



Australian
BORDER FORCE



Cargo Reporting System Transformation

Discussion paper – Regulatory Cargo Reporting
Systems, Capability Exploration and Market Options

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Cargo Reporting System Transformation initiative

1. Overview

The Australian Border Force (ABF) as Australia's customs service within the Department of Home Affairs (Home Affairs) Portfolio plays a critical role in protecting the border while enabling legitimate trade and travel. It is a key revenue collector for the Commonwealth and is a central regulatory agency responsible for facilitating trade and protecting the community by preventing, deterring and detecting the unlawful movement of prohibited, restricted and regulated goods across Australia's border.

The current cargo reporting system, the Integrated Cargo System (ICS), is a critical system that acts as the sole channel for facilitating the reporting, management, clearance, and risk assessment of all cargo moving across Australia's border. It underpins critical outcomes for the ABF and the Department of Agriculture, Fisheries and Forestry (DAFF) as it supports revenue, biosecurity and border management outcomes for imported and exported goods, as well as supplies critical cargo reporting data to a range of government departments. The Cargo Reporting System Transformation initiative (CRST, or the initiative) emerged from the Government's Economic Reform Roundtable in August 2025 where ICS modernisation was positioned as a key outcome that supports the ABF's mission to protect Australia's border.

This discussion paper asks industry for early feedback to help ABF and DAFF, better understand what the market can offer today in terms of capabilities, technology options and commercial models that could support the modernisation or replacement of the ICS. The questions outlined in this paper are designed to gather practical insights on existing and emerging technologies, integration approaches, commercial solutions and supplier experiences relevant to cargo reporting systems or comparable large-scale platforms that support regulatory outcomes. In providing input, industry may wish to specifically consider current integration with DAFF biosecurity and export systems.

At this early stage of the Initiative, the department is gathering informed perspectives from technology and integration industry members to identify viable modernisation pathways and requirements that will shape future business case development and potential procurement processes.

2. Introduction

2.1. Purpose of the Discussion Paper

This discussion paper is seeking input from technology providers, system integrators and industry vendors to help build an early understanding of the capabilities, technologies and delivery models available in the market.

Submissions should address market capabilities, solution maturity, system integration and data management, implementation and transition approaches, and other considerations relevant to delivery at scale. Stakeholders are encouraged to **provide evidence-based** observations derived from their experience, including core assumptions, dependencies, indicative timeframes and key risks.

The feedback received from the submissions will inform early planning on options toward a modernised Australia's regulatory cargo reporting system. ABF and DAFF will consider submissions received in informing the development of design principles, high-level requirements and implementation options, including transition and funding considerations, to support future advice and proposals for government consideration.

This discussion paper is intended for **information-gathering purposes** only and does not constitute a procurement process, request for tender, or invitation to negotiate nor is a commitment to engage in commercial relationships with any respondents.

3. Scope of this Discussion Paper

3.1. In Scope

This section defines the topics and types of input the department is seeking to support early exploration of options for a modernised cargo reporting system and associated delivery approaches.

- Modernised cargo reporting systems used domestically and internationally
- Technological capabilities
- Delivery and partnership models
- Integration approaches and data architectures
- Transition and migration considerations
- Projected long term commitment of effort, engagement and funding

The department may consider out of scope items in future phases of the CRST through targeted consultations that may occur as required at a later stage of the process.

3.2. Out of Scope

To support clarity and probity, the following matters are out of scope for this discussion paper. This paper is for information gathering to inform future planning and does not constitute a procurement process, request for tender, or invitation to negotiate. Stakeholders may provide high-level observations on risks, constraints and considerations relevant to the CRST; however, detailed evaluation and commercial discussions will occur through subsequent phases.

- Procurement (including any request for tender or other sourcing activity).
- Commercial negotiations (including pricing negotiations or contract terms).
- Vendor evaluation or product comparison (including ranking, scoring, or endorsement of specific suppliers or solutions).
- Definitive statements on technical, operational, policy or legislative limitations.
- Consideration of specific user functionality and the access and use of data, which will be considered in later stages of the information gathering process.

Stakeholders are welcome to provide high-level observations and risks; however, detailed assessments will be undertaken when required through subsequent phases of the CRST.

How to Participate

Submission instructions

Written submissions are invited in response to the questions in Section 6. You may respond to all questions or only those relevant to your organisation. Detailed instructions (including preferred formats and contact details) are provided in Section 7.

Closing date

The closing date for submission is **1700 AEST, 03 July 2026**. Late submissions will not be considered.

Privacy, confidentiality, and information handling arrangements

The CRST team will handle submissions in accordance with applicable Commonwealth legislation and policies. This consultation is being conducted on behalf of the Australian government and, unless marked otherwise, submissions may be shared with other Australian government agencies to facilitate alignment with broader government objectives.

- If you would like your submission (or parts of it) treated as confidential, clearly mark the relevant sections as “Confidential”.
- Submissions may be subject to disclosure obligations, including under the *Freedom of Information Act 1982* (Cth).
- Personal information will be handled in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

Accessibility and translation options

If you require this discussion paper or submission process information in an alternative format, or would like to discuss accessibility or translation support, please contact the CRST team at CRST@ABF.GOV.AU.

- Support to participate in consultation activities as the project progresses.
- Assistance to facilitate communication needs (for example, arranging an interpreter), where feasible.

4. Background

4.1. Overview of the Integrated Cargo System (ICS)

The ICS is Australia’s central trade reporting platform supporting the movement of goods across the border. It is a single integrated channel used by government and industry to exchange information on goods traded internationally. The system and functionalities are heavily integrated, highly complex, and significant engagement will be required to implement system change and modernisation.

The ICS is a digital system however its design is based on a pre-digital business model that requires a significant level of modernisation to align Australia’s cargo reporting system to the contemporary trade environment. The current ICS design and architecture creates limitations and complexities on efforts to modernise and streamline trade regulations.

Implementing the level of modernisation required is expected to take incremental delivery across 7 to 10 years, where ABF and DAFF must drive coordinated change across legislation, policy, business processes, operating arrangements and technology.

The discussion paper will support assessment of current market considerations, capability, and capacity, and to benchmark potential approaches against best practice within the international trade environment.

4.2. Role of DAFF and Other government departments

The ICS is the primary system for managing imports and exports in Australia and is managed by Home Affairs. DAFF plays a central regulatory role in Australia’s biosecurity system and agricultural exports, and is a co-user of ICS systems, data and services. Specific regulatory requirements in relation to cargo reporting information are delivered through ICS, supported by defined integration points within the ICS environment. A future cargo reporting system must support end to end regulatory functions across government.

Trade data is a valuable asset used to form insights and implement decisions for the public interest. Government departments rely heavily on trade data to fulfill their statutory obligations including to undertake risk assessments, shape policy, strategic direction and economic analysis. Other government agencies using the system include, but are not limited to, the Australian Bureau of Statistics, Australian Taxation Office and Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts.

A modern system with improved capabilities would enable government agencies to conduct business using timely, structured and integrated data. Given multiple agencies rely on cargo reporting data and its integration with the ICS, specific needs will be established as part of the design process should the CRST progress.

4.3. International Engagement

Targeted international engagement will be undertaken through the ABF's network to benchmark approaches and identify lessons learned from comparable regulatory cargo reporting system reforms. The ABF aims to leverage its established international networks with overseas customs administrations and relevant international bodies, focusing on lessons learned and insight into governance, standards, transition approaches, and implementation risks. This will support DAFF consideration of learnings for meeting biosecurity and export requirements.

The insights gained would also provide a more comprehensive understanding of how comparable systems enable multi agency coordination across government. The engagement activities will support the ABF to identify approaches that strengthen whole of government data sharing, trade compliance, national security functions and biosecurity management.

5. Key Questions for Stakeholder Feedback

The following questions are intended to support structured input from stakeholders on potential approaches, capabilities, constraints and risks relevant to the CRST. Respondents are welcome to address all questions or only those most relevant to their experience. Where helpful, please provide examples, assumptions, dependencies and indicative timeframes to support your views. Please clearly identify any confidential information in your response. This consultation is for information gathering only and does not constitute, or form part of, a procurement process.

5.1. Solution Approach / Product Type

There are multiple options for delivery of a major Cargo Reporting System (CRS), including in-house building of a system/s, buying and potentially customising off-the-shelf systems and combination pathways that utilise purchased elements, custom build and re-use. Based on previous experience in this space in building, implementing or using systems of a similar type/level of complexity, the ABF is interested in exploring which approach may best support regulatory compliance, cargo reporting obligations, industry interoperability, and border risk management.

1. In your experience, which of the buy/build/dual pathways have you encountered? Which of these have proven to achieve the most appropriate outcomes?
2. We are also interested in the following when considering solution approach:
 - alternative commercial or delivery models that can be offered
 - benefits and risks associated with each model for border regulators
 - option(s) that would best meet border regulators' operational requirements
 - international market solutions used in cargo or border environments that may be suitable for Australia
 - key lessons learned that should inform the approach
 - how current offerings align with the Australian context and likely adaptations required to support border regulators.
3. With regard to the technical solutions and product types on the market, how could emerging and established technologies (such as cloud-based platforms, automation, advanced analytics and artificial intelligence) be applied to support a modern cargo reporting environment, including associated benefits, risks and constraints.

5.2. System Capabilities & Features

To support the development of a future CRS, respondents are invited to provide high-level insights on contemporary industry practices and innovations. Responses may highlight key capabilities, system functionalities, design considerations, that could inform the development of a modern, scalable, and integrated regulatory cargo reporting environment within an operational border and customs context.

1. What services or capabilities does the system offer? This could include software products, system integrator services, and governance support.
2. At a high level, what emerging capabilities, trends, or service approaches could influence future cargo reporting systems over time.
3. Where relevant, what system or service characteristics may be important to consider in a regulatory cargo reporting context.

5.3. Delivery Models & Implementation Approaches

To inform considerations of delivery and implementation approaches for a future CRS, the ABF seeks high-level input on delivery models, implementation practices, and transition approaches currently used in the market. Responses may outline how different approaches could support effective design, delivery, governance and transition to a modern, scalable and integrated regulatory cargo reporting environment within an operational border and customs context.

1. Which delivery pathway do you recommend for a modern customs and cargo reporting environment (COTS, bespoke, or dual). Please consider the following points when formulating your response:
 - For each identified pathway, outline its feasibility within an operational customs and cargo reporting environment, the market maturity of relevant technologies or solutions, and any prerequisites such as data access, industry partnerships, or integration dependencies.
 - For each pathway, what are the main cost drivers, are there opportunities to streamline delivery, reduce cost and implementation risk (e.g., phasing, reuse, standards-based approaches).
2. What funding approach is recommended to support sustainable investment across the technology lifecycle, including ongoing system maintenance, enhancements, integration costs, and long-term digital capability uplift.
3. What implementation may look like (e.g., discovery → pilot → rollout), including the anticipated timeframes for each stage.
4. Are there governance and project/program management models used in comparable international programs that have proven effective, and outline which model is recommended for an ABF-DAFF partnership (including decision rights and cadence).
5. Are there transitional approaches or phased pathways that could be supported to assist government in moving from current arrangements to a future cargo reporting model.
6. How does your organisation typically engage with government stakeholders? Is there a preferred approach for working with the ABF, DAFF, and ICT delivery groups during design, transition, and operational phases?
7. The information or access required from ABF, DAFF, or other stakeholders to enable a more tailored view at a later stage (e.g., data samples, interface information, or key contacts).

5.4. Cost Efficiency & Delivery Timeframes

Based on previous experience, what indicative timeframes could be anticipated for onboarding, implementation and transition from commencement to steady-state operations. In responding, you may wish to comment on typical design and development timeframes for mature trade systems and identify cost-saving approaches that have proven effective in comparable implementations.

Caveat - For this discussion paper, respondents do not need to consider government budget or funding processes. Please assume funding is available and focus on realistic delivery timeframes.

1. Based on previous experience, what realistic timeframes are anticipated for onboarding, implementation, and transition to steady-state operations?
2. Any cost-saving opportunities or levers that have proven effective in comparable implementations (e.g., reuse of components, standards-based integration, sequencing).
3. In your experience the average time and design and development of a modern mature trade system.

5.5. Maturity & Technical Sophistication

To help build an understanding of solution maturity for future cargo reporting options, the ABF invites high-level insights on the operational maturity of market solutions. Responses may outline how solutions are being used in practice, their suitability for broader regulatory use, and how capabilities may develop over time.

1. How mature are the relevant solutions in terms of operational use? Provide references to deployments and scale where possible. Please consider the following points when formulating your response:
 - The emerging capabilities expected to be developed over the coming years that will notably enhance overall solution maturity.
 - Your organisational experience in developing a CRS or comparable system, including the regulatory outcomes achieved and any independent certifications obtained.

5.6. Further Considerations

To help ensure a comprehensive view of potential future cargo reporting options, respondents are invited to share any additional considerations based on their experience. Please outline any additional technical, operational, regulatory, or commercial considerations including insights, dependencies, or risks that may inform a comprehensive and sustainable future cargo reporting system.

6. Submission Process

6.1. How to respond

Instructions for submitting written input

Submissions are invited from industry participants, technology providers, and other stakeholders with relevant expertise. You may respond to all questions in this paper or only those most relevant to your organisation. Please provide your input in sufficient detail to support the ABF and DAFF to understand your perspective and (where relevant) the assumptions that underpin it.

- Your organisation name and primary contact (name, role, email, phone).
- A brief overview of your organisation's relevant experience/capability (optional).
- Responses to the questions in Section 5 and any additional comments or considerations.
- Where proposing an option or approach, describe benefits, risks, dependencies, indicative effort/timeframes, and any prerequisites (for example, data, standards, legislative or process changes).
- Clearly mark any content you consider confidential.

Submission format and contact details

Please submit written input electronically by email to: CRST@ABF.GOV.AU

Where possible, include “CRST Discussion Paper – Submission” in the email subject line. The closing date for submission is 1700 AEST 03 July 2026.

- Preferred formats: Microsoft Word (.docx) or PDF.
- File naming suggestion: *[OrganisationName]_CRST_Submission_[ddmmyyyy]*.
- If your submission is large or includes multiple files, please indicate this in your email and propose an alternative transfer method.
- If you require accessibility support (for example, alternative formats) please contact the team at CRST@abf.gov.au

6.2. Consultation Timeline

Key dates

| Milestone | Date |
|---------------------------|----------------------|
| Discussion paper released | Friday, 22 May 2026 |
| Submissions close | Friday, 03 July 2026 |

Next steps in the process

Following the close of submissions, the ABF and DAFF will review and consider the information provided to inform the next stages of the CRST. Next stages may include additional consultation and market engagement activities.

- Analyse submissions to identify themes, opportunities, risks, and implementation considerations.
- Use insights to refine problem definition, design principles, and potential delivery and funding options for future consideration by government.
- Undertake further consultation activities (for example, targeted workshops, technical deep-dives, or follow-up requests for information) as required.
- If a procurement process is undertaken in the future, it will be managed separately and in full accordance with the Commonwealth Procurement Rules (CPRs).

6.3. Use of Information

How responses will be handled

- Submissions will be reviewed by the ABF and DAFF to inform research, options development, and planning for future phases of the CRST.
- Responses may be collated and analysed to identify common themes, opportunities, risks, and implementation considerations.
- Information provided may be used to support internal briefings, development of business cases, and future consultation materials.
- Respondents may be contacted through the CRST Team to clarify matters raised in a submission.
- This consultation process is not a procurement and will not be used to shortlist, evaluate, or rank suppliers.

Confidentiality and attribution statement

If you would like your submission (or parts of it) to be treated as confidential, please clearly mark the relevant sections as “Confidential”. The ABF and DAFF will handle information in accordance with applicable Commonwealth legislation and policies, including privacy and information access requirements.

- Confidential information should be clearly identified and, where possible, supported with a brief explanation of why it is confidential (for example, commercially sensitive material).
- Reasonable steps will be taken to protect confidential information; however, submissions may be subject to disclosure obligations, including under the *Freedom of Information Act 1982* (Cth), and other legal or parliamentary requirements.
- If the CRST team receives a request for access to a submission, the ABF may consult with the respondent where appropriate.
- Personal information will be handled in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

7. Closing Statement

Home Affairs, the ABF and DAFF thank you for your time and contribution. Individual **feedback will not be provided** on respondent submissions, however, you may be contacted directly to seek clarification or additional information.

Further consultation activities will also be undertaken as the project progresses to canvas additional considerations, refine options, and ensure that stakeholder perspectives continue to inform subsequent phases of design and delivery.

The modernisation of Australia’s cargo reporting systems is essential for national economic prosperity and resilience, border security, and international trade competitiveness. Stakeholder consultation is critical to developing a future cargo reporting system that is future-proof, efficient, and globally aligned.

8. Definitions & Acronyms

Definitions

| Term | Definition |
|---|---|
| Cargo Reporting System (CRS) | The future-state cargo reporting environment that will support the reporting, management, clearance and risk assessment of goods moving across Australia's border. |
| Cargo Reporting System Transformation (CRST) | The multi-year Initiative to modernise Australia's cargo reporting system(s), including technology, operating model, and supporting policy, legislative and process settings. |
| Commercial off-the-shelf (COTS) | A pre-built product or platform that is purchased and configured to meet requirements, rather than developed entirely bespoke. |
| Discovery | An early delivery phase focused on clarifying scope, users, requirements, constraints, and solution options to inform subsequent design and delivery decisions. |
| Freedom of Information (FOI) | A legal framework for public access to government-held information, including under the <i>Freedom of Information Act 1982</i> (Cth). |
| Interoperability | The ability for systems, organisations and processes to exchange information and use it effectively. |
| Integrated Cargo System (ICS) | The current cargo management system used as the authorised channel for reporting imports and exports and supporting cargo management and clearance processes. |
| Market engagement | Activities undertaken to gather information and input from industry, suppliers and stakeholders to inform options, planning and decision-making. |
| Operational use (solution maturity) | The extent to which a solution is deployed and used in live environments at scale, including demonstrated performance, resilience and supportability. |
| Personal information | Information or an opinion about an identified individual, or an individual who is reasonably identifiable, as described in the <i>Privacy Act 1988</i> (Cth). |
| Pilot | A limited implementation used to validate a solution, approach or capability prior to broader rollout. |
| Procurement | A formal process for acquiring goods and services, conducted in accordance with applicable rules and requirements (including the Commonwealth Procurement Rules). |

| Term | Definition |
|--------------------------------------|--|
| Service Level Agreement (SLA) | An agreement that specifies service performance and support expectations (for example, availability, response times and incident management). |
| Sustainment | Ongoing activities required to operate, support, maintain and improve a system over its lifecycle. |
| System integrator | An organisation responsible for integrating multiple components, products and services into an end-to-end solution, including design, build/configuration, testing, deployment and transition. |

Acronyms

| Acronym | Meaning |
|-------------|---|
| ABF | Australian Border Force |
| AEST | Australian Eastern Standard Time |
| APPs | Australian Privacy Principles |
| COTS | Commercial off-the-shelf |
| CPRs | Commonwealth Procurement Rules |
| CRS | Cargo Reporting System |
| CRST | Cargo Reporting System Transformation initiative |
| DAFF | Department of Agriculture, Fisheries and Forestry |
| FOI | Freedom of Information |
| ICS | Integrated Cargo System |
| ICT | Information and Communications Technology |
| SLA | Service Level Agreement |