct officers when incorrect directions are provided.

Examples of incorrect assessments of BMSB Directions:

- A direction was received by a customs broker stating “*sealing declaration is required*”. It quickly became clear that the full documentation was not read by the officer and the documentation had already been provided. In this situation the customs broker incurred an additional \$30 documentation fee in re-submitting the document and delays in the clearance of goods.
- In another example, an officer closed off a lodgement number before the shipment was assessed, requiring the whole shipment to be re-assessed and re-lodged with COLS.
- In a further example, a direction was received “*sealing direction is required*” even though the container port of loading was a non-BMSB country. This incurred an additional \$30 documentation fee, re-assessment and further delays.

The lack of resources creates an environment where offices are under significant pressure trying to deal with an unsustainable workload. In such cases, errors are bound to occur.

FTA believes that the existing staffing cap does not reflect the volume of trade or the complexity of the risk environment caused by the BMSB emergency measures.

**Recommendation 4:**

The department’s staffing level caps need to be removed to ensure that acceptable service levels can be restored and to enable the department to keep up with increasing volumes and complexity of trade.

*5.2.3. Availability of entomologists, inspections and verifications*

Currently, the department’s entomologists only work five days a week and on restricted hours. FTA has observed examples where this has caused significant delays and costs for industry, especially for weekend arrivals of time sensitive shipments (for example, cut flowers). These arrangements do not reflect the realities of the 24/7 operating environment and should be revised or other solutions should be sought.

Seals intact inspections and verifications also continue to cause significant delays. Through the provision of relevant training, FTA believes that these inspections should be conducted by industry under an Approved Arrangement, rather than officers attending a site and standing idle while an unpack takes place.





Presently, post treatment inspection booking requests cannot be made until the fumigation is completed. Adding to the delays, FTA members have reported a wait of two to four days to receive a response via AIMS. Storage and other associated costs are unavoidable and substantial as a direct result of these delays.

#### **Recommendation 5:**

**The department's entomologists extend their hours to reflect the needs of industry and / or the department allow industry to engage private entomologists to make these decisions out of hours.**

#### **Recommendation 6:**

**The department to consider inspections to be conducted by industry via Approved Arrangements.**

#### **Recommendation 7:**

**Depots should be able to be request verification inspections, irrespective of the status of the fumigation, given the anticipated completion date.**

#### *5.2.4. Treatment timelines*

Directions for goods to be treated onshore within forty-eight hours is not practical and does not reflect the volume of trade and the current shortage of suitable onshore treatment facilities.

Several depots have recently been forced to turn away BMSB containers due to limited space and overwhelming demand created by the emergency measures. Such directions leave both importers and customs brokers liable for Infringement Notices without consideration of the operational realities.

#### **Recommendation 8:**

**Onshore treatment timelines to be extended to reflect the shortage of onshore treatment providers, particularly in Sydney and Melbourne.**

#### *5.2.5. Systems issue – COLS and inspection booking systems*

FTA members have expressed concern regarding insufficient tracking functionality in COLS.

FTA understands that another key IT system for managing BMSB, S cargo, has been the cause of many delays due to the manual processes it requires. S Cargo is not fit for purpose to manage BMSB and we have seen several outages due to the system not being able to manage BMSB volumes.

The booking system also remains an area of major concern. Overwhelmingly, FTA members see value in re-introducing permanent weekly booking arrangements for facilities that have a high volume of inspection requirements but who may not have enough volume to warrant a manned depot arrangement. Permanent bookings arrangements were removed by the department in 2018 creating inefficiencies, particularly when the department is not within their service charter for booking requests.

FTA has received numerous examples where depots were forced to send multiple emails to the department to chase up a booking request. There is no ability to status track a booking request.

FTA members have also raised concerns regarding the utilisation of inspection officers in the field. One FTA member provided the following feedback: *"We have experienced multiple officers attending site for different entry inspections when one inspector could have inspected all entries"*. This is representative of feedback received by several freight forwarders and depot operators, reinforcing the need for a comprehensive review and redesign of the bookings and inspections system.

While we appreciate that particular skill-sets may be required to perform different inspections, an opportunity exists for officers to be cross-skilled to facilitate combined inspections.

FTA understands that the booking system is currently a manual system, with officers relying on excel spreadsheets. Obviously, this is not sustainable. The lack of an advanced, transparent and dynamic booking system is seemingly causing issues to both the department and industry. Ideally, this is an area where IT investment would deliver significant productivity benefits.



**Recommendation 9:**

The Government to undertake detailed industry engagement on COLS user requirements and allocate appropriate investment for any necessary upgrades.

**Recommendation 10:**

The department to consider better utilisation of inspection officers in the field, with an ability to combine inspections at facilities irrespective of importer, freight forwarder, goods and the day of scheduled inspection of each shipment.

**Recommendation 11:**

The Government to undertake detailed industry engagement to review the booking system and allocates appropriate investment for any necessary upgrades.

*5.2.6. Processing of jobs by arrival date*

FTA members have expressed concerns that jobs are currently processed by the vessel arrival date, which is seen as being unfair to proactive companies who lodge their Full Import Declarations (FID) earlier. Customs brokers who lodge closer to the arrival of the vessel are given preference in processing their FID. This has created an incentive for late lodgement. To clarify, FTA does not believe in removing priority processing because there are instances when documentation genuinely arrives late. However, incentives should be available for early lodgement and those behaviours should be encouraged.

One example of an incentive would be guaranteed turnaround timelines on processing (for example five days from the date of lodgement) if the FID is lodged before a prescribed date.

**Recommendation 12:**

The department to consider incentives for the early lodgement of Full Import Declarations (FIDs) to encourage advanced reporting.

*5.2.7. Communication and response times*

FTA members have provided overwhelming feedback that they need access to dedicated BMSB specialist staff at the department, given the complexity of the requirements. To date, much of the communication is via email through COLS or, where a response is not forthcoming via COLS, through the generic Air & Sea Cargo email address.

While some members have suggested an online chat system, which has merit, ultimately a BMSB hotline, staffed by dedicated BMSB specialists, would be extremely helpful as an escalation point. This would be available for urgent escalations where the department is outside of their service charter and where email communication is not appropriate.

**Recommendation 13:**

The department to introduce a dedicated BMSB hotline as an escalation point for urgent BMSB enquiries that meet agreed criteria.

*5.2.8. Directions*

The 2018-2019 season has seen major depot operators advise industry that they can no longer accept BMSB containers due to capacity issues.

FTA believes that industry should have the ability to have an open direction so treatment providers can be changed if needed due to congestion.



**Recommendation 14:**

**The department to implement systems upgrades to allow importers and customs brokers to more easily and efficiently change directions and / or treatment providers and treatment locations.**

*5.2.9. Descriptions of holds*

Container terminals receive a list of target units from the department prior to vessel arrival. The department then place those units in the ICS with the description "AQIS GAS HOLD". This causes several issues. Firstly, the Giant African Snail (GAS) and BMSB affected containers require different handling. GAS units are placed in a dedicated stack away from other cargo and a line of salt is applied around the container stack, pending inspect by an officer, whereas this is not the case for BMSB. BMSB containers can be released from the terminal once they are booked into an approved facility for treatment.

The stevedore common information portal managed by 1-Stop Communications and the ICS both use the same codes for BMSB as for GAS, meaning that a container could potentially be released from the terminal in error, or it could cause delays in the collection of the container from the terminal.

**Recommendation 15:**

**That the Department of Home Affairs make the required changes in the ICS to better reflect the nature of holds that are in place.**

*5.2.10 Union and industry concerns regarding chemical treatment*

The Community and Public Sector Union (CPSU) has expressed serious concerns with the use of Sulfuryl Fluoride and the risk of exposure when handling treated containers. Many in industry share that concern. We also understand that industry and some foreign Governments hold concerns regarding the use of methyl bromide as a treatment methodology, given that it is highly toxic and harmful to humans.

FTA has recently been approached by a major private sector entity regarding a concept that they have shared with the Commonwealth Scientific and Industrial Research Organisation (CSIRO) regarding the development of alternative and safer BMSB treatment methods.

FTA would like the department to support the research and development of additional treatment options that deliver the necessary biosecurity outcomes.

**Recommendation 16:**

**The department should support the research and development of additional treatment options that deliver the necessary biosecurity outcomes.**

*5.2.11. Storage arrangements*

The 2018-2019 BMSB season has resulted in expenses related to delays including missed collection and delivery of import consignments, cancellation of time sensitive orders, the loss in value of perishable goods and additional charges imposed for work undertaken by logistics professionals.

While FTA is aware of compensation avenues available via the *Public Governance, Performance and Accountability Act 2013*, we would like to address one of the most common scenarios, which is fees incurred for wharf storage arrangements.

By way of comparison, FTA is aware that contractual terms exist between stevedores and the Australian Border Force. These arrangements ensure that containers subject to x-ray and/or inspection are offered a storage free period until after the time that the container is physically available and released from border controls. In Sydney, stevedores are forced to provide an extended free storage period from the time the container is released through to the remainder of that day and the following 48 hours. That

requirement is prescribed under Clause 17 of the Port Botany Landside Improvement Strategy (PBLIS) Mandatory Standards. FTA believes that similar arrangements should be in place for BMSB holds.

#### **Recommendation 17:**

**The department engage with industry, state-based regulators and stevedores, to allow extended storage arrangements in prescribed circumstances relating to BMSB holds.**

### **5.3. Approval/accreditation of offshore and onshore treatment providers**

#### *5.3.1. Treatment types*

The delays in the department's announcement of the BMSB 2018-2019 season measures did not provide enough time for onshore treatment providers to scale their operations to meet demand. When the measures were announced, onshore providers reported extremely slow turnaround times for the approval process.

Prior to the BMSB season 2018-2019, FTA understands that all onshore treatment providers accredited for Sulfuryl Fluoride were removed. Industry was not consulted on this action and the providers were forced to re-apply. This limited the onshore capabilities to treat certain goods.

#### **Recommendation 18:**

**The department urgently conduct industry consultation regarding the proposed BMSB 2019-2020 seasonal measures.**

#### **Recommendation 19:**

**Following the BMSB 2019-2020 seasonal measures consultation, the department urgently advise industry of the final detail to allow onshore treatment providers to scale operations to meet demand.**

### **5.4. Engagement and consultation with industry and other stakeholders**

FTA members provided overwhelming feedback that not enough lead time was provided by the department before policy changes were mandated, particularly mid-season. FTA would like to see increased engagement from the department's policy team with industry peak bodies prior to the implementation of new measures. This engagement could help the department to identify any unintended consequences of new policy, if industry has the capacity to meet the requirements and if there are alternative solutions.

#### **Recommendation 20:**

**The department commits to industry consultation for changes to BMSB policy, particularly when those changes occur mid-season.**

#### **Recommendation 21:**

**The department provide industry and the department's operational arm with reasonable lead time before policy changes take effect.**

#### *5.4.1. BMSB 2018-2019*

The department did not effectively communicate to industry the seriousness of the current BMSB season. An example of how the seriousness could be demonstrated is by communicating their detections.

Industry still does not know how many infested consignments there were, where they were detected, how they were detected and what the commodities were.

Industry would greatly benefit from this information, allowing better communication with customers, better communication with suppliers, as well as empowering industry to focus compliance efforts on higher risk consignments.



Industry and Government cannot successfully partner to deliver biosecurity outcomes for Australia when the department is not communicating meaningfully with industry.

### **Recommendation 22:**

**The department to regularly provides industry with an overview of the detections that have occurred and other basic information that relates to Australia's BMSB risk.**

Communications should already be underway for the upcoming season. Industry needs to be preparing now.

FTA has been inundated with questions from concerned importers, freight forwarders, depots, transport operators and customs brokers regarding next season's measures, particularly:

- Will additional countries be added?
- What goods will be included?
- Will there be additional treatments added?
- Will the department look at an expanded role for industry?

These questions need to be answered now to provide industry with enough lead time to prepare for next season's measures.

### **5.5. identifying improvements required to manage biosecurity risks, including legal powers available to manage BMSB risks effectively**

Presently the department's delegate is required to approve treatments of goods when the value exceeds AUD \$1,000,000. This extra layer of approval adds unnecessary red tape and delays.

### **Recommendation 23:**

**The Biosecurity Act to be amended so that importer or customs broker volunteered shipments in excess of AUD1,000,000 be processed without requiring the intervention of the delegate.**

## **6. Statement of thanks and contact information**

Thank you once again for the opportunity to present this submission on behalf of our members.

We look forward to working closely with the Inspector-General of Biosecurity in identifying opportunities to improve the efficiency and effectiveness of Australia's biosecurity regime.

If you have any questions regarding the FTA submission, please direct your enquiries to [acrawford@ftalliance.com.au](mailto:acrawford@ftalliance.com.au) and [tbrooks-garrett@ftalliance.com.au](mailto:tbrooks-garrett@ftalliance.com.au)

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