

Executive Summary

The department's import documentation requirements and assessment settings were largely designed for traditional supply chains in which goods moved directly from manufacturers and were supported by standard manufacturer-issued documentation. The rapid growth of e-commerce has changed this model. Many goods are now purchased online and shipped through fulfilment centres, marketplaces and third-party logistics providers, where manufacturer documents may be unavailable or impractical to obtain. This creates avoidable friction for importers and assessing officers, increases inconsistency in decision-making, and makes compliance more difficult for ordinary consumers. This business case proposes the development of updated work instructions and BICON cases tailored to online purchases, including clear guidance on acceptable alternative evidence where standard documentation is not available.

Problem Statement

Current import conditions and documentation requirements have not kept pace with modern e-commerce practices. In many cases, goods are no longer sourced directly from manufacturers but from fulfilment centres or online platforms that do not hold, issue or provide the same supporting documentation expected under existing settings. As a result, importers may be unable to meet documentary requirements even where the goods themselves are otherwise eligible for import. This creates unnecessary complexity for members of the public purchasing goods online and for officers assessing those goods against BICON cases that were not designed with online retail transactions in mind.

Current-State Challenges

The Biosecurity Import Conditions system (BICON) is the department's authoritative source for determining whether goods are permitted, whether supporting documentation is required, and whether treatment or an import permit is needed. In parallel, the department's minimum documentary requirements policy sets the minimum standards for documents submitted to support biosecurity assessment. Together, these settings support strong biosecurity outcomes, but they can be difficult to apply in an e-commerce environment where supply chain documentation is often fragmented. Assessing officers may need to interpret cases that assume a traditional importer-manufacturer relationship, while online purchasers may only have access to invoices, marketplace listings, order confirmations or fulfilment records. This increases assessment time, creates inconsistent outcomes, and raises the risk of unnecessary delays, rework and customer dissatisfaction.

Proposed Solution

Develop and implement updated work instructions and BICON cases specifically addressing online purchases and e-commerce supply chains. These updates should define when alternative forms of evidence may be accepted, outline decision pathways

for cases where manufacturer documentation is unavailable, and provide practical examples for common online purchasing scenarios. The updated guidance should also distinguish between circumstances where additional evidence is sufficient and circumstances where import cannot proceed without prescribed documentation. Supporting implementation should include communication materials, staff guidance and targeted training to promote consistency in interpretation and assessment.

Expected Benefits

Updating the department's approach would better align policy and operational guidance with current import pathways. Expected benefits include improved clarity for importers, more consistent decision-making by officers, reduced assessment delays, lower administrative burden, and a better customer experience for members of the public purchasing goods online. It would also strengthen compliance by making requirements easier to understand and more realistic to meet, while preserving the department's ability to manage biosecurity risk through clearly defined evidence standards.

Risks and Considerations

Any change to work instructions or BICON cases must maintain Australia's biosecurity protections and avoid creating ambiguity about mandatory requirements. Alternative evidence standards would need to be clearly defined, risk-based and consistently applied. There is also a risk that broader acceptance of non-traditional documentation could be misunderstood by importers unless guidance is precise and well communicated. For this reason, updates should be developed in consultation with operational stakeholders and tested against common commodity and transaction types before implementation.

Recommendation

It is recommended that the department approve a review of current documentation-related work instructions and relevant BICON cases to identify where existing requirements do not adequately reflect e-commerce purchasing models. Following that review, the department should develop and implement updated guidance for online purchases, including acceptable alternative evidence, decision-making principles and staff training materials. This would provide a more practical and consistent framework for assessing e-commerce imports while maintaining appropriate biosecurity controls.