



# IFCBAA

INTERNATIONAL FORWARDERS & CUSTOMS  
BROKERS ASSOCIATION OF AUSTRALIA



## IFCBAA Submission

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To the “Aviation Green Paper Towards 2050”  
of September 2023



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# Introduction

## **IFCBAA's Industry Profile**

The International Forwarders & Customs Brokers Association of Australia Ltd (IFCBAA) is the peak national member owned organisation that represents international freight forwarders and customs brokers in Australia. The majority of IFCBAA member's customers are Australia's importers and exporters.

With origins dating back to 1904, IFCBAA was formed from the merger between two longstanding and respected industry associations in July 2020, from what was the Australian Federation of International Forwarders (AFIF) and the Customs Brokers & Forwarders Council of Australia Inc. (CBFCA).

IFCBAA represents its members in a diverse spectrum of domestic and international trade committees, forums and discussion groups.

## **IFCBAA's Mission**

To be the single independent and influential voice for international freight forwarders and customs brokers in Australia and to promote the professional development of our students and members through continuing professional development (CPD) based education, advocacy, training and compliance.

## **IFCBAA's Primary Objectives**

- To raise the profile of the international trade logistics and supply chain management service industry in Australia.
- Establishing relationships and making representations to domestic and international Government bodies, agencies, statutory authorities and relevant industry organisations to benefit Australian trade and the international freight forwarding and customs brokerage industry.
- To promote the professional development of IFCBAA members through the provision of education and training courses.
- To provide educational pathways for industry entrants through the promotion and delivery of the Diploma of Customs Broking and the Diploma of International Freight, through IFCBAA's RTO division ITALC.
- To support IFCBAA members in regulatory compliance awareness and advocacy, so as to allow members to minimise business and individual risks in dealing with Australia's international trade.

## Executive Summary

This submission is in response to the Aviation Green Paper Towards 2050 (the paper) dated September 2023. The paper requested industry stakeholder input in support of the eventual development of an Aviation White Paper that sets the policy direction for the aviation sector out to 2050.

The purpose of this submission is to provide key summary responses only to those questions posed on aviation security, sustainability, regulatory, compliance and staffing that are directly relevant to IFCBAA and its members, who are primarily international freight forwarders and customs brokers. These responses are a consolidated blend of member feedback and IFCBAA management and director input. This type of approach allows IFCBAA to effectively leverage the depth and breadth of knowledge and experience available through its considerable resources in this field.

IFCBAA looks forward to the positive outcomes of the paper as well as participating in future groups, workshops, working groups and the like.

On behalf of IFCBAA, we would like to thank the Department of Infrastructure, Transport, Regional Development, Communications and the Arts for this opportunity to provide our submission which we hope forms part of the vital decision-making processes that is required to support and advance Australia's aviation sector.

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## IFCBAA Commentary

Chapter #	Question #	Question	IFCBAA Response
5	1	How can Government work with industry to ensure a strong and sustainable aviation sector that supports emissions reduction targets while growing jobs and innovation?	Ensure industry is consulted at all levels when deciding on emission targets and invest in improving airport cargo handling infrastructure, eg. facilities, roads and truck queue areas. Also potential for education funding to support evolutionary equipment/application access and collaboration.
5	2	Given there are a number of measures that industry and government could pursue to help achieve net zero by 2050 in aviation, are there specific measures that more emphasis and support should be given to?	Government regulation to ensure carriers adhere to emission targets, increased development of SAF and digitalisation to minimise/eliminate paper at all supply chain linkage points.
5	3	What should be included in relation to aviation in the Australian Government's Transport and Infrastructure Net Zero Roadmap and Action Plan (including for sectors, such as GA and airports)?	Improved deployment of solar energy and electric vehicle use on airport and increased SAF availability and utilisation.
5	4	How can the Australian Government ensure all emitters in the aviation sector play a role in meeting Australia's emissions reduction targets?	Equitable approach through industry consultation and incentivisation and mandating that all organisations regularly report on progress vs targets. Also improving availability of and better matching demand for SAF.
5	5	What are the benefits and risks associated with updating the National Greenhouse and Energy Reporting (NGER) scheme and/or other policy mechanisms to enable unique claims on sustainable aviation fuel (SAF) sourced through common infrastructure? How can risks be managed?	Timely development of SAF policy and Government audit regime to mitigate risk of inaccurate reporting, with review at intervals to be subsequently agreed, eg. every 3 years.

5	6	What types of arrangements are necessary to support industry confidence in the quality standards and sustainability certification of SAF?	Government to leverage relationships with other countries that are actively pursuing SAF and ambitious net zero policies to create sufficient, cost-effective supply.
5	7	Should policy and regulatory settings be refined to support development of domestic SAF production capability and industry take-up of SAF?	This approach should be prioritised and the burden on fragmented industry sectors to develop SAF reduced. Alternatively, or in combination, the Government may consider industry subsidisation to secure a finished product.
5	8	What are the current and future challenges in developing an Australian SAF production industry, including challenges associated with growing, refining and consuming feedstocks?	As above.
5	9	How can policy and regulatory settings support research and development and subsequent investment in emerging low and zero emission technologies and related infrastructure?	By allowing carriers to engage industry assistance to develop towards emission targets and building a reporting framework to support.
5	10	What information and guidance is needed to support regional aviation's net zero transition in the context of these emerging technologies?	Global carrier engagement to determine and execute best practice processes and initiatives within agreed timeframes.
8	2	Do you have any suggestions to improve current reform processes?	Integrated Government approach to reduce bureaucracy and hasten activity to enact this reform.
8	4	What should the Australian Government consider when determining cost recovery arrangements to ensure a safe, equitable and accessible aviation system?	Cost recovery needs to be spread across all airfreight industry participants – via fuel surcharge for cargo and ticket prices for passengers. Government oversight/controls need to be applied to eradicate price gouging and ensure affordability and that inflationary pressures are minimised.
8	5	Do you support the Australian Government introducing enhanced security obligations?	This is essential in today's world and no effort should be spared to review and evolve standards to the highest level attainable, which should always have paramount importance.

8	6	Do you have any comments about current security screening arrangements?	Some risk with off-airport RACA facilities, in that, unlike some international standards, transport from those facilities to airports is made without enhanced security arrangements in place, eg. sealed vehicle.
8	8	How can Government optimise partnerships with industry to streamline the movement of passengers and modernise the border, while also enhancing security?	Striking the balance between secure travel and minimal delays through consistent, globally-adopted procedures, financed by Government and carriers.
8	9	In the air cargo environment, how could industry and Government better work together to leverage advances in technology as well as industry investments in infrastructure and technology to streamline movement of cargo?	Formation of structured working groups to enable both parties to align on legislation, processes and investments required to achieve common goals. Mandated increased electric vehicle use along with cargo digitalisation on common system/s.
10	1	Can alignment of training with regulatory and licencing requirements be improved?	Potential for Government to invest to fill any identified gaps, eg. aligning security procedure training so all parties operate within a common knowledge framework.
10	2	How can government policy enable industry to support the net zero economy and the future skills, training, and workforce needs that entails (including future fuels)?	Government to improve subsidisation to mandate training, legislate for change and set future compliance policy, eg. how, when and by whom SAF is to be manufactured and sold.
10	4	How should governments and industry prepare Australian workers for the new skills required for the technological transition and net zero fuels?	Government funded training from entry level and practice sustainability in private organisations and public institutions.
10	5	What role can reforms to skilled migration pathways play in addressing immediate aviation personnel shortages?	Continued Government encouragement towards skilled migration for the aviation sector, with focus on operations, IT and security. Aviation should be marketed to complement education and training to become a primary migration pathway program focus to support ongoing recruitment requirements.

10	6	Are there opportunities to improve recognition of overseas training qualifications?	Expand candidate channels by adjusting migration levers and conducting a gap analysis on international vs local training to with aim to reduce time and cost and improve outcomes in filling identified gaps through tailored, supplementary local training. Particular emphasis here towards countries with strong (pre-entry) training programs, eg. various EU countries.
11	1	Are there other issues or concerns associated with the Australian Government's approach to negotiating aviation bilateral agreements that you wish to highlight?	All policies should benefit passengers and cargo alike.
11	2	What opportunities exist to improve the approach to international negotiations?	More bipartisan cooperation and less appeasement of major players to present a united front to improve outcomes for all industry stakeholders.
11	3	Are there problems or potential improvements related to the Australian Government's approach to managing foreign investment in Australian international airlines?	As above.
11	4	What areas should Australia target through its international aviation programs? Are there opportunities for improvement and where would the greatest benefits be achieved?	Increase tourism revenue by facilitating the movement of passengers (and cargo) through our airports more efficiently than is currently the case. Continually invest in airport infrastructure to improve passenger and cargo flow and growth.
11	5	What issues would be important to cover in a review of the framework for New and Redeveloping International Ports?	Improving efficiencies by streamlining airport processes for passengers and cargo to a global standard, maximise digitalisation and mandate more green energy. Increased investment to cater for future demand growth, eg. larger/upgraded airports, more runways and trained ABF and DAFF staff.