

From: Patrick Rivers [mailto:privers@kleenheat.com.au]
Sent: Friday, 23 November 2012 6:35 PM
To: Excise Consultation; ITX EEG
Cc: Mark Gadsby; Kylee Hetherington; Michael Watts; John Griffiths
Subject: RE: Review of the Legal and Administrative Framework for Excise Equivalent Goods - Thank you [SEC=UNCLASSIFIED]

For the attention of Treasury and ATO,

Kleenheat appreciates the opportunity to participate in industry consultation with respect to excise equivalent goods. I am taking this opportunity to give written feedback on points of interest from the conference call on Monday 12 November.

- **Entity licensing:** Kleenheat would support the principle of entity level licensing, with the duration (three years) and fee structure (nil cost) of the excise system. We would like to see more detail about the practicalities of this proposed change, i.e. would this result in a genuine reduction in the number of forms that we have to complete with regard to individual sites covered by the entity level licence? Secondly, at what level would the entity be defined? Kleenheat operates a number of legal entities within its overall business structure – would the entity level licensing potentially be expanded to cover groupings of entities?
- **Imports:** this activity requires the completion of various forms to import the product to the warehouse and then bring the product into the excise system. Kleenheat has found that the process and admin for imports has been lengthy and time consuming.
- **Electronic lodgement:** currently the options for lodging weekly excise returns are post or fax. Post is not feasible because this would encroach on our time for preparation of the returns. Fax is unreliable; there have been a number of instances when fax submissions have been sent in full but not received in full. An electronic process would offer significant benefits for timely and accurate submissions.

A menu of options was also briefly described during the call. Based on the information available, Kleenheat would support the highest level option, being new legislation to harmonise the administration of excise and excise equivalent goods. We would appreciate the opportunity to see more detailed documentation on the options that were described.

Regards,

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