

31 March 2026



Submission – General Review of the Indonesia-Australia Comprehensive Economic Partnership Agreement (IA-CEPA)

Freight & Trade Alliance (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.

This submission focuses on practical impediments experienced by industry in utilising IA-CEPA preferences, particularly in relation to certificates of origin (CoO). While the Agreement has supported strong growth in bilateral trade, current origin documentation requirements continue to create friction in accessing preferential outcomes.

A key issue is the lack of streamlined and consistent approaches to origin certification. Across Australia's broader FTA framework, there has been a progressive shift toward self-certification models, enabling importers to rely on declarations completed by exporters or producers. Expanding and reinforcing this approach under IA-CEPA would reduce administrative burden, improve accessibility for small and medium enterprises, and better reflect modern commercial practices where supply chains are dynamic and documentation must be responsive.

Reliance on traditional CoO frameworks can introduce delays, additional costs, and unnecessary complexity, particularly where goods are traded frequently or involve multiple product variations. A more flexible system that prioritises self-certified origin declarations—while retaining government-issued CoOs as an option—would enhance trade facilitation and increase utilisation of IA-CEPA preferences.

A further issue relates to the retrospective application of preferential treatment. Current arrangements limit the ability of importers to obtain valid origin documentation beyond relatively short timeframes, despite the fact that compliance and verification activities may occur well after importation. As with other agreements, the Australian Border Force retains the ability to review import declarations for several years, creating a disconnect where legitimate claims to preferential treatment cannot be substantiated due to documentation timing constraints.

Allowing for retrospective issuance of CoOs over a longer period, and recognising validity from the date of issue rather than export, would better align administrative processes with regulatory realities. This would ensure that goods which genuinely meet IA-CEPA origin requirements are not excluded from preferential treatment due to procedural technicalities.

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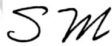
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While concerns may be raised regarding the integrity of self-certified origin declarations, international experience demonstrates that these systems can operate effectively when supported by appropriate compliance, audit, and enforcement mechanisms.

In summary, reforms to origin certification processes under IA-CEPA—particularly expanded use of self-certification and greater flexibility in retrospective documentation—would reduce unnecessary barriers, improve utilisation, and ensure the Agreement remains fit for purpose in an evolving trade environment.

Yours sincerely,



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