

8 May 2026



Submission – Draft Regional Standard for Phytosanitary Measures (RSPM): The Safe Movement of Shipping Containers

1. Executive Summary

Freight & Trade Alliance (FTA) and the Australian Peak Shippers Association (APSA) appreciate the opportunity to provide feedback on the draft Regional Standard for Phytosanitary Measures (RSPM) for the safe movement of shipping containers.

FTA is the peak body representing the international trade and logistics sector, including freight forwarders, customs brokers, importers, exporters and logistics service providers. FTA also acts as Secretariat to the Australian Peak Shippers Association (APSA), the designated peak shipper body under Part X of the Competition and Consumer Act 2010, representing the interests of Australia's major exporters and importers.

In principle, FTA/APSA support the objective of minimising biosecurity risks associated with container movements and recognise the importance of coordinated regional approaches.

However, the draft RSPM is high-level and principles-based, and as such, it is not yet possible to fully assess the operational, cost and trade impacts. The material implications will arise at the point of national implementation by individual National Plant Protection Organisations (NPPOs).

From an Australian perspective, many elements of the framework are already reflected in existing practices, particularly:

- use of authorised industry participants through Approved Arrangements; and
- requirement for container cleanliness and supporting declarations.

The primary concern is therefore not the intent of the framework, but the risk of inconsistent, fragmented and potentially impractical implementation across jurisdictions, which may undermine both biosecurity outcomes and trade efficiency.



2. Overall Position

FTA/APSA:

- support a risk-based, internationally coordinated approach to managing pest risks associated with containers;
- recognise the value of aligning regional practices where feasible; and
- note that Australia is already operating a relatively mature system in this space.

However:

- the framework is too high-level to meaningfully assess real-world impacts; and
 - there is a significant risk that NPPO-by-NPPO implementation will diverge, leading to increased complexity, duplication and trade disruption.
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3. Key Systemic Concerns

3.1 High-level framework vs unknown implementation

The RSPM establishes direction but does not define how measures will be operationalised.

Industry is therefore being asked to comment without visibility of:

- compliance thresholds;
- documentation requirements;
- enforcement models; and
- cost implications.

FTA/APSA submit that greater clarity on implementation pathways is required to enable meaningful consultation.

3.2 Fragmentation across NPPOs

While the RSPM aims to promote harmonisation, implementation is left to individual NPPOs.

This creates a risk of:

- divergent requirements across jurisdictions;
- increased administrative burden for multi-country supply chains; and
- reduced efficiency, particularly for transshipment cargo.

This concern was consistently raised by members, who noted that inconsistent application may undermine the stated objective of facilitating trade.

4. Specific Technical and Operational Issues

4.1 Section 1.9 – Documentation and compliance frameworks

The requirement for documentation confirming container cleanliness, subject to agreement between importing and exporting NPPOs, presents a significant practical challenge.

Key concerns include:

- how agreement is achieved across multiple trading partners;
- whether agreements will be bilateral, regional or global; and
- what occurs where agreement is not reached.

The operational risk is that partial adoption across countries may result in:

- country-specific requirements;
- increased documentation layering; and
- delays across supply chains.

Members highlighted that while container cleanliness declarations are already widely used in Australia, any additional or inconsistent certification requirements could increase administrative burden, introduce delays and create confusion across jurisdictions.

4.2 Recognised entities (alignment with Approved Arrangements)

The concept of NPPO-recognised entities aligns closely with Australia's Approved Arrangements (AA) model.

FTA/APSA note that this model can be effective where mature regulatory oversight and audit frameworks exist. However, there is a risk in jurisdictions where systems are less developed or oversight capability is limited.

Inconsistent maturity across countries may result in:

- uneven compliance standards;
- increased risk exposure; and
- reduced confidence in certification outcomes.

4.3 Allocation of responsibility and liability

A key concern raised by members relates to responsibility for container cleanliness. In practice:

- multiple parties interact with a container, including shipping lines, depots, transport operators and exporters; and
- exporters often have limited visibility over the prior history or condition of the container.

Members strongly indicated that responsibility should sit with parties having the greatest level of control over the container at the relevant point in time, particularly shipping lines and empty container depots.

While recognising a move toward shared responsibility models, FTA/APSA emphasise that obligations must be proportionate to control and visibility. Exporters should not be assigned disproportionate liability for factors outside their control.

4.4 Operational and cost impacts

Members identified potential impacts including:

- increased inspection and cleaning requirements;
- additional audit and compliance processes;
- delays at origin and transshipment points; and
- increased supply chain costs.

These impacts are particularly concerning where:

- requirements are duplicated;
- processes are not aligned across jurisdictions; or
- measures are applied without clear risk justification.

4.5 Existing industry practices

Feedback indicates that in some sectors, particularly agriculture, many requirements are already embedded, including:

- container cleanliness processes;
- documentation and declarations; and
- engagement with government monitoring and compliance programs.

Future measures should therefore:

- build on existing frameworks;
 - avoid duplication; and
 - recognise sector-specific maturity levels.
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5. Operational Reality – Supply Chain Complexity

The international container supply chain is:

- multi-party;
- multi-jurisdictional; and
- highly time-sensitive.

Containers:

- move through multiple countries;
- are handled by multiple operators; and
- may be subject to varying regulatory regimes.

Even minor inconsistencies in requirements can therefore result in:

- delays;
- increased costs; and
- disruption to trade flows.

FTA/APSA emphasise the need for practical, scalable solutions that reflect these operational realities.

6. Recommendations

FTA/APSA recommend that Australia advocate for the following in the ongoing development of the RSPM:

6.1 Greater clarity on implementation

- Development of clear implementation guidance prior to adoption.
 - Transparency on how NPPOs are expected to operationalise the framework.
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6.2 Consistency across jurisdictions

- Establishment of minimum baseline requirements.
 - Avoidance of fragmented or country-specific documentation frameworks.
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6.3 Risk-based and proportionate measures

- Measures aligned with demonstrated risk.
 - Avoidance of blanket or duplicative requirements.
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6.4 Clear allocation of responsibility

- Responsibilities aligned with actual control over the container.
 - Recognition of the roles of shipping lines, empty container parks, container owners, logistics providers and exporters.
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6.5 Recognition of existing systems

- Leverage established frameworks such as Approved Arrangements and existing cleanliness declaration processes.
 - Avoid duplication of existing controls.
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6.6 Industry engagement prior to implementation

- Ongoing consultation with industry.
 - Testing of proposed measures against real-world supply chain scenarios.
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7. Conclusion

FTA/APSA see merit in the intent and direction of the draft RSPM.

However, the framework remains high-level and conceptual, and the key risks lie in how it is implemented at a national level.

Without careful design and coordination, there is a real risk of:

- inconsistent application across jurisdictions;
- increased compliance burden; and
- trade disruption without commensurate biosecurity benefit.

The focus must now shift to ensuring that implementation is:

- practical;
- proportionate; and
- consistent across regions.

Yours sincerely,



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