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Green is Gold: Creating a Gold Standard AEO Program through Green Initiatives

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This policy report examines the feasibility of extending Authorized Economic Operator (AEO) programs to include green trade practices. AEOs are supply chain security programs that play a vital role in enhancing the security and efficiency of international trade. A significant threat to global security is climate change. Considering how Customs administrations worldwide can actively contribute to efforts on this pressing issue is crucial. This policy report addresses the nexus of security, trade, and climate change to recommend how AEOs can contribute to climate change mitigation and adaptation principles. Employing a survey distributed to Trusted Traders within the Australian Border Force's AEO, the authors find that incorporating green trade principles into the existing AEO and within the SAFE Framework is an achievable option. Integrating green trade practices and principles into AEO programs can significantly advance Customs' efforts on climate change.

Introduction

Climate change and environmental degradation are at the forefront of international and domestic politics and public discourse. Yet, little empirical work has been done on Customs¹ administrations' adaptive capacity to respond and adapt to climate change. It is this intersection that continues to vex Customs and supranational agencies, with the question of how the management of borders can adapt to and contribute to mitigating climate change risks. There are, however, mechanisms already employed by Customs administrations that can, and should, contribute to climate change mitigation efforts and adaptation. One such mechanism is the Authorized Economic Operator

(AEO) program. In this article, we contend that AEO programs can be adapted to develop and sustain green trade practices to meet that end. To that end, we will demonstrate how green trade practices can contribute to both climate change mitigation and adaptation efforts.

Following the World Customs Organization (WCO) Green Customs Global Conference in 2022, Customs administrations were tasked to consider whether an AEO program could be adapted to develop and sustain green trade practices. The green trade practices can range from emissions reduction at the source (i.e.,

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mitigation) to partnerships with multiple suppliers in different geographic locations to reduce logistical disruption (i.e., adaptation). AEO programs are informed by the WCO SAFE Framework of Standards to secure and facilitate global trade (hereafter referred to as the "SAFE Framework"). The premise of the SAFE Framework is to support the facilitation of legitimate trade, incentivising accredited entities with trade facilitation benefits. While the SAFE Framework focuses on providing increased security to the global supply chain, Customs administrations are exploring whether the framework can integrate climate-focused recommendations. This exploration has centred on incentivising green trade practices by providing benefits for members who satisfy 'green' standards and encouraging green innovation. The threshold or framework for assessing the green trade practices of traders has not been explored beyond policy debate relating to the dichotomy of supply chain security and the climate agenda.

This policy proposal is premised on primary data collected from traders within the Australian Border Force (ABF) AEO program Australian Trusted Trader (ATT), along with archival and industry directives. The study undertaken by the authors examines the feasibility of integrating 'green' principles in AEOs, specifically to facilitate Customs' adaptation to climate change and contribute to mitigation. Through such climate action, Customs administrations able to host AEOs are better positioned to deal with our rapidly changing climate and lead the way in climate-friendly trade practices. This article begins with a background to the climate security at hand and then explores the links between climate security and supply chain security. It then discusses the SAFE Framework. The article then presents and discusses data collected from traders in the ATT program, making a case for the feasibility of this proposal. It concludes with policy options and recommendations.

Climate Change as a Security Threat

Climate change has been largely accepted by both government and private enterprises as a non-traditional security threat (Barnett 2003; Busby 2008; Dalby 2021). Not only is it a threat in its own right, but it also acts as both an accelerant for other national security threats and a catalyst for conflict (Nevitt 2020). At its core, climate change can be considered a borderless threat; it is a vexing global issue that transcends state borders and ultimately affects all of us. Borders cannot stop the threat or consequences of climate change, but we can explore how we might use borders and Customs administrations effectively to mitigate the shared threats and consequences.

One shared borderless phenomenon in this light is trade security: ultimately, Customs administrations have a

responsibility to manage the flow of goods across borders. That means managing both the threats trade can pose as well as the necessary facilitation of trade. There is a natural link between trade security and climate security in this light; on the one hand, trade significantly contributes to climate change. Global trade is critical to both developed and developing nations; however, the production and distribution of goods are significant contributors to CO2 emissions (Li & Haneklaus 2022), increasing the threat. On the other hand, Customs administrations at the core of trade security principles have the mandate and ability to implement facilitation and restriction practices that can effectively contribute to mitigating and adapting to climate change. There is a gap in policy and literature in this space. Focusing on the intersection of trade security and climate security allows us to develop strategies that account for shared consequences.

What is Being Done: Trade Security

Threats to the supply chain no longer sit within the realm of contraband, illicit trade, and the illegal movement of people and goods; rather, adaptation to non-traditional threats, including climate change, is proving necessary. Climate change is a borderless threat exacerbated by how borders are managed. While Customs administrations have sought to collaborate on green customs initiatives, governance efforts have directly focused on climate impacts within the jurisdiction to contain and adapt to them within territorial borders (Benzie & Persson 2019). Customs administrations have endeavoured to develop individual green customs strategies. However, the manifestation of these strategies demonstrates the difficulty in addressing how best to tackle the significant scope of the border and its intersection with climate change.

A key element of border security is the international supply chain. International trade is necessary for economic opportunity and prosperity and provides functional linkages among economic activities across the world (Dent 2021; OECD 2022). It is a critical practice to enable and protect. With that, there is a growing awareness of the vulnerabilities across supply chains to the risks and potential costs associated with the physical and regulatory threats related to global climate change (Jira et al. 2013; Halldórsson & Kovács 2010). Moreover, suppliers are vulnerable to climate as their business activities are likely to be adversely affected by physical changes and regulations related to climate change (De Winne & Peersman 2021; Intergovernmental Panel on Climate Change 2007).

The impacts of climate change have myriad consequences, which is why it is unsuitable to have a one-size-fits-all approach to combat it. Often Customs administrations lean towards compliance and enforcement actions within relevant Multilateral



Environmental Agreements or domestic environmental compliance obligations. This approach underpins why it has been difficult for agencies to encapsulate how climate change can be addressed through the SAFE Framework and active AEO programs. In essence, AEO programs support a global governance structure that can adapt to global initiatives. While the SAFE Framework focuses on addressing supply chain security threats, primarily from human-based sources of harm, the relevance of climate change as a security threat cannot be ignored. Furthermore, expanding the SAFE Framework to encapsulate non-traditional threats will not weaken its utility; rather, it highlights the significant opportunity to leverage an existing and established framework that has been embedded into numerous Customs administrations with substantial Customsto-Business engagement. This is a demonstration of adaptation to non-traditional threats, utilising government agencies and programs internationally, transnationally, or supranationally, at bilateral, regional, and global scales, including AEOs, to support the climate agenda (Benzie & Persson 2019; Persson & Dzebo 2019).

The SAFE Framework

The current SAFE Framework exists through three pillars: Customs-to-Customs network arrangements, Customs-to-Business partnerships, and Customs-to-other Government Agencies cooperation (WCO 2021). Since its inception, the SAFE Framework has consistently been associated with the phase in which Customs authorities verify adherence to customs regulations or specific criteria based on a risk assessment. However, there is an imperative to enhance the SAFE Framework by incorporating criteria related to climate considerations.

Through leveraging the existing pillars, the WCO can expand what is in the scope of 'supply chain security' and adaptation of the program rather than solely looking to controls relating to traditional border threats. Traders already meet compliance standards vis-à-vis Customs legislation and the SAFE Framework. Any amendments should be aimed at incentivising businesses to change their behaviour. In some cases, businesses have already changed their behaviour in light of the climate crisis and these entities should be recognised. It is unnecessary to include additional specific environmental compliance criteria within the SAFE Framework, as traders are already subject to these standards and held to account through the associated regulations and multilateral environmental agreements. Those traders, however, that take additional steps to 'green' their business practices, should be recognised by Customs administrations. An addendum addressing recognition under the Customs-to-Business pillar would facilitate guidance to countries that wish to build out their processes and practices related to this expanded pillar within their local jurisdiction. This initiative provides support for AEO programs that can commit to the additional components that specifically relate to climate change; this could fall into mitigation, adaptation, or both. This addendum would in turn allow each AEO program to define what these obligations and objectives might look like for their AEOs, within the context of their legislative and regulatory frameworks or climate threat environments.

The incentive for traders to obtain AEO accreditation is a lighter touch at the border. In turn, Customs administrations can focus on 'shrinking the haystack' for higher risk traders. Reaching an agreement on the addendum would alleviate tensions arising from different maturity levels of AEO programs and enhance the motivation for proactive climate action among Customs administrations that are willing to meet the supplementary criteria. However, some may argue that when 'countries have different levels of climate ambition, free riders will benefit at the expense of committed countries' (Clausing & Wolfram 2023). In the case of AEO programs, moving to exclude aspirational members who seek to implement higher levels of supply chain security in the pursuit of climate-related initiatives is detrimental to the program's intent. There needs to be a balance between the necessity of secure trade and appropriate encouragement and guidance to members on the implementation of environmental frameworks and upward harmonisation through inclusivity.

Incentivising green trade: AEO Survey Results

Climate change and corporate value are recognised as being inextricably linked. However, the state of businesses undertaking green trade practices that can contribute to climate change initiatives varies significantly. To assess the viability of balancing secure trade and encouraging incorporation, we went to the Traders at the heart of the AEO. In 2023, a survey was disseminated to Trusted Traders from the ABF's AEO, the ATT program. This was the first year a set of 'green trade' questions was included within the annual survey. The set was added for the purposes of this study and relevant studies that will follow; 169 accredited traders responded to the set of specific 'green trade' questions.

Attitudes Towards Climate Security and Trade

Utilising a market segmentation, three main types of entities were clustered among ATTs: climate activist promoters, climate neutral passives, and non-aligned. Respectively, 41% of the respondents considered themselves as climate activists and agreed that climate change was a national security issue. Twenty-six per cent held mixed views of whether climate change was a national security issue but felt that should it be integrated into the ATT program; they should not

be held to a higher level of environmental standards. Finally, 33% had opinions that did not fit into either of the former categories and had an array of experiences that feature across this analysis. From the survey, 66% of ATTs had no understanding or a rudimentary grasp of the 'green trade' concept. As Figure 1 below demonstrates, the concept was not well understood among traders.

Despite this, 86% of Trusted Traders agreed (ranging from tend to agree, mostly agree, and strongly agree) that they as ATTs can play a role in combatting climate change; 74% agreed that climate change is a national security issue, as shown in Figure 2. Despite most ATTs acknowledging the implications of climate change and the role they can play in mitigation and adaptation, not all were on board. One stated "I don't agree that Climate is a national security issue. As traders, sure we can minimise this within our supply chain, but it should not be an ABF topic. ABF need to concentrate on security issues which have far more immediate consequences to our country". Interestingly, when

asked if the ATT program could be improved to support green trade, combined agreement dropped to 64%. Less than half (43%) agreed that ATTs should be held to a higher standard of environmental sustainability than non-Trusted Traders.

Across the respondents, 59% are currently undertaking green practices in relation to their physical trade or supply chain. When asked about opportunities for improving environmentally sustainable supply chains, most ATTs referred to packaging initiatives. These ranged from environmentally sustainable packaging (such as compostable pallet wrapping) to reduced plastics use and increased recycling activities. Carbon offsets and carbon trading schemes were also broached.

Adapting the ATT Program for Climate Change

The purpose of this study is to assess the viability of adapting the ATT program to incorporate green trade practices. As the Traders themselves are at the heart of the AEO, any adaptations should include their inputs.

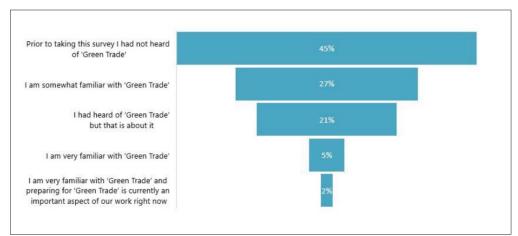


Figure 1. ATTs' Familiarity with the Concept of "Green Trade". Figure source: ARTD (2023), 3.

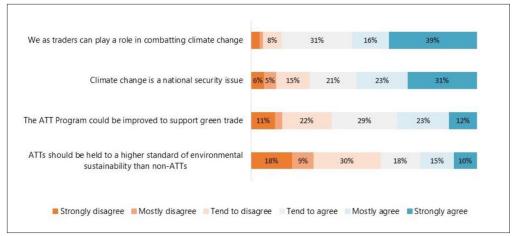


Figure 2. ATTs' Attitudes to Climate Security and Trade. Figure source: ARTD (2023), 4.



When asked how the AEO could be improved to support green trade, ATTs responded that incentives should be included to promote a shift to green trade practices. Most suggestions stemming from this question involved removing some taxes to recognise green trade practices and implementing taxes for goods and services that do not promote green trade. For example, the import of plastic goods should be taxed, whereas the import of fibre-based products would be tax free. While some of this is beyond the remit of what the ABF can unilaterally do, the incentives-based framework was a key outcome. Traders also voiced that the program should be promoting and encouraging greener alternatives to current trade and guidance on green trade initiatives, audits, and benefits for the ATT holder. While the incentives will need to be jurisdictionally contextual, there can be broad-reaching incentives, such as green trader logos and tiered clearance protocols at the border.

Implications

Most respondents advocated for the inclusion of green trade practices within the ATT program. In light of the climate crisis, the ATT program has the potential and responsibility to reshape our perspective on supply chain security and related initiatives. This program is among the key initiatives in this regard. The Customs-to-Business pillar serves as an initial step in the process of aligning the SAFE Framework with actions that can effectively contribute to adapting to our evolving world. With the backing of traders and continuous consultation, it is attainable within the Australian AEO. The addendum should be assessed in the specific jurisdiction where it is implemented, but the adaptation methods we describe are well-suited for this purpose.

Implementation

We recommend incorporating a 'green trader' certification within the AEO framework. Traders who request to be accredited as a 'green' trader would need to verify their claims. The verification of the international standard or certification is critical to the process to attempt to avoid greenwashing and assure industry and government of claims. Certifications or standards that are proposed initially to consider in the framework are listed in Table 1.

This list is non-exhaustive but represents a starting point for recognising existing certifications. Ongoing requirements for verification of continued adherence with green standards or certifications for the trader would need to be built into existing assurance programs. The use of external certifications provided by not-for-profit organisations may be contentious as some organisations may seek to obtain certifications erroneously, but such risks are outweighed by the need for amelioration.

Coupled with the verification of certification, traders would be required to provide a climate risk assessment applicable to their supply chain and business footprint. This should consider their mitigation strategies and governance that specifically relates to climate impacts. such as disaster disruption to suppliers or transport routes. This would require a trader to evaluate their business and how climate may affect their business sector. Climate risk assessments provided by traders should also build in considerations of climate resilience. understanding the material risks and opportunities and the implications for the organisation. A climate risk assessment could be informed by International Standard ISO 31000 for Risk Management; ISO 31000 is already referred to by ABF's Trusted Trader program in assessing an entity's supply chain security risk assessment. Expanding the risk assessment to include climate risks would require limited investment by entities seeking 'green' recognition by Customs officers, with the outcomes providing a greater payoff.

Another crucial component of this recommendation pertains to education. This is twofold: Customs officers cannot be expected to become experts in all matters of climate, rather they will need training to familiarise themselves with the standards and certifications provided by entities seeking to demonstrate adoption and adherence to their commitments. Second, education for the Trusted Traders will be required. Survey respondents identified this as well, and there were several suggestions focused on raising awareness and providing resources and education about green trade. These include awareness workshops, involving CITES and environmental protection agencies, educating Traders on how to go about conducting «due diligence» investigations to the standard ATTs wish to attain. More awareness of the program and the implications of incorporating green trade was also suggested and should be provided. Traders identified that education and recognition as opposed to financial benefit should be provided; both of which can be provided in the suggested AEO addendum. Additional benefits and offering an ATT logo to reflect they are supporting green trade can also be considered.

Considerations for International Compatibility

It is important to look beyond the Australian border to assess the international compatibility of such suggestions. The U.S. Customs and Border Protection (USCBP) Green Trade Strategy identifies that Trusted Trader programs, including their own Customs Trade Partnership Against Terrorism (CTPAT), 'continue to be an effective method to incentivize positive change in private industry and could be leveraged to encourage green trade practices' (USCBP 2022, 5). The extent to which Customs administrations can incentivise green trade and suitably 'assess' what green trade practices are is underdeveloped. Similarly, the ABF's Green

Table 1: International Standards and Certifications. Source: author's research.

Fairtrade standard certification	The Fairtrade Standards establish the criteria for farmers, workers, traders and other stakeholders to participate in this approach to trade.
International Sustainability and Carbon Certification (ISCC Plus)	ISCC PLUS is a sustainable certification scheme for bio-based, renewable and circular raw materials. It demonstrates the voluntary implementation of sustainability goals on a global scale, interconnecting the entire supply chain.
Forest Stewardship Council Chain of Custody Certification	The Forest Stewardship Council (FSC) is an international, non-governmental organisation that promotes responsible management of the world's forests.
ISO 14001 Family: Environmental Management	ISO 14001 sets out the criteria for an environmental management system and can be certified too. It maps out a framework a company or organisation can follow to set up an effective environmental management system. Certification should be formally issued rather than only the implementation of guidelines.
EP100 (The Climate Group)	EP100 is a global corporate energy efficiency initiative, led by the Climate Group, bringing together over 125 ambitious businesses committed to improving their energy efficiency.
CDP (Premium or Supply Chain)	CDP is a not-for-profit charity that runs the global disclosure system for entities to manage their environmental impacts.
	Supply chain: Being a CDP Supply Chain member supports entities to engage suppliers, pinpoint risks and identify opportunities to set and achieve science-based targets, zero-deforestation, and water security targets.
Rainforest Alliance	The Sustainable Agriculture Standard, along with its assurance and technology systems, are designed to drive more sustainable agricultural production and responsible supply chains.
EcoVadis	EcoVadis is an international company that provides business sustainability ratings. A member of the UNGC, it rates companies based on international sustainability standards, including the GRI, UNGC, and ISO 26000. It illustrates performance across four themes: environment, labour and human rights, ethics, and sustainable procurement. It also provides enterprise solutions for sustainable supply chains.

Customs Framework considers that benefits could be offered to accredited traders through Australia's AEO programs to incentivise green trade practices. The definitions of green trade practices are broad. For the scope of this paper, it has been defined in line with the WCO's own definition as environmentally friendly trade practices and supply chains.

The WCO assessed that 'leveraging trade to support the transition of the global economy toward sustainability requires not only a reorganization of business practices towards more corporate social responsibility but also a change in mindset to allow for the adaptation of regulatory approaches and operations' (WCO 2023). The advancement of environmental goals through the SAFE Framework would require a new approach to engagement with traders, specifically requiring

Customs agencies to recognise or assess private enterprise green trade practices.

We recognise there are 80 AEOs currently in operation worldwide, and assessment of all of them for compatibility purposes is beyond the scope of this paper; however, this is a pathway for future research. Still, assessing green trade practices needs to step beyond the current commitments within the SAFE Framework. Front line officers need tangible and realistic measures and guidance to deliver on their AEO's commitment to any additional addendum. A framework to facilitate this can be developed by leveraging proven and established sustainability or environmental certification processes, including international standards, to validate claims of green trade practices. The guiding principle behind this approach is that existing rules and standards can be



gradually incorporated as the framework develops, with additional certifications or standards being recognised along the way. This would capture certifications that are relevant to whole of industry or are industry specific. As governments move towards meeting climate targets, the accepted certifications can be modified.

Conclusion

The remit of Customs administrations should continually adapt to meet the challenges of evolving border threats, including the non-traditional threat of climate change. Climate change and its threats to national and global security are pressing issues requiring a concerted approach. The nexus of trade security and climate change has been drawn out in this article, resulting in a novel recommendation regarding how to attend to some of the threats climate change poses. The SAFE Framework is a central consideration in addressing this nexus.

Customs administrations can be at the forefront of climate-friendly trade practices and policies, contributing to environmental protection: Adapting AEO programs is one example of how administrations can contribute to that protection. Introducing green trader certifications, requiring climate risk assessments, educating officers and traders on climate action commitments, and incentivising green trade are all suggestions put forward in this article. Through insights from ATT members, it is apparent that this adaptation would be welcomed. By leveraging AEO programs to consider not just human security threats in the supply chain but also climate threats, Customs administrations will enable resilient supply chains and build up industry to utilise all means available to mitigate against the consequence of climate change.

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Note

1 For conceptual clarity, we are employing the referent Customs administrations as opposed to border security/ border agency/border force. We acknowledge that many Customs administrations in the world are part of a larger border framework

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