



5 DECEMBER 2025

Submission to the Proposed Removal of Additional Nuisance Tariffs

"KEEPING AUSTRALIA'S INTERNATIONAL TRADE MOVING"



Australian Peak Shippers
Association Inc. (APSA)

ABOUT THE ALLIANCE

Freight & Trade Alliance (FTA) is the peak body for the international trade sector with a vision to establish a global benchmark of efficiency in Australian biosecurity, border related security, compliance, and logistics activities.

FTA represents more than 500 businesses including Australia's leading customs brokerages, freight forwarders and major importers.

On 1 January 2017, FTA was appointed the Secretariat role for the Australian Peak Shippers Association (APSA). APSA is the peak body for Australia's containerised exporters and importers under *Part X of the Competition and Consumer Act 2010* as designated by the Federal Minister of Infrastructure and Transport.

APSA is also a member and has board representation on the Global Shippers Forum (GSF) that represents shippers' interests and that of their national and regional organisations in Asia, Europe, North and South America, Africa and Australasia.

FTA / APSA represent leading import and export businesses including world class manufacturers and producers, supported by skilled customs brokers and freight forwarders. A list of all members and further information about FTA / APSA is available at www.FTAlliance.com.au

Freight & Trade Alliance (FTA) and the Australian Peak Shippers Association (APSA) appreciate the opportunity to contribute to this important review. This submission reflects the priorities and operational realities raised by our diverse membership across the international trade, logistics, and supply chain sectors. We remain committed to constructive engagement with government and industry partners to support practical, efficient, and globally competitive regulatory outcomes.

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1. Introduction

Freight & Trade Alliance (FTA) and the Australian Peak Shippers Association (APSA) appreciate the opportunity to comment on the Treasury consultation on the removal of further nuisance tariffs. FTA strongly supports the government's commitment to reducing unnecessary regulatory burden, improving supply chain productivity, and modernising Australia's tariff regime.

As noted in the consultation paper, many low-rate tariff lines impose compliance costs that far exceed the revenue collected. This burden is felt heavily across freight forwarders, customs brokers, importers, and the broader logistics sector. Simplifying the tariff structure will deliver measurable efficiency gains for industry and consumers.

2. Support for the proposed abolition list

FTA/APSA supports the identified list of tariff lines proposed for abolition from 1 July 2026. These lines generally:

- have negligible revenue value
- apply to goods already entering under preferential or concessional rates
- require the same classification and documentation effort as high revenue items
- add little or no policy value

Feedback from our members confirms that even minimal tariffs trigger the full compliance and verification process, including classification checks, origin documentation reviews, and system updates.

3. Industry examples – nuisance tariffs and concessional duplication

While FTA/APSA does not advocate for individual line-by-line changes, we provide the following example to illustrate the practical reality experienced by industry:

Sunglasses (HS 9004.10.00)

A member noted that although the line retains a nominal 5% duty, a long-standing Tariff Concession Order effectively makes many sunglasses imports duty-free. As a result, the compliance effort required to validate the concession outweighs the revenue or policy value. This typifies "nuisance tariff" behaviour across many chapters.

This example is not raised for specific amendment but highlights the systemic nature of low-value, high-compliance tariff lines.

4. Nuisance statistical codes

In addition to tariff lines themselves, FTA members have raised concern regarding multiple redundant statistical codes, particularly in Chapters 61–63 (articles of apparel and clothing; textiles).

Many of these codes are legacy classifications that date back 50+ years to periods when quotas and 50% tariffs existed. Members advise that:

- these codes no longer serve a meaningful statistical, compliance, or policy purpose
- the distinctions are not commercially relevant
- they introduce unnecessary administrative burden in classification
- the same goods could be recorded under one consolidated code without any material impact on trade statistics or border risk management

FTA emphasises that the codes listed in Appendix A are examples only, representing a small proportion of the redundant, duplicative or obsolete codes encountered across these chapters.

If there is a genuine desire to reduce administrative burden, a systematic review and consolidation of these legacy statistical codes should form part of the next stage of reform.

A non-exhaustive sample provided by members is included in Appendix A.

5. Recommendations

FTA/APSA recommends that the Government:

1. Proceed with the abolition of the proposed nuisance tariff lines from 1 July 2026.
2. Engage industry early to ensure systems and databases are updated ahead of the 2026 implementation date.
3. Publish the full abolition list in a user-friendly format, supporting system providers and compliance teams.
4. Undertake a second-phase review focusing on:
 - redundant statistical codes
 - tariff lines where concessions or FTAs already provide full duty relief
 - legacy classifications that no longer align with modern supply chains

6. Conclusion

FTA/APSA commends the Government for continuing the rationalisation of the tariff schedule. Removing nuisance tariffs and modernising outdated statistical structures will reduce friction at the border, lower costs for Australian businesses, and improve the overall efficiency and competitiveness of our trade environment.

FTA/APSA remains available to provide further member insights, case studies, and technical input as this reform progresses.

Submitted by: Freight & Trade Alliance (FTA) and Australian Peak Shippers Association (APSA)



Appendix A – Examples of Redundant Statistical Codes (Chapters 61–63)

The following member-provided examples illustrate redundant or duplicative statistical codes that no longer provide meaningful policy or statistical value and contribute to unnecessary compliance burden. They are **illustrative only**, and not an exhaustive list.

Tariff — Statistical Codes

6107.21.00 — 22 & 46
6108.31.00 — 22, 17 & 26
6108.32.00 — 22 & 61
6108.91.00 — 17 & 63
6108.92.00 — 17 & 64
6110.20.00 — 50 & 52
6110.30.00 — 50 & 52
6111.20.90 — 71, 72, 19, 04, 11, 37, 49 & 79
6111.30.90 — 78, 79 & 81
6116.90 — 12, 13, 14 & 15
6203.11.00 — 22 & 10
6203.42.00 — 02, 16 & 17
6204.62.00 — 02 & 03
6205.20.00 — 54, 09 & 10
6205.30.00 — 54 & 59
6207.10 — 29 & 30
6207.21.00 — 22 & 20
6208.21.00 — 22 & 25
6208.22.00 — 22 & 10
6208.91.00 — 26, 17 & 39
6208.92.00 — 40, 17 & 50
6209.20.90 — 05, 11, 15, 17 & 22
6301.30.10 — 03 & 04
6302.21.00 — 01, 04, 05 & 13
6302.22.00 — 01 & 20
6302.29.00 — 01 & 25
6302.31.00 — 01, 03, 04, 05 & 06
6302.32.00 — 01, 03, 04, 05 & 06
6302.39.00 — 01 & 10
6302.60.00 — 27, 28, 29, 30 & 31
6304.10 — 15, 16 & 17
6304.93.00 — 22 & 33