

JBMS Programme

TSW Project Industry Consultation Paper

Updated following meetings of 21-24 February 2012

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PURPOSE

The purpose of this document is to provide cargo logistics industry members with an update of changes to Customs and MAF processes being included in the development of the Trade Single Window (TSW), and to consult on some particular processes to ensure we understand the impacts on industry members.

This phase of consultation focuses on points that will impact on system design decisions. We will communicate and consult further throughout the design and build phase.

Version 1 of this document was pre-issued to industry members who registered to attend meetings held at Auckland Domestic Airport on 17 August 2011 (mainly freight forwarders/integrators/consolidators and airlines reps), and at Ports of Auckland on 19 August 2011 (mainly shipping line, shipping agent and port company reps). Versions 2 and 3 added the Customs and MAF representatives' notes of the key points that arose from discussion in those two meetings, in subsequent emails we received, and in a follow up meeting with the Air Cargo Council on 8 September 2011.

In version 4, the layout was amended to set out the content under headings for each stakeholder group, while retaining discussion points from previous meetings. Updates on outstanding matters for final consultation were shown, along with some clarifications and corrections. It was pre-published for discussion at consultation meetings held in Auckland, Christchurch and Wellington over 21-24 February 2012.

This version 5 records what Customs and MAF consider to be the accepted approach resulting from those meetings, with a summary of consultation for key elements. As with previous versions, it will be published on the Border Sector page of Customs' website for general feedback. It will also be provided to industry representative bodies for feedback, before being submitted for discussion at the 18th April 2012 meeting of the Tomorrow's Cargo Logistics forum. Agency procedures will be finalised following that meeting.

EFFECTIVE DATE FOR CHANGES

Unless otherwise indicated, the procedure changes will be introduced gradually as industry members start to adopt the new cargo reporting messages outlined below. These new cargo reporting messages will be mandated 18 months after TSW goes live. This adoption period was requested by industry during 2009 consultation. We expect TSW to go live in the first quarter of 2013, meaning the new messages (and therefore most of the new procedures) will be mandatory from around mid 2014. The impact of the changed procedures will be monitored along the way to ensure they achieve agencies' objectives and do not create unmanageable difficulties for the industry.

NEW WCO VERSION 3 MESSAGES

The new messages do involve new data elements, but in most cases these are to do with technical transmission information, or involve optional new information to facilitate clearance. Draft versions of the Message Implementation Guidelines are currently available [online](#). These will be finalised over the next few months, when final versions will be published.

FEEDBACK BY 16 APRIL 2012

Industry members are encouraged to provide any feedback on this document to jbms@customs.govt.nz or to their industry representative body by 16 April 2012 so that any final concerns can be considered before the Tomorrow's Cargo Logistics meeting on 18 April 2012.

OVERVIEW OF NEW LODGEMENT MESSAGES

The following table provides a summary of the lodgements discussed in this document:

Lodgement	Abbreviation	Comment
Advance Notice of Arrival	ANA	<p>Fax and email submission replaced by new *WCO3-based message submissible via messaging or web channel</p> <p>For commercial vessels, incorporates Inward Report information if known, precluding the need for an Inward Report</p> <p>ANA will not be required for scheduled commercial aircraft - agencies will instead reuse the API ANA for TSW purposes, where available</p>
Inward Cargo Report (including low value imports clearance)	ICR	<p>New WCO3-based message incorporating MAF BACC data</p> <p>New requirement for airlines to report all cargo on board at master and house level detail</p> <p>New requirement for an ICR for sea freight consolidation/FAK/LCL shipments</p> <p>New requirement for positive indication that low value write-off is requested</p>
International Transhipment Request	ITR	<p>Replaces Customs' Transhipment for Export messages within ICR or via ECI</p> <p>New WCO3-based message incorporating MAF risk data</p>
Domestic Transhipment Request	DTR	<p>aka "Under Bond Cargo"</p> <p>Electronic submission via messaging or web channel replaces Customs' "Paperless Transhipments" and hard copy "Permit to Remove"</p> <p>New WCO3-based message incorporating MAF BACCA data</p>
Import Declaration	Import Dec	New WCO3-based message incorporating MAF BACCA data
Export Declaration	Export Dec	New WCO3-based message
Cargo Report Export (low value export clearance)	CRE	New WCO3-based message
Advance Notice of Departure	AND	<p>Electronic submission via messaging or web channel</p> <p>New WCO3-based message based on Customs' Outward Report form</p>
Outward Cargo Report	OCR	New WCO3-based message
Excise Declaration	Excise Dec	New WCO3-based message - minimal change

*World Customs Organisation Data Model Version 3

GENERAL CHANGES

There are a few points for all industry members to note:

- a. **All lodgements will be submissible via messaging or the web channel**, and we are developing capability for lodgements made by messaging to be adjusted and viewed via the web channel.
- b. **All lodgements will be submissible in both the XML and EDIFACT format.** However, **attachments are only possible in XML**, so EDIFACT messaging clients will need to submit attachments to a lodgement via the web channel.

Consultation summary:

- i. At the first consultation meetings, airline reps asked if the IATA format would be accepted by TSW. JBMS reps advised it would not, as it requires significant effort to enable transformation into the WCO3 format. We are not aware of other administrations accepting the Cargo-IMP format; EDIFACT and XML are the international standards for administration and trade, which are administered by UN/CEFACT.
 - ii. In addition, we received advice from IATA that it is envisioned the Cargo-IMP edition of 2014 will be the last, and it would not amend Cargo-IMP as of that date as IATA is encouraging the industry to move to XML, and promotes Customs messages being pushed to Customs, not trade and transport messages. Airlines and the air cargo community will still be free to use Cargo-IMP, and it will probably continue to be used for some time as it is a big part of the airlines' legacy systems. However, typically service providers provide relays as well as translation services, so an airline may continue to send Cargo-IMP messages to their service provider who can then map the information into the message format that Customs requires.
 - iii. So for the New Zealand TSW, airlines can either transform their messages into the WCO EDIFACT/XML messages, or continue to use ECN or another message transformation service to do this.
 - iv. The Air Cargo Council advised they had checked with overseas systems experts who advised this is what occurs elsewhere, and they see no problem with the requirement.
- c. As signalled in 2009 consultation, **electronic "delivery orders" will be mandated**. This means any party requiring Customs or MAF approval to release goods (whether final or conditional release) from their premises (e.g. Customs Controlled Areas and MAF Transitional Facilities), must be capable of receiving TSW response messages electronically i.e. via messaging, the web channel, or email. Customs and MAF indicated in earlier consultation that we would like to mandate electronic "delivery orders" from the TSW go-live date (expected in the first quarter of 2013).

Consultation summary:

- i. While it's our preference to achieve early mandating of electronic delivery orders, analysis indicates it would be too problematic. At this stage, our plan is to see how it goes when TSW goes live, and revisit this matter if the use of an array of printed Customs delivery orders and MAF instructions, combined with gradual uptake of electronic delivery orders for new messages, is causing issues. **At the latest, electronic delivery orders will be mandated when the new WCO version 3 messages become mandatory (expected around mid 2014, as discussed on page 2 above).**

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- d. We identified the desirability of a **common voyage or flight identifier** to be shown on notices, reports, movements and declarations to facilitate accurate reconciliation of these submissions to ensure all cargo is reported and moved according to Customs and MAF instructions. For seafreight, we are aware the voyage number can vary between the prime carrier and space sharing carriers, so we proposed using the vessel code plus the prime carrier's voyage number. For airfreight, we are aware the flight number can vary between the prime carrier and code-sharer carriers, so we proposed using the prime carrier's flight number and the arrival date.

Consultation summary:

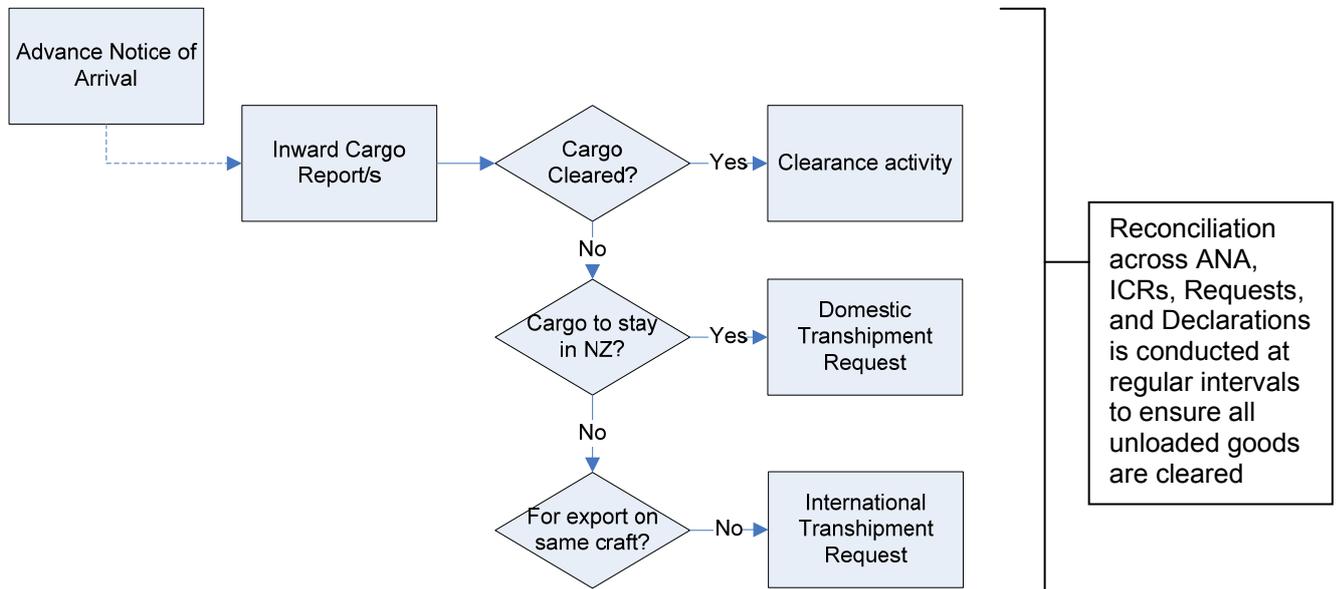
- i. Shipping and airline industry meetings advised there are obstacles to the air and sea identifiers we proposed. The voyage/flight number used by the space-sharer shipping line/code-sharing airline is what is advised on the bill of lading/air waybill, so is all that is known by the consignor, consignee and freight forwarder. Industry reps considered there would be real difficulties in trying to communicate the prime carrier's voyage/flight number across the various parties involved. Agency reps recognised the issue and undertook to look into what other administration do, which did not identify a solution. As a result, Customs and MAF agreed that TSW will accept all code share identifiers and voyage numbers, and we will map these for cargo reconciliation as necessary.
- e. **The reporting period for uncleared cargo** was a new item Customs and MAF added for discussion at the 21-24 February meetings. The current procedure for monthly reporting of uncleared cargo to Customs by Customs Controlled Areas (CCAs) means Customs may not be advised for up to 46 days after importation that the goods have not been cleared, which undermines risk management. While cargo reconciliation introduced with TSW will contribute to improving this, it will take quite a while to get this working well, and we are likely to still require CCA reporting anyway.

Consultation summary:

- i. We sought feedback on what is the minimum period CCAs could cope with. The general consensus was that it is rare for cargo not to be cleared within 14 days of importation, so it would be acceptable to require reporting of all cargo remaining uncleared 14 days after importation. Customs and MAF undertook to consult with large CCAs such as Tappers before making this change.
- f. **Additional seafreight matters** discussed at the February 2012 shipping and ports meeting were:
- i. **Bulk change upload:** The TSW includes the ability for a shipping company to advise Customs and MAF of a change of port of discharge/loading or a change of ship, and for Customs to generate a "bulk upload" of the new information. This will enable all transshipment approvals and import and export delivery orders associated with the change to be amended and re-transmitted to the new port of loading/discharge.
- ii. **Data from ICRs provided to ports:** Agency reps advised that port companies were keen to receive data from carrier ICRs that could help inform port logistics, and asked if shipping companies had any concerns about any particular information being proved. Shipping company reps confirmed they had no concerns. Agency reps undertook to hold a workshop with ports to confirm data of interest – this will be scheduled once work on the messages to meet project deadlines is complete.

AIRLINES, AIR CARGO TERMINAL OPERATORS AND FREIGHT FORWARDERS

Inward Airfreight Reporting



1. Advance Notice of Arrival (ANA)

- a. Submitted by the person in charge of a craft, or the operator/owner or their agent. The purpose is for initial advanced risk assessment of the craft, crew, passengers and cargo (the latter reported on an Inward Cargo Report – see below) by Customs and MAF.
- b. Receipt of the main ANA document is required for all craft as it triggers the automated reconciliation process for ensuring all Inward Cargo Reports have been submitted.
- c. For commercial scheduled flights, we are looking to transfer the ANA submitted for Advanced Passenger Information (API) purposes to TSW for Inward Cargo Report reconciliation purposes, as no additional particulars are currently required other than the number of cargo reports that will be lodged, which we are working through. Where no API has been lodged, an ANA will need to be submitted.

Consultation Summary:

- i. As API is provided for every arriving and departing flight because crew must be reported on API even if there are no passengers, airlines were happy with the approach to use the API message to fulfil the ANA requirement. The use of the API submission to satisfy the ANA requirement is therefore confirmed.

2. Inward Cargo Report (ICR)

- a. To enhance understanding of the risk posed by the craft, we would like the carrier to submit an ICR for **all** cargo on board, and in all cases report both master and house level details. This applies to cargo destined for New Zealand, including freight forwarders' consolidation consignments; cargo remaining on board (sometimes referred to as transit cargo); and international transshipment cargo (sometimes called "transfer cargo"). The Ministry of Transport supports this proposal.
- b. As per the current process, there may be one or more carrier-level ICRs for a craft. ICRs form part of the ANA, so as currently, will be required to be lodged at least two hours before arrival of the flight ETA.

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- c. We are developing a message for the new ICR based on the WCO3 data model. This provides for much of the data relevant for Customs and biosecurity risk assessment (incorporating MAF BACCA data as far as the information available at the time can satisfy), including the option to provide entity and goods codes e.g. supplier, importer, tariff classification; GS1 product code or classification. The more complete and high-quality the data provided, the greater the opportunity for facilitation and advance advice of any border requirements.
 - d. The ICR at carrier level will include the ability to submit an International Transshipment Request (ITR) or Domestic Transshipment Request (DTR) for advance approval to move the relevant consignments to a Customs Controlled Area/Transitional Facility (CCA/TF) awaiting export on another craft (whether air or sea), or awaiting import clearance. If such a request is not made in the carrier ICR, a separate ITR or DTR will need to be submitted (see items 3 and 4 below).
 - e. **If the freight forwarder is approved to submit an ICR for its consolidation consignments directly to Customs and MAF, those ICRs can also include International Transshipment Requests (ITRs) and Domestic Transshipment Requests (DTRs).**

Consultation Summary:

- i. In regard to the carrier reporting all cargo at house bill level detail, airlines advised they have to do this for the US and EU, and consider that Customs and MAF should mandate that airlines do so here, which will allow them to require freight forwarders to provide the information at the point of departure. **Airlines noted that some major multinational freight forwarders do report direct to the border agencies though.**
- ii. **One or two freight forwarders were concerned about confidentiality, in that this would enable airlines to access customer details for direct contact. But the consensus was that airlines can already do that via information on air waybills, and would already have made approaches if they were interested in dealing with individual clients.**
- iii. **Customs and MAF therefore intend to mandate that airlines report both master and house details for all cargo on board a flight, unless the freight forwarder is approved to report house level details for its consolidation consignments directly.**
- iv. Airlines were concerned about the details required in the new ICR. Agency reps explained that while there are some changes to header information etc, many of the new elements will be optional, not mandatory, to assist with early risk assessment and clearance. **JBMS reps agreed to provide the air Cargo Council with a high-level comparison of the information required in the current ICR versus the new WCO version 3-based message (this has been done).**
- v. **Agencies wondered how the prime carrier airline can indicate on its ICR that a code sharer or freight forwarder will be submitting an ICR for its master air waybills. Airlines advised the "OCI" field of the FWB message can be used to capture such an indicator for transfer to the ICR message.**
- vi. **In discussion on the detail of the ICR message, agency reps advised that an ITR includes a field for the exporting flight number. Airline reps queried the necessity of this, given the risk assessment objective appears to be satisfied without this detail. Cargo is invariably booked on a "next available flight" basis, so it would not be known at the time the ITR is made within the ICR, and having to wait till it is known creates real logistical and compliance cost issues. Agencies advised that it's desirable to support cargo reconciliation, but**

after discussion, agreed that the airline code (e.g. NZ, SQ, AR) would suffice for this.

- vii. Airlines also advised that for trans-Tasman flights, submitting the ICR at least two hours before arrival can be difficult, and would like to see a timing differentiation based on zones e.g. 1.5 hours for trans-Tasman and Pacific flights, and four hours for other origins. Agency reps responded that 1.5 hours is a very short period for completing risk assessment, and that problems meeting the current two hour limit can be managed on a case by case basis, while ICRs for other origin flights seemed to generally be submitted well ahead of this limit, so there may be no need to extend it. However, the proposal will be considered.

3. International Transshipment Request (ITR)

- a. As signalled in previous consultation, this is a new message for consignments that arrive in NZ, but whose final destination is not NZ, and which need to be transferred to another aircraft or a ship without unpacking (sometimes called transfer cargo). ITRs will generally be submitted by carriers and freight forwarders.
- b. The purpose is to enable initial Customs and MAF risk assessment of the consignments prior to unloading, movement and subsequent loading aboard the export craft. This replaces Customs' current transshipment for export process, and the ITR message incorporates data required by MAF. Details of the current international transshipment process are set out in Appendix 1.
- c. The ITR message being developed is similar to the new ICR, with additional details required. These include codes for the import and export craft (whether air or sea), and the transport mode. The ITR must report cargo details at both the master and house air waybill level.

Consultation Summary:

- i. Airline reps were concerned that as seamless transfers from one aircraft to another come into this category, the need to lodge an ITR would have a serious effect on transfer times. Agency reps advised that the ITR can be requested within the carrier's ICR, so it should not affect seamless transfers. As per paragraph 2. i. above, the Air Cargo Council advised that airlines have to do this for the US and EU, and consider that Customs and MAF should mandate that airlines do so here, which will allow them to require freight forwarders to provide the information at the point of departure.
- ii. Freight forwarders confirmed that they would only be able to fulfil the house air waybill level requirement if they have a relationship with the export or import country's freight forwarder, and even then do not normally have access to the data.
- d. The question of terminology has also arisen. Some in the industry call cargo that is arriving on one craft for export on another "transit" cargo, while others call it "transshipment" cargo. Customs has historically used "transshipment" for such cargo, and has used the term "transit" for cargo remaining on board a craft while it is in NZ before continuing its journey. We understand other administrations call the latter "Freight Remaining On Board". We would like to be consistent with international practice, and asked for feedback on the prevailing practice.

Consultation Summary:

- i. Airlines advised these consignments are called "transfers"; while "transit" refers to cargo staying on board the arriving craft; and "transshipments" is the term for international consignments that are destined for NZ but are going

onto a domestic flight prior to final delivery here. For seafreight, these consignments are "international transshipments"; while "Freight Remaining on Board (FROB)" is the best term to use for cargo remaining on the arriving vessel; and "domestic transshipments" should be used for uncleared cargo moving within NZ - which is currently still referred to as "under bond" by the industry (but not by Customs!).

- ii. Agency reps undertook to recommend using the seafreight terminology as the basis for regulations, subject to any other feedback from industry. The Air Cargo Council noted the proposed terminology differs from ICAO rules – the Council did not object, but asked that the legislation explain how Customs uses the terms, versus what the airfreight industry uses. The wording of the associated amendment to the Customs and Excise Act and Regulations is still being drafted, and will be consulted on before finalisation.
- e. Customs and MAF advised we are currently reviewing how to manage "repacks" i.e. a consignment arriving in NZ for export to different destinations, and so requiring a repack approval. (The re-export of repacked imports should not be reported on an export entry/declaration, as it misrepresents them as NZ exports in trade statistics).

Consultation Summary:

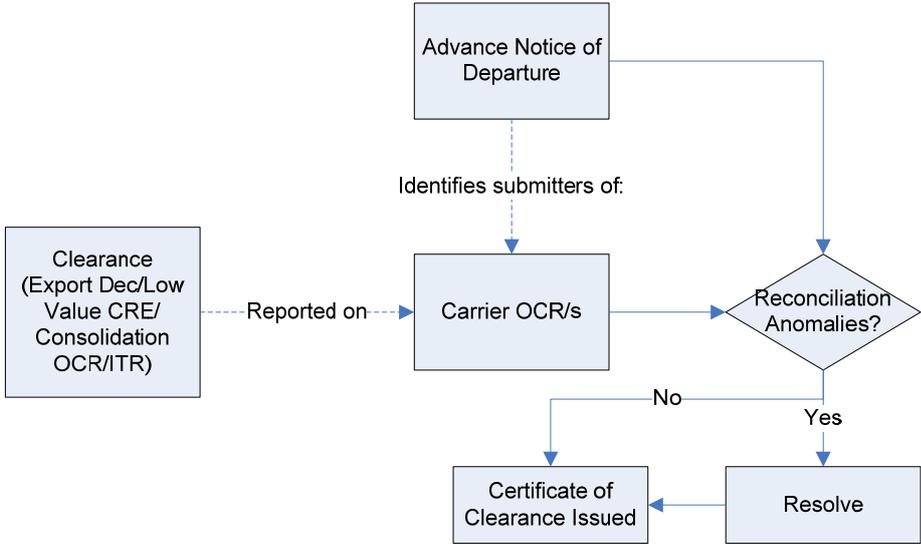
- i. The general consensus was that repacks should be dealt with via a DTR to get the whole consignment to the repack site, an ITR to gain approval to export those goods bound for overseas, and an import entry/declaration for those remaining in NZ. Customs and MAF will proceed on this basis, and a "repack" indicator will be added to the ICR/ITR/DTR message.

4. Domestic Transshipment Request (DTR)

- a. As signalled in previous consultation, this is a new process for goods whose final destination is NZ, and which need to be transferred from the place of arrival to a CCA/TF or other premises before final clearance, or transferred from one CCA/TF to another prior to being cleared. DTRs will generally be submitted by carriers and freight forwarders. Application of this process includes airfreight moving from the aircraft or the airline cargo store to the freight forwarder's premises, regardless of the distance.
- b. As covered in items 2.d. and 2.e. above, the movement can be requested as part of the carrier or freight forwarder ICR. If it is not, a separate DTR is required.
- c. The purpose is to enable initial Customs and MAF risk assessment of the consignment prior to movement, and to facilitate swift tracing of the location of cargo. As currently, release may be subject to conditions, such as inspection. This replaces Customs' current "Continuing" or "Single Permission for Removal Permit" and "paperless transshipments" processes, and incorporates the MAF BACCA as far as the information available at the time can satisfy. Details of the current domestic transshipment process are set out in Appendix 1.
- d. The DTR message being developed is similar to the new ICR, with additional details required. These include codes for the origin and destination premises, except that an importer's premises will likely be an ad hoc text insertion, as the agencies do not apply codes to all importers' premises. Customs and MAF are in the process of analysing our respective premises' codes to harmonise these as far as possible.
- e. The question of whether the receiving CCA/TF should be required to send a message to TSW confirming arrival of cargo arose in early consultation. This is highly desirable from a cargo tracing perspective, and also in order to schedule some MAF inspections that need to be conducted within a certain time, but would

involve an extra message transmission for the receiving CCA/TF. Customs and MAF sought feedback from the industry meetings, and concluded that our need to know when certain cargo has arrived or whether it has not arrived at all can be dealt with via reporting through other means. As a result, it's confirmed that the receiving CCA/TF will not be required to send a message to TSW confirming arrival of cargo.

Outward Airfreight Reporting



5. Advance Notice of Departure (AND)

- a. This is based on the existing Outward Report form and the renaming aligns with the imports process described above. The AND contains much the same data as the Outward Report, but will be based on the WCO3 data model. It will be used for reconciliation to Outward Cargo Reports (OCRs - see below), **and to generate a Certificate of Clearance as a PDF attachment if required (this is rare for aircraft).** The Certificate of Clearance is currently provided in hard copy.
- b. Receipt of the main AND document is required for all craft as it triggers the automated reconciliation process for ensuring all OCRs are later been submitted.
- c. For commercial scheduled flights, we are looking to transfer the AND submitted by airlines to Customs for API purposes, to TSW for Outward Cargo Report reconciliation purposes, as no additional particulars are currently required other than the number of cargo reports that will be lodged, which we are working through. Where no API has been lodged, an AND will need to be submitted.

Consultation Summary:

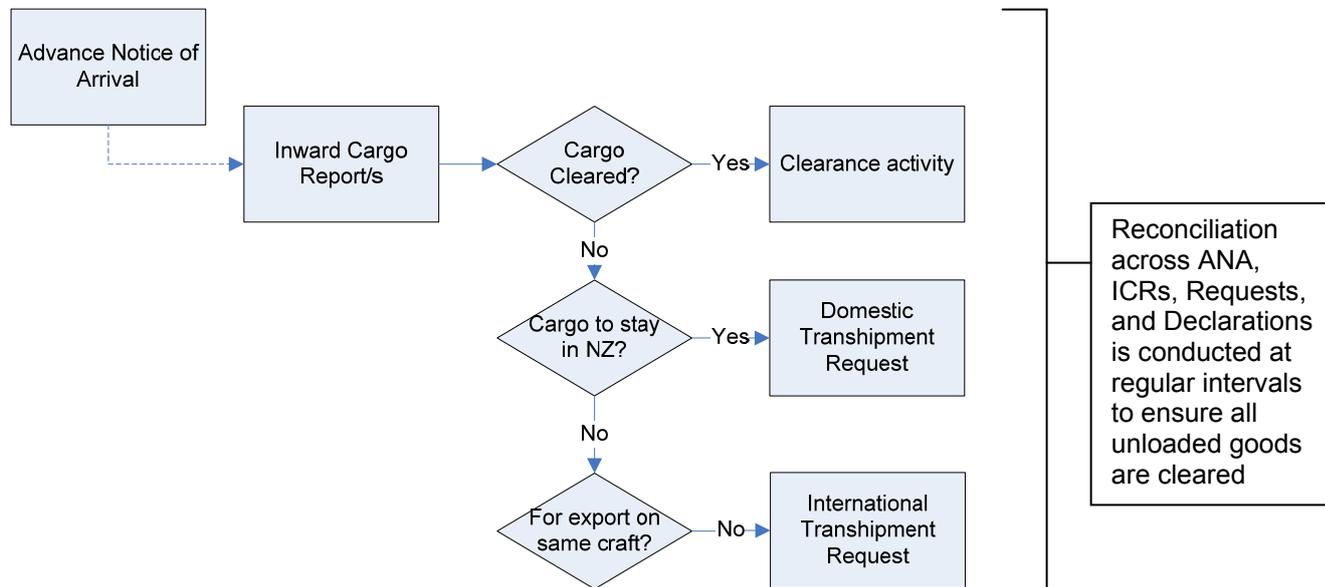
- i. The use of API to satisfy the AND requirement for aircraft is confirmed.

6. Outward Cargo Report (OCR – export reconciliation)

- a. There is little change to the content of this message, other than it will be based on the WCO3 data model.
- b. An OCR will continue to be required to be submitted by the airline for each departing craft or flight number within two hours of departure from New Zealand, to ensure all shipments were cleared by Customs prior to loading.
- c. An OCR will also continue to be required to be submitted by the freight forwarder or express courier for each export consolidation to ensure all consignments within it have been cleared by Customs before loading.

SHIPPING LINES, SHIPPING AGENTS, FREIGHT FORWARDERS AND PORT COMPANIES

Inward Seafreight Reporting



7. Advance Notice of Arrival (ANA)

- a. Submitted by the person in charge of a craft, or the operator/owner or their agent. The purpose is for initial advanced risk assessment of the craft, crew, passengers and cargo (the latter reported on an Inward Cargo Report – see below) by Customs, MAF, Maritime NZ and Ministry of Health (MOH). The objective is to determine whether the craft can berth and crew and passengers can land, and any inspection or other action required.
- b. Receipt of the main ANA document is required for all craft as it triggers the automated reconciliation process for ensuring all Inward Cargo Reports have been submitted.
- c. For commercial vessels, we are looking for the ANA to include the few additional particulars/attachments currently required in the Inward Report, so that the Inward Report as a separate, additional document is not required.
- d. The additional particulars/attachments (displacement, crew declarations, controlled drug/firearm list) will be required to be provided in advance with the remainder of the ANA particulars/attachments.

Consultation Summary:

- i. The foregoing points did not raise any objection.
- e. The default response to an ANA lodgement will be along the lines of “Accepted – vessel may proceed unless otherwise advised”.
- f. We are developing a message for the new ANA based on the WCO3 data model. The new process means the current fax and email submission process will be discontinued, and shipping agents will submit the ANA online via the TSW website.

Consultation Summary:

- i. Agents were concerned about having to enter into the TSW website facility information emailed from the ship, causing re-keying of a document for an

already time-constrained industry. While JBMS reps advised that agents will be able to pre-prepare and save a number of templates that might only require a few field updates for a given ship, so this may not be the imposition agents' fear, agents advised there is a high incidence of first-time tramper vessels, meaning a template cannot be reused to reduce the keying effort. Customs and MAF would like agents to trial the online screens when TSW is available and we will monitor if this is still an issue before any decision is made on whether to mandate the new message as is, or provide for a csv (spreadsheet) file upload.

- ii. There was also a concern that the new ANA message would require a lot more information, which would mean a lot more input keying. JBMS reps assured agents that the core ANA data is little more than required on the current form, with other information still being provided as attachments e.g. crew list; ballast declaration; ports of call history. JBMS reps undertook to show agents the screens when they are developed to see if the concerns will be resolved.
- iii. JBMS reps also noted advice that colours and logos in attachment templates need to be kept to the minimum necessary due to file size limit issues with emails from ships.
- g. The ANA may be provided by the person in charge, or the owner or operator, or their agent, while an Inward Report must be delivered by the person in charge or the owner and verified by declaration. We sought feedback on whether an ANA should contain a declaration about the truth and correctness of the particulars provided.

Consultation Summary:

- i. Agency reps noted feedback that there are already sufficient accountabilities in legislation, and there didn't seem much to be more to be achieved by a declaration. As a result, such a declaration will not be added to the ANA.
- h. In regard to updates of the ANA information, Customs, MAF and Maritime NZ only require updates for changes. The Ministry of Health (MoH) requires an update no later than 12 hours before arrival, regardless of whether there is a change.

Consultation Summary:

- i. While this did not raise any objection in itself, agency reps passed onto the Ministry of Health the shipping industry's concern that port health officers do not work 24 hours a day, so the original ANA advice and 12-hour update is often going to an unmanned office. The subsequent delays cause ships to be held up from berthing, with consequential costs and inefficiencies. Ministry of Health reps advised the update is a legislative requirement, but they would liaise with Port Health Officers over the response issues. Feedback at the February meeting was that there seemed to have been some improvement.

8. Inward Cargo Report (ICR)

- a. An ICR will be required at the carrier, space-sharer and consolidation/FAK/LCL level.
- b. As per the current process, there may be one or more carrier/space-sharer level ICRs for a craft, submitted by the person in charge of a craft, or the operator/owner of the craft or the space-sharing carrier, or their agent. ICRs form part of the ANA, so as currently, are required to be lodged not less than 48 hours before the estimated time of arrival of the vessel in NZ.

Consultation Summary:

- i. A question arose as to whether the ANA had to be submitted before the carrier ICR, and the carrier ICR before any consolidator's ICR, ITR or DTR – so that

everything will be held if the preceding lodgement is not made. The answer is no – any of the lodgements can be submitted in any order, and the agencies encourage the earliest possible advance submission of any of these to assist advance risk assessment. An electronic reconciliation process undertaken by the agencies will ensure that what was landed in NZ (whether for delivery here for international transshipment), was reported to the agencies as required.

- c. We are developing a message for the new ICR based on the WCO3 data model. This provides for much of the data relevant for Customs and biosecurity risk assessment (incorporating MAF BACCA data as far as the information available at the time can satisfy), including the option to provide entity and goods codes e.g. supplier, importer, tariff classification; GS1 product code or classification. The more complete and high-quality the data provided, the greater the opportunity for facilitation and advance advice of any border requirements.
- d. To enhance understanding of the risk posed by the craft, Customs and MAF would like “freight remaining on board” (or “FROB” - sometimes referred to as transit cargo) to be included in the carrier’s ICR, and for all “cargo remaining on board” and international transshipment cargo (sometimes called “transfer cargo”) to be reported at house bill level by the carrier.

Consultation Summary:

- i. Reporting freight remaining on board raised a number of concerns. Some shipping lines do not currently have access to this information in their systems, while some do – it depends on the relationship with the head office. Shipping agents are unlikely to get such access, meaning the lines they represent would need to lodge the information. For both lines and agents, there is a further problem providing more than master bill information, as house-bill level information (i.e. ultimate consignor and consignee and goods description) is not held e.g. lines can provide commodity codes, but not necessarily goods descriptions, and not ultimate consignor and consignee. At the first consultation meeting, lines and agents undertook to identify what data they can access locally and what their head offices could provide if required, but the results were patchy. **At the February 2012 meeting, Customs and MAF undertook to review the level of risk and other options before pursuing this requirement any further.**
- ii. **At the February 2012 consultation meeting, agency reps also sought feedback from ports on how MAF can be advised of FROB containers that need to be temporarily placed on wharf for loading purposes (“DLR” cargo). While industry reps advised the BAPLIE file provides some information that could help MAF identify containers that would be a risk if they were subject to DLR, it won’t include all risk assessment information, such as the previous ports a container has visited. It was noted that all containers, whether NZ-destined or subject to DLR, could be cross-contaminated through proximity to others on board, so targeting the specific risk seems unachievable. Again, MAF undertook to review the level of risk and other options before pursuing this question any further.**
- e. The ICR at carrier level will include the ability to submit an International Transshipment Request (ITR) or Domestic Transshipment Request (DTR) for advance approval to move the relevant consignments to a Customs Controlled Area/Transitional Facility (CCA/TF) awaiting export on another craft (whether air or sea), or awaiting import clearance. If such a request is not made in the carrier ICR, a separate ITR or DTR will need to be submitted (see items 9 and 10 below).

Consultation Summary:

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- i. At the February 2012 meeting, the detail of the ITR information was discussed, with agency reps explaining that the Customs code for the NZ port of export's Customs Controlled Area (CCA) will need to be specified so they can receive the electronic authorisation to load that will be generated by the ITR. Industry reps were concerned about how these codes could be introduced to off-shore shipping lines' systems. Customs and MAF undertook to publish these codes online, and shipping lines will consider how to achieve adoption in the international industry. The same issue applies to DTR codes as discussed in paragraph 10.2.ii. below.
 - f. As signalled in 2009 consultation, there will be a new mandatory requirement for an ICR to be submitted for every consolidation shipment intended for delivery or repack in New Zealand, by the responsible freight forwarder or their agent. This will report the individual consignment level (house bill) details, and the same submission deadline as the carrier ICR will apply i.e. not less than 48 hours before the estimated time of arrival of the vessel in NZ.

Consultation Summary:

- i. Concern was raised about confidentiality of ICR information between consolidators sharing an FAK container. Agency reps assured industry reps that one ICR per FAK consignment is not expected – the prime consignee freight forwarder will need to identify on their ICR how many are to be lodged for the shipment, and who the submitters will be.
- ii. A freight forwarder advised that some consolidation shipments comprise further consolidations, meaning multiple consolidator ICRs are involved. Concern was raised that movement of a container off wharf to the prime consolidator's premises could be delayed because of one tardy consolidator not submitting their report, so all are penalised. Agency reps confirmed all reports would need to be received to enable risk-assessment of the container and movement approval. Agency reps undertook to work through how we can encourage timely submission – a suggestion from the floor being to have a penalty for late submission. The requirement for a penalty is under action by the JBMS Policy/Legal team.
- iii. Agency reps acknowledged the viability of the proposed process wasn't clear, but pointed out that we have 18 months from TSW go live to mandating of the new messages to trial it, monitor impacts and resolve difficulties, which industry reps accepted.
- g. Similarly, within this consolidation-level ICR, the submitting freight forwarder will be able to include an International Transshipment Request (ITR) or Domestic Transshipment Request (DTR) to move the consolidation to a Customs Controlled Area/Transitional Facility (CCA/TF) awaiting export on another craft (whether air or sea), or awaiting import clearance, if such a request has not already been made on the carrier ICR. If this request is not made in the carrier or consolidator ICR, a separate ITR or DTR will need to be submitted to move the consignment (see items 9 and 10 below).

9. International Transshipment Request (ITR)

- a. As signalled in previous consultation, this is a new message for shipments that arrive in NZ, but whose final destination is not NZ, and which need to be transferred to another vessel/aircraft without unpacking (sometimes called transshipment cargo). ITRs will generally be submitted by carriers and freight forwarders.
- b. The purpose is to enable initial Customs and MAF risk assessment of the container and/or goods prior to unloading, movement and subsequent loading aboard the

export craft. This replaces Customs' current transshipment for export process, and incorporates data required by MAF.

- c. The ITR message being developed is similar to the new ICR, with additional details required. These include codes for the import and export craft, and the transport mode.
- d. The issue of the level of detail to be provided for consolidation/FAK/LCL shipments has arisen. In an ideal world, this would be at detailed house bill level, as assessment of the security and biosecurity risk cannot be fully effective without the detail.

Consultation Summary:

- i. This involves the same issues as identified in paragraph 8.d.i. above, but it's possible the outbound carrier could know the details as they need to report them to the importing country's administration.
- ii. Freight forwarders confirmed that they would only be able to fulfil a requirement to report house bill details for international transshipments if they have a relationship with the export or import country's freight forwarder, and even then do not normally have access to the data.
- iii. At the February meeting, Customs and MAF advised the issue for agencies is the biosecurity and maritime security risk of the movement, plus that in many cases the onward bill of lading is cut in NZ, which presents a reputational risk from other countries' perception that any problem goods are of NZ origin. Given the feedback on difficulties with this proposal, Customs and MAF will not insist on this requirement right now, but we will pursue this with industry over time as international expectations for such data evolve. This includes the potential that rather than being a blanket requirement that FROB and international transshipment cargo be reported as part of the ICR, there be a requirement to report this cargo within a specified time if requested, to cover situations such as the MV Rena grounding.
- e. The question of terminology has also arisen. Some in the industry call cargo that is arriving on one craft for export on another "transit" cargo, while others call it "transshipment" cargo. Customs has historically used "transshipment" for such cargo, and has used the term "transit" for cargo remaining on board a vessel while it is in NZ before continuing its journey. We understand other administrations call the latter "Freight Remaining On Board". We would like to be consistent with international practice, and requested feedback on the prevailing definition of these terms in the NZ industry.

Consultation Summary:

- i. Following some variance in views, the general consensus appeared to be that these consignments are "international transshipments"; while "Freight Remaining on Board (FROB)" is the best term to use for cargo remaining on the arriving vessel; and "domestic transshipments" should be used for uncleared cargo moving within NZ - which is currently still referred to as "under bond" by the industry (but not by Customs!).
- ii. Agency reps undertook to recommend using this result as the basis for regulations. The wording of the associated amendment to the Customs and Excise Act and Regulations is now being drafted.
- f. Customs and MAF advised we are currently reviewing how to manage "repacks" i.e. a consignment arriving in NZ for export to different destinations, and so requiring a repack approval. (The re-export of repacked imports should not be

reported on an export entry/declaration, as it misrepresents them as NZ exports in trade statistics).

Consultation Summary:

- i. The general consensus was that repacks should be dealt with via a DTR to get the whole consignment to the repack site, an ITR to gain approval to export those goods bound for overseas, and an import entry/declaration for those remaining in NZ. Customs and MAF will proceed on this basis, and a "repack" indicator will be added to the ICR/ITR/DTR message.

10. Domestic Transshipment Request (DTR)

- a. As signalled in previous consultation, this is a new message for goods whose final destination is NZ, and which need to be transferred from the place of arrival to a CCA/TF or other premises before final clearance, or transferred from one CCA/TF to another prior to being cleared. DTRs will generally be submitted by carriers and freight forwarders.

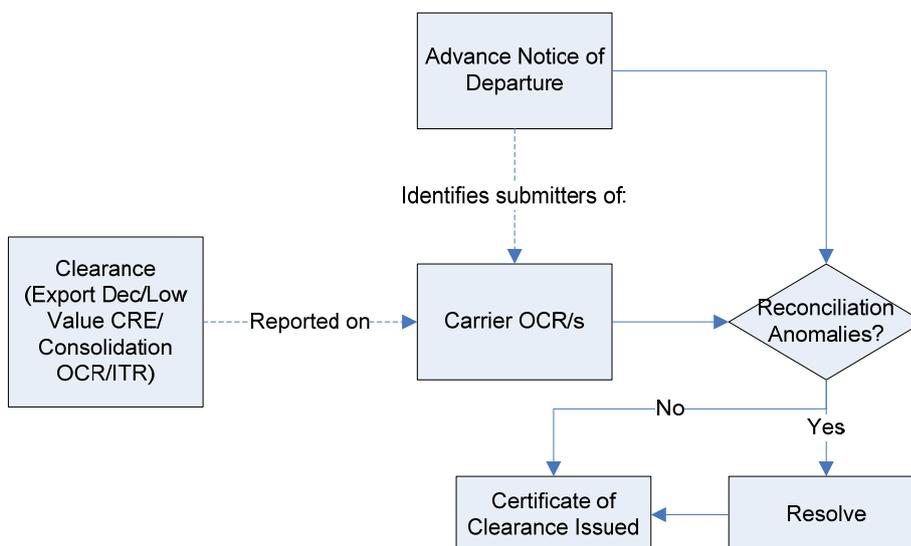
Consultation Summary:

- i. The first consultation meeting was concerned about whether this would apply to cargo moving to inland ports, due to delays to rail movements if the DTR is not able to be submitted or approval not received in time. Agency reps stressed that the risks of movements to inland ports - biosecurity in particular - are a concern, and suggested that the movements should be able to be reported on the carrier's and/or consolidator's ICR, so should be lodged at least 48 hours prior to arrival and processed well in time. This was acknowledged by industry reps.
- ii. At the February 2012 meeting, Customs and MAF reiterated we need to know in advance that cargo is destined for an inland port, and this is not happening now. We sought industry feedback on what is a viable solution for reporting these movements, noting the need to preserve reporting of the actual port of discharge. A combination of the UNLOC code and Customs and MAF premises code in the "location" data element of the carrier or consolidator's ICR (where the DTR is made at that level) was discussed in detail. JBMS reps undertook to draft the ICR Message Implementation Guidelines setting out how we see it working, and provide these for feedback.
- iii. Industry reps raised the issue that the exact inland port destination (road head or rail head) was not always known, but acknowledged it generally was, and that amendments could be made to the ICR/DTR in NZ to update this information. Industry reps were also concerned about achieving adoption of the Customs and MAF premises codes by their overseas offices. Agency reps observed that within reason, industry can make changes when members put their minds to it, as occurred with the "no CEDO, no load" change to exports in 2004.
- iv. Agency reps acknowledged the viability of the proposed process wasn't clear, but pointed out that we have 18 months from TSW go live to mandating of the new messages to trial it, monitor impacts and resolve difficulties, which industry reps accepted.
- v. Agency reps expected that the introduction of the DTR message would enable the removal of CCA Procedure Statement provisions that require the CCA releasing a domestic transshipment to gain advice of receipt from the

destination CCA. This will be confirmed once the new process is introduced and proven as viable.

- b. As covered in paragraphs 8e and 8g above, the movement can be requested as part of the carrier or consolidator ICR. If it is not, a separate DTR is required.
- c. The purpose is to enable initial Customs and MAF risk assessment of the container and/or goods prior to movement, and to facilitate swift tracing of the location of cargo when necessary. As currently, release may be subject to conditions, such as on-wharf container wash. This replaces Customs' current "Continuing" or "Single Permission for Removal Permit" and "paperless transshipments" processes, and incorporates the MAF BACCA as far as the information available at the time can satisfy.
- d. The DTR message being developed is similar to the new ICR, with additional details required. These include codes for the origin and destination premises, except that an importer's premises will likely be an ad hoc text insertion, as the agencies do not apply codes to all importers' premises. Customs and MAF are in the process of analysing our respective premises' codes to harmonise these as far as possible.
- e. The question of whether the receiving CCA/TF should be required to send a message to TSW confirming arrival of cargo arose in early consultation. This is highly desirable from a cargo tracing perspective, and also in order to schedule some MAF inspections that need to be conducted within a certain time, but would involve an extra message transmission for the receiving CCA/TF. Customs and MAF sought feedback from the industry meetings, and concluded that our need to know when certain cargo has arrived or whether it has not arrived at all can be dealt with via reporting through other means. As a result, it's confirmed that the receiving CCA/TF will not be required to send a message to TSW confirming arrival of cargo.

Outward Seafreight Reporting



11. Advance Notice of Departure (AND)

- a. This is a new message based on the existing hard copy Outward Report form. The renaming aligns with the imports process described above. The AND contains much the same data as the current hard copy Outward Report, but will be based

on the WCO3 data model. It will be used for reconciliation to Outward Cargo Reports (OCRs - see below), and to generate a Certificate of Clearance as a PDF attachment. The Certificate of Clearance is currently provided in hard copy.

Consultation Summary:

- i. Agency reps sought feedback on whether provision of the Certificate of Clearance as a PDF attachment would be a problem for the vessel's arrival in any next port of call. Industry reps advised it would not, so Customs will proceed with providing it in this way.
- b. Receipt of the main AND document is required for all craft as it triggers the automated reconciliation process for ensuring all OCRs have been submitted.
- c. The new process means the current fax and email submission process will be discontinued – it will be submitted online via the web channel.
- d. Currently, the Outward Report is required to be submitted by the person in charge of the craft. Customs and MAF sought feedback on whether this should be extended to the owner or operator or their agent, as for the ANA. There was clear industry support for this, and it is being included in a proposed amendment to the Customs and Excise Act.

12. Outward Cargo Report (OCR – export reconciliation)

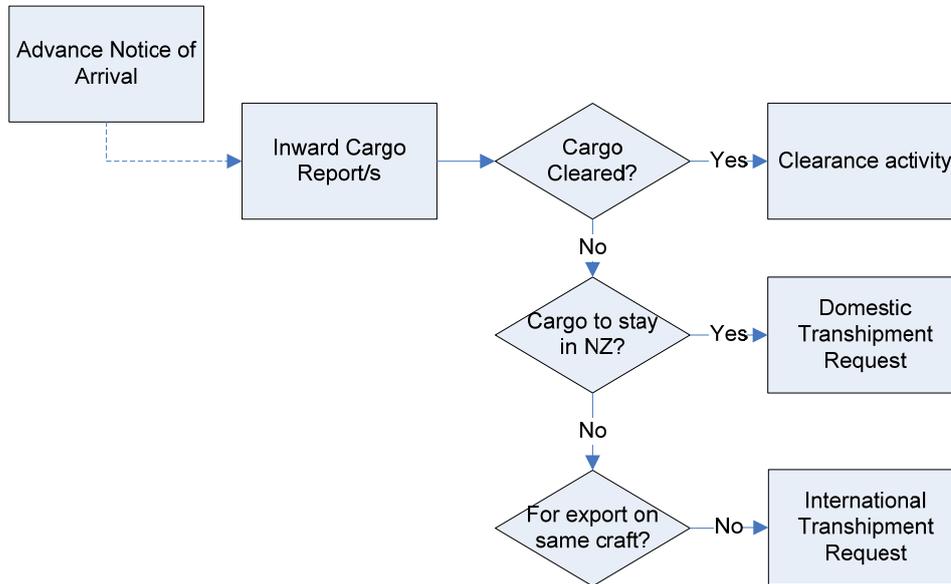
- a. There is little change to the content of this message, other than it will be based on the WCO3 data model. An OCR will continue to be required for each export consolidation to ensure all consignments within it have been cleared by Customs prior to loading, and for each craft to ensure all shipments have been cleared by Customs.
- b. However, seafreight carrier OCRs are currently submitted after departure of the vessel, which compromises the purpose of the reconciliation process. Customs and MAF sought feedback from industry on the viability of requiring OCRs to be submitted prior to vessel departure. Then, if an OCR stated as to be submitted on the AND is not received, or any such OCR contains reconciliation anomalies, the Certificate of Clearance would be withheld until a Customs officer is either satisfied they are resolved, or that the risk is acceptable.

Consultation Summary:

- i. There was clear consensus that it is generally not possible to have the OCRs compiled and submitted prior to vessel departure. Factors include loading working up to tide changes; the completion process is not immediate upon loading as some contact with lines and freight forwarders is often required before submission; and some ports/lines do not fully automate the OCR compilation from the load process.
- ii. Agency reps accepted the current OCR reporting time of within 24 hour after departure will continue, but explained a range of treatments might need to be applied to ensure NZ's reputation with overseas administrations such as the US was not compromised as a result of reconciliation anomalies.

FREIGHT FORWARDERS, CUSTOMS BROKERS, IMPORTERS AND EXPORTERS

Inward Cargo Clearance



13. Inward Consolidation Reports

- a. Freight forwarders dealing with consolidations please refer to section 2 (airfreight) and section 8 (seafreight) above for new requirements.

14. International and Domestic Transhipment Requests

- a. Freight forwarders dealing with international and domestic transhipments (sometimes called "movements under bond") please refer to sections 3 and 4 (airfreight) and sections 9 and 10 (seafreight) above for new requirements.

15. Low Value Write-offs

- a. Write-off of low value consignments for which total duty and GST payable falls under the \$60 de minimus (generally airfreight) will continue to be able to be requested via the ICR (sometimes called an Electronic Cargo Information report, or ECI).
- b. We are developing a message for the new ICR based on the WCO3 data model. This provides for much of the data relevant for Customs and biosecurity risk assessment (incorporating MAF BACCA data as far as the information available at the time can satisfy), including the option to provide entity and goods codes e.g. supplier, importer, tariff classification; GS1 product code or classification. The more complete and high-quality the data provided, the greater the opportunity for facilitation and advance advice of any border requirements.

Consultation Summary:

- i. Agency reps stressed that while the write-off ICR message enables inclusion of MAF BACCA data, if additional information is required in order for MAF to adequately risk assess the consignment, this will need to be provided by way of an Import Declaration message (see below), as this is the message that replaces the current full eBACCA.

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- c. The submitter will be required to make a positive affirmation against a consignment on the ICR that write-off is requested.

Consultation Summary:

- i. An express courier raised concern about the effort required to identify the revenue payable on goods within a consignment that is write-off marginal, which is time consuming and out of scale to the revenue value involved. They suggested replacing the current duty and GST de minimus with a consignment value threshold would be a better approach.
- ii. However, Customs has already assessed the concept of a threshold to replace the de minimus following an earlier industry proposal, which was declined. Customs does not consider this new positive indication requirement creates grounds for revisiting this decision. The requirement for the freight forwarder to assess the validity of each write-off consignment is absolutely valid as it's about ensuring any prohibited goods controls (such as those related to biosecurity, food safety, weapons and medicines) are satisfied, not just to ensure payment of duty and GST due. An industry focus on automating the write-off of low value goods as far as possible without consideration of the risk elements of a consignment is something we want to work with you to change.
- iii. There was a query as to whether declarant PINs would be required to lodge an ICR containing write-off requests. Agency reps recognise the reality that for some high transaction volume freight forwarders and express couriers, no individual declarant in fact creates the submission. However, we need to ensure reliable corporate culpability for false or erroneous data. **As it is technically difficult to allow for exceptions to the PIN requirement, it is likely that such ICR write-off messages will need to contain a PIN. However, where a client satisfies Customs and MAF that the submission is always system-generated, we will issue and accept an "organisational declarant" PIN rather than an individual one. The JBMS Policy/Legal team that is drafting legislative amendments to support the TSW implementation is working on this.**

16. Import Declaration

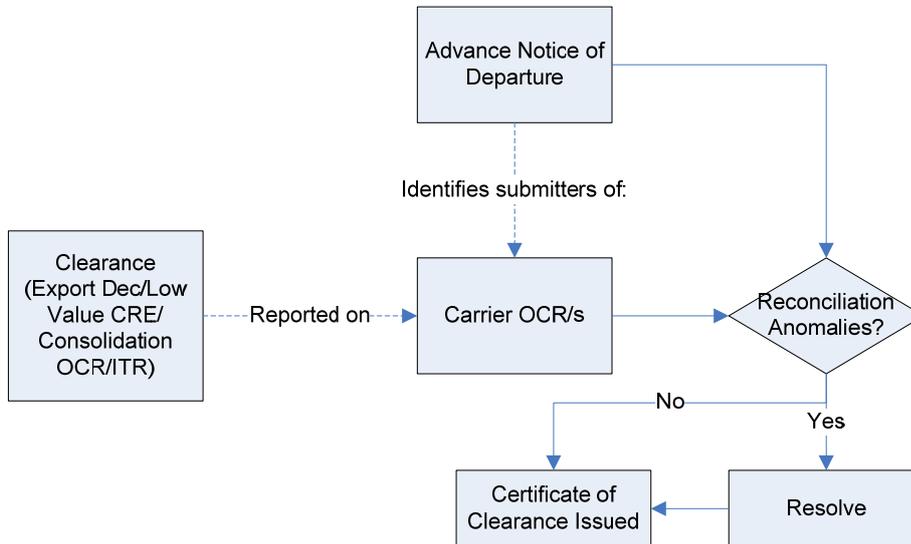
- a. We are developing a message for the new Import Declaration based on the WCO3 data model, replacing the current Customs Import Entry and MAF BACCA. This also provides for additional data relevant for Customs and biosecurity risk assessment, again including the option to provide further entity and goods codes e.g. grower and packer identifiers; GS1 product code or classification.

Consultation Summary:

- i. Agency reps asked about the viability, for seafreight, of requiring that a detail line specify which shipping container the goods are packed in. When alerts on particular goods are triggered, this would allow the response message to identify which containers are held and which can be released. Industry reps advised that while this would be good outcome, they rarely receive packing lists that enable this to be specified, and that even then they are in hard copy so it would mean a lot of extra work on preparation of the import declaration. The preference was to make this optional so that the benefit can be achieved if the information is readily available. Customs and MAF confirmed specification of the container number for the goods on each detail line will be optional.
- ii. **At the February 2012 consultation meetings, Customs advised we are looking to relax the time limit on when an import entry can be lodged – the current limit being no earlier than 24 hours before arrival for airfreight, and five days for seafreight. This is in acknowledgment of Customs and MAF's desire to risk**

assess cargo destined for NZ as early as possible, so that consignments posing a risk can be treated off shore or their carriage prevented – as set out in our new joint Trade Principles. Customs is reviewing the implications for its border management responsibilities to ensure its objectives can still be met. A final decision on this will be advised asap.

Outward Cargo Clearance



17. Cargo Report Export (CRE)

- There is little change to the content of this message, other than it will be based on the WCO3 data model.
- Clearance of export consignments whose Customs value is less than \$1,000, or that are exempt from the Export Entry requirement, will continue to be able to be requested via the CRE (sometimes called an Electronic Cargo Information report, or ECI). The submitter will be required to make a positive affirmation against a consignment on the CRE that clearance is requested.

Consultation Summary:

- A freight forwarder advised that the \$1,000 value threshold before an export entry is required is being abused in some instances viz. consignments documented for shipment to one consignee off shore (an agent), but for subsequent breakdown into individual consignments for delivery to multiple consignees, are being cleared as exempt entry when the total consignment is valued at over \$1,000. This breaches Customs regulations and undermines trade statistics reporting. Customs reps undertook to follow this up.

18. Export Declaration

- We are developing a message for the new Export Declaration based on the WCO3 data model, replacing the current Customs Export Entry.
- For this first tranche of the JBMS development, the new Export Declaration will not include data required by MAF for export certification of animal and plant products, which clients will need to continue to submit to MAF's E-cert systems. Customs and MAF have a separate line of work under way to look at developing a solution to capture MAF animal products data in the new Export Declaration and transfer it to the AP E-cert system export. If viable, it is expected to be available for

messaging clients in late 2013. A solution for web channel clients and plant export data is being assessed for inclusion in tranche 2 of the JBMS development, which is subject to Government approval of a further business case.

19. Outward Cargo Report (OCR) for Consolidation Shipments (export reconciliation)

- a. There is little change to the content of this message, other than it will be based on the WCO3 data model. An OCR will continue to be required for each export consolidation to ensure all consignments within it have been cleared by Customs prior to loading.

TSW AND MAF FOOD IMPORTS

20. Information in the Import Declaration

- a. The introduction of JBMS and the TSW will enable MAF to streamline the processes around clearance of food imports. To be able to make best use of the upcoming changes, food importers (or their agents) will need to be registered with Trade Single Window and use the new WCO3 Import Declaration message.
- b. By using TSW and the new Import Declaration message, food importers will be able to submit all imported food consignment data in a single transmission and receive electronic clearance and status updates. This means that importers no longer have to fill out MAF's current paper form for food clearance (Single Use Permit Application).
- c. The new Import Declaration message will include provision for key data such as the entities involved in the transaction, what the food is, where it comes from, when it is arriving and the quantity of the food. Importers will also be able to link import consignments with parties involved in the supply chain, to help inform risk assessment.
- d. Where the food is of no interest to government agencies, food importers will no longer be waiting for Imported Food Permits. Instead, where accurate and complete information is provided, MAF expects to be able to process the Import Declaration and provide electronic clearance following risk assessment.

21. High risk foods

- a. In some cases some mitigation of risk may be required before food can be cleared. Via TSW, food importers will be able to electronically submit supporting information currently required for high risk Food Clearances. This includes things such as the invoice for the consignment, the bill of lading or air way bill, the recognised assurances or certification, and even the ingredient list or product specification.
- b. The clearance of high risk foods will be managed via TSW too. This will occur when a Food Act Officer has been satisfied by the importer that the food complies with the Food Act.
- c. High risk foods include things such as beef, raw milk and soft cheese, crustaceans, bi-valve molluscan shellfish, peanuts and peanut butter. More details on high risk foods are available the Food Safety website.

22. Importer registration

- a. Currently Food Importers are required to be listed with MAF. Once TSW is live, importers will need to register with TSW, and keep their own information up to date. This information will then be used by MAF to manage its list of Food Importers.
- b. Food Importers must either be resident in New Zealand, or use an Agent or other importer who is resident here.

APPENDIX 1: EXISTING BUSINESS PROCESSES FOR TRANSHIPMENTS

A. International Transhipments

NB: Some in the industry call this “transhipment” cargo. We are referring to goods that arrive in New Zealand en route to another country, and are transferred to a different vessel or aircraft (either at the same port/airport or at a different port/airport) for export, without being cleared for delivery in New Zealand.

Existing business process:

MAF:

- There is a combination of manual manifest or air waybill screening and on-wharf/airport surveillance/inspection activity to determine the risk status of such consignments.
- If the goods are being offloaded and remaining in the airport environs or on a wharf to be transferred onto another craft, then no BACC application is required as the relevant airline/port system will maintain security of the goods.
- Otherwise, for risk goods, a BACC with specific conditions that may involve inspection prior to the goods leaving the cargo store/wharf is issued. Evidence of re-export is also required.
- **Note:** the live animals process is different.

Customs:

- An export delivery order is required to authorise loading onto the export craft. Where the transhipment requirements are already known and a consignment is tagged as such on the importing craft’s Inward Cargo Report (ICR), Customs can process relevant fields and electronically authorise loading for transhipment.
- However, as the current ICR format is not suited to this (there is no field for the export craft or export BoL/awb number), a freight forwarder often submits a specific Export ECI report in order to gain an export delivery order.
- Where the transhipment air waybill for export from New Zealand is cut in New Zealand, a specific Export ECI report is required to be submitted in order to gain an export delivery order.
- Neither facility is sufficient for border management objectives.

B. Domestic Transhipments

NB: In regard to Customs’ requirements, this has historically been referred to as an “under bond movement” or “domestic transhipment” or “transhipment for removal within NZ”. MAF sometimes calls it a “transfer”. We are referring to goods that arrive in New Zealand and are intended for final delivery in New Zealand, but need to be transferred from the place of arrival to a CCA/Transitional Facility or importer’s premises, or transferred from one CCA/TF to another, before being cleared for “home consumption” e.g. an LCL container moving from a port to a freight forwarder’s CCA for de-consolidation; or to a TF for treatment.

Existing business process:

MAF:

- Again, there is a combination of manual manifest and air waybill screening and on-wharf/airport surveillance/inspection activity to determine the risk status of such consignments.

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- For seafreight FCLs, CusMod alerts on ECIs and Import Entries trigger transmission of data required by MAF to Quantum via the ESCRIP interface.
 - For any seafreight considered a risk (including FCLs or their contents for which ESCRIP data has been received), MAF information is provided by carriers/freight forwarders/importers submitting a BACCA via fax or through ECN's eBACCA facility. Documentation such as container treatment certificates can be attached.
 - For airfreight, where such consignments are moving to a freight forwarder's CCA/TF within the same airport environs, this generally occurs before or while MAF air waybill screening is taking place - it would be unusual for MAF to stop goods moving this short distance. Where consignments considered a risk are moving to a CCA outside the airport environs, a BACCA needs to be lodged as above.
 - **Note:** the process for live animals is different.

Customs:

- Customs does not currently require a lodgement for such movements. Instead, a hard copy "Continuing Permission for Removal Permit" is in place for most parties to authorise movements from the place of arrival to CCAs within the same Customs port district. Where movement is to other than a CCA (such as an importer's premises), a hard copy "Single Permission for Removal Permit" has to be authorised by a Customs officer.
- For movements between CCAs located in different regions, most CCAs are approved for "Paperless Transshipments" whereby their Procedure Statements require them to keep records of inward and outward movements for audit purposes.
- This manual, non-data captured process does not satisfy border management objectives.