

LEADING AUSTRALIAN BUSINESS

ACCI SUBMISSION TO PRODUCTIVITY COMMISSION: REVIEW OF BILATERAL AND REGIONAL TRADE AGREEMENTS (BRTAs)







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1. ACCI LEADING AUSTRALIAN BUSINESS

ACCI has been the peak council of Australian business associations for 109 years and traces its heritage back to Australia's first chamber of commerce in 1826.

Our motto is "Leading Australian Business."

We are also the ongoing amalgamation of the nation's leading federal business organisations – the Australian Chamber of Commerce, the Associated Chamber of Manufactures of Australia, the Australian Council of Employers Federations and the Confederation of Australian Industry.

Membership of ACCI is made up of the State and Territory Chambers of Commerce and Industry together with the major national industry associations.

ACCI also operates internationally. It represents Australian business in the forums of both the international chamber movement and the international employer movement and is recognised by international bodies as the most representative voice of Australian business organisations.

Through our membership, ACCI represents over 350,000 businesses nation-wide, including over 280,000 enterprises employing less than 20 people, over 55,000 enterprises employing between 20-100 people and the top 100 companies.

Our employer network employs over 4 million people which makes ACCI the largest and most representative business organisation in Australia.

1.1 Our Activities

ACCI takes a leading role in representing the views of Australian business to government, our federal parliamentarians, government agencies and regulators.

Our objective is to ensure that the voice of Australian businesses is heard, whether they are one of the top 100 Australian companies or a small sole trader.

Our specific activities include:

- representation and advocacy to Governments, parliaments, tribunals and policy makers both domestically and internationally;
- business representation on a range of statutory and business boards and committees;
- representing business in national forums including Fair Work Australia, Safe Work Australia and many other bodies associated with economics, taxation, sustainability, small business, superannuation, employment, education and training, migration, trade, workplace relations and occupational health and safety;
- representing business in international and global forums including the International Labour Organisation, International Organisation of Employers, International Chamber of Commerce, Business and Industry Advisory Committee to the Organisation for Economic Co-operation and Development, Confederation of Asia-Pacific Chambers of Commerce and Industry and Confederation of Asia-Pacific Employers;
- research and policy development on issues concerning Australian business;
- the publication of leading business surveys and other information products; and
- providing forums for collective discussion amongst businesses on matters of law and policy.



1.2 Publications

A range of publications are available from ACCI, with details of our activities and policies including:

- The ACCI Review, an analysis of major policy issues affecting the Australian economy and business.
- Submissions and policy papers commenting on business' views of contemporary issues affecting the business community.
- The Policies of the Australian Chamber of Commerce and Industry.
- The Westpac-ACCI Survey of Industrial Trends the longest, continuous running private sector survey in Australia. A leading barometer of economic activity and the most important survey of the Australian manufacturing industry.
- The ACCI Survey of Investor Confidence which gives an analysis of the direction of investment by business in Australia.
- The Commonwealth Bank ACCI Business Expectations Survey which aggregates individual surveys by ACCI member organisations and covers firms of all sizes in all States and Territories.
- The ACCI Small Business Survey a regular survey of small business conditions and expectations.
- Workplace relations reports and discussion papers, including the ACCI Modern Workplace: Modern Future 2002-2010 Policy Blueprint and the Functioning Federalism and the Case for a National Workplace Relations System and The Economic Case for Workplace Relations Reform Position Papers.
- Occupational health and safety guides and updates, including the National OHS Strategy 2002-2012 and the Modern Workplace: Safer Workplace 2005-2015 Policy Blueprint.
- Trade reports and discussion papers including the Riding the Chinese Dragon and Riding the Indian Elephant Position Papers.
- Education and training reports and discussion papers, including the Skills for a Nation 2007-2017 Policy Blueprint.
- The ACCI Taxation Reform Blueprint: A Strategy for the Australian Taxation System 2004—2014.
- The ACCI Manufacturing Sector Position Paper The Future of Australia's Manufacturing Sector: A Blueprint for Success.
- The ACCI President's Report a periodical on ACCI corporate activities.
- The ACCI Annual Report and Business Review, providing a summary of major activities and achievements for the previous year.

Most of this information, as well as ACCI media releases, submissions and reports, is available on our website – www.acci.asn.au



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2. Introduction

- 1. The Australian Chamber of Commerce and Industry (ACCI) welcomes the opportunity to provide a submission to the Productivity Commission (PC) on Bilateral and Regional Trade Agreements (BRTAs). As part of ACCI's internal consultation process with its members and other business stakeholders on this issue, ACCI hosted one of the largest surveys undertaken of its kind in order to determine the actual views of business (see attachments).
- 2. ACCI is Australia's leading peak industry group representing over 350,000 businesses nationally. These business cover a range of sectors including engineering, construction, automotive, food, wine, transport, freight forwarding, ICT, printing, mining and services industries. ACCI's trade-related businesses number approximately 20,000.
- 3. ACCI has been a strong advocate of open markets, and recognises the important contribution trade makes to economic well-being and the development of competitive and world class industries. Australia's trade liberalisation framework should be developed in partnership between business and government, be strategic in focus, consultative, reflective of actual business opportunities and contribute to the sustainability of our export sector. However, evidence shows that reform is needed to the current framework in order to deliver optimal results.

3. Australia and International Trade

- 4. According to our survey results, business and industry in the trade-related sector are failing to see major benefits of BRTAs, although this view may preclude appreciation of the less visible second-round impact of trade liberalisation such as lower imput prices for their operations. The unilateral reforms of the 1980s and 1990s have led to Australia being one of the most open economies in the world. While this openness has benefited the economy through specialisation and increased competitiveness, Australian business is now facing increasing pressure from global competition both at home and in overseas markets.
- 5. According to the Mortimer Review "the growth of export volumes has been markedly slower in this decade than in the previous two decades. Australia has lost global market share in manufactures, services, agriculture and resource exports. After rising rapidly in the 1980s and 1990s, the share of export in our GDP has declined".
- 6. In 2005, Bill Carmichael, in his paper *Trade Policy at the Cross-Roads*, pointed out that there are gains to trade from adopting a domestic reform agenda. However,



unless these reforms are extended into all aspects of a market, it will become difficult to maintain the momentum for trade liberalisation, particularly in a domestic market. Such reform would ideally take the form of a multilateral tariff reform agenda through the World Trade Organisation (WTO). Carmichael called for a greater role for the Productivity Commission (PC) in driving the domestic reform agenda and keeping trade negotiators accountable for the benefits of bilateral and regional agreements. Under this suggestion, the PC would also act as an honest broker to ensure that the negotiation process would remain balanced between industry and government interests. Importantly, Carmichael mentioned the importance of Behind the Border (BTB) barriers which will be addressed in a later section of this submission.

- 7. Unfortunately, little action has been taken since Carmichael wrote his paper in 2005, nor following similar findings of the Mortimer Review. This is a disappointing outcome from the perspective of industry. More action could have been taken in recent years to reform trade facilitation in order to better support industry in its drive to increase the share of exports in Australia's GDP, and to increase access for Australian firms in overseas markets. In addition, the multilateral reform agenda is faltering and subsequently the domestic reforms that have been made are unable to deliver results to their full potential.
- 8. ACCI would like to see a greater strategic and coordinated approach to trade policy, in order to both benefit domestic industry and also to provide Australian business with better access to overseas markets.

4. REVISITING CARMICHAEL

- 9. One of Carmichael's key concerns was that barriers to trade were being pushed out of the reach of the WTO, and subsumed into domestic protectionist measures, or Behind the Border (BTB) barriers. Business are similarly concerned that BTB barriers are impacting negatively on their ability to trade in the international arena. Focusing on access for Australian business solely through tariff-reduction, while very important, misses a key barrier to trade. Addressing these BTB barriers should be a key strategic focus for government, however it is unclear if there is currently an effective government mechanism addressing this issue.
- 10. Second, Carmichael, in arguing for bolstering the role of the PC in providing an honest assessment of unilateral, bilateral and multilateral trade liberalisation, warned that this approach may skew decisions towards industry interests. ACCI believes that in actuality the opposite situation has ensued, and decisions made have not been beneficial to industry as a whole. ACCI believes that wider industry consultation is necessary and at present many industry players are not being included in the consultation process. An industry consultative forum could



be established through the PC, or as a second option, the Department of Foreign Affairs and Trade (DFAT), which would ensure industry voices are heard. This kind of approach would bring Australia into line with processes in other countries. Industry is much more directly involved with the FTA negotiations processes, for example, in the United States than in Australia.

5. FREE TRADE AGREEMENTS AND AUSTRALIA

- 11. In order to more greatly benefit Australian industry, BRTA and wider trade liberalisation reform is necessary. BRTAs are one part of the process of trade liberalisation and need to be understood in this context. As Carmichael pointed out, a spectrum of approaches to trade liberalisation will all yield benefits (from unilateral to multilateral), but ideally these should be delivered under a single strategic framework.
- 12. Greater coordination is currently required between industry and the relevant government departments including DFAT, Austrade, and other Federal and State trade related departments.
- 13. According the ACCI's survey of businesses associated with trade, a number of themes were apparent. The most significant include:
 - a) SMEs are time poor and it is difficult for them to be involved in the BRTA process as much as they would like, or as much as is necessary to develop a comprehensive agenda truly reflecting business needs and desired outcomes;
 - b) Government departments, big business or a combination of the two appear to be driving the BRTA agenda at the macro and micro level. This is not necessarily intentional;
 - c) A small number of companies believed that FTAs had positively benefited their business, although some companies remained sceptical and did not view BRTAs as of benefit to their business;
 - d) At best, based on the survey results, FTAs are marginally beneficial to business. This is consistent with previous findings, the findings of other business surveys, and the views of a number of industry groups;
 - e) The promotion of the bilateral FTA market as a good place to do business is benefiting business when choosing markets, but actual market access issues do not appear to have significantly improved;
 - f) The current BRTA process is not transparent and for the BRTA agenda to have more benefit to business, both business and industry groups



- need to have greater input or need to be included directly in negotiations;
- g) Significant behind-the-border issues, arguably as important as tariff reductions, have not been adequately addressed in the BRTA process either prior to or following the signing of FTAs;
- h) Practical trade facilitation measures through Austrade (such as the EMDG scheme) were of more benefit than FTAs themselves;
- i) Greater practical information is required by business from government; and
- j) The BRTA process is seen by some companies as self-serving and that there may be more cost efficient processes available to government in delivering the current BRTA agenda.

6. THE BRTA PROCESS

- 14. Far from Carmichael's concern that the BRTA process might be skewed towards industry interests, the opposite has ensued. In actuality, trade negotiators in DFAT would benefit from greater input and engagement from industry. One reason for some industry disengagement is perhaps time constraints faced by SMEs precluding them from providing input into the process. As well as improving consultative mechanism to encourage more feedback, it would also be beneficial to involve industry groups in the negotiation process. This will not only help to better direct negotiators with real input from business but also provide greater transparency into the BRTA process.
- 15. As it currently stands the BRTA process is not delivering practical benefits as well as it could. BRTAs have become the key area and the key means in which trade liberalisation is assumed to be achieved. This is an incomplete interpretation, and a strategic, consultative and outcomes-based approach wider than just BRTAs is necessary. As pointed out by Ross Garnaut in a recent forum on the Productivity Commission's Review of Bilateral and Regional Trade Agreements:

There has been reform malaise in the 2000s, resultant productivity stagnation, and the need to revitalise the reform agenda. The obsession with BRTAs is possibly causal, not merely symptomatic of the malaise.

16. ACCI is sympathetic of this assessment. While BRTAs have had little effect in the eyes of business, the BRTAs agenda remains stronger than other trade facilitation efforts. This was also a risk that Carmichael flagged in his 2005 paper. One reason for the over-emphasis on BRTAs in trade facilitation is that they are



process driven, and can subsequently lack strategic direction and coordination across the spectrum of trade-related issues. Given the lack of outcomes under the current Doha round of multilateral trade liberalisation, and what appears to be domestic reform fatigue, trade liberalisation cannot simply be 'bolstered' singly through BRTAs and within one government department.

- 17. Further, the cost of the current BRTA agenda is unavailable to business or the public. This adds weight to the view that the current process lacks transparency and is failing to deliver outcomes. Business speculates that the funding directed towards the BRTA agenda is likely to be greater than amount provided to industry under the highly successful schemes designed to develop markets, such as the Export Market Development Grants (EMDG) Scheme (discussed below). However the BRTA is delivering less visible benefits and therefore it is especially important that its costs and procedures are publicised.
- 18. As previously stated, until greater co-ordination is achieved between industry and trade-related government departments, outcomes in respect to trade facilitation including BRTAs will continue to disappoint.

7. BRTAS: THE BIGGER PICTURE

- 19. While BRTAs can support Australia industry if developed within a strategic framework, the implementation of an agreement is not the whole solution to the problems faced by Australian business and industry in accessing overseas markets.
- 20. BRTAs are only part of the trade facilitation process, and need to be improved through greater transparency and consultation, as well as supported through BTB reforms in overseas markets, overseas market development, and a unilateral and multilateral reform agenda.
- 21. Export market development support by the Federal Government plays a very important role not only in identifying key markets for possible targeting with FTAs, but also in delivering the promoted benefits of a signed FTA. However, in recent years, government support through the Export Market Development Grants (EMDG) Scheme has been reduced.
- 22. The Mortimer Review noted that the Federal Government devotes \$675 million per year to trade and investment programs. Of these programs, the EMDG Scheme is one of the most effective.
- 23. The EMDG Scheme is administered by Austrade, and is a highly effective support to overseas market development and access. It provides critical funding to many SMEs during the costly and complex initial phases of identifying and



- establishing new export markets through the reimbursement of up to 50 per cent of expenses incurred on eligible export market promotion activities.
- 24. According to the Mortimer Review, one dollar granted under the scheme generates between \$13.50 and \$27 in additional exports. Despite the strong economic arguments for the EMDG Scheme, it has been dramatically cut in recent years.
- 25. The national network of TradeStart Export Advisors is also essential in providing much needed assistance to help SMEs launch their export activities. While it is a modest program, TradeStart has had a positive impact on Australian business. Since 2002, more than 2000 businesses have achieved more than \$750 million in exports with very limited funding.
- A whole scale review of the current system of trade liberalisation, market access and government approaches to trade is required with the view to provide greater coordination between industry and across federal and state trade-related government departments. Such a review is likely to find that EMDG funding and TradeStart funding should be increased due to their proven effectiveness in increasing export revenue.
- 27. The current approach of narrowly-focused reviews with unclear deliverables is inadequate in addressing major structural deficits in the trade-related area, and is having little benefit to an industry already under increasing pressure with respect to domestic as well as overseas market access.

8. CONCLUSION

- ACCI and its members are strong supporters of multilateral trade negotiations, and of a trade agenda (including BRTAs) that delivers tangible and definitive outcomes for Australian business and industry. The current approach, and the current utilisation of process driven BRTAs, is not delivering these outcomes in full.
- 29. ACCI supports the free trade philosophy and recommends that it is incorporated into a coordinated and strategic approach by government. The BRTA agenda appears to lack coordination or a long-term strategy.
- 30. The Mortimer Review concluded that a nation's export performance is a measure of the capacity of its industries to successfully compete internationally. The measure of such international competitiveness must be wider than simply the assessment of Australia's performance in markets covered under BRTAs. Australia must also seek to gain competitiveness in other markets. As such, the trade liberalisation agenda should not be restricted to BRTA promotion only.



Instead, an over-arching trade liberalisation agenda should incorporate wider industry consultation including a greater role for industry group input.

- 31. Moreover, Mortimer recommended that when considering Australia's future FTA partners, two overarching considerations should be taken into account. One is the potential achievement of ambitious levels of trade and investment liberalisation, and the second is the likelihood that outcomes are delivered in a timely manner and position Australia to play a greater role in the Asia-Pacific region. However, evidence suggests that trade negotiations often focus more heavily on the first consideration. This makes the FTA process drawn-out and fails to deliver practical and timely results for business. Negotiators should be more mindful of business needs, which would be achieved through increased industry participation in the negotiation process.
- 32. Australia needs to build upon its domestic reforms and adopt a strategic approach to developing more integrated regional economies in the Asia-Pacific. While BRTAs are important they comprise only one part of the process.
- 33. A successful trade liberalisation agenda should be based on a coordinated government approach that is consultative of Australian industry. As such, this submission fully supports the Mortimer Review proposal that the Federal Government strengthen the linkages between market access negotiations, trade and investment promotion and facilitation and market development.
- 34. ACCI encourages government to consult more widely with industry and seek business input into the trade liberalisation agenda including the BRTA process. This would also include a willingness to provide greater support to viable complementary programs that deliver results and value for money, such as the EMDG scheme and TradeStart, as well as utilise industry's knowledge of BTB barriers in overseas markets.
- 35. ACCI would welcome further discussions with government during the process of reforming an over-arching trade liberalisation agenda to provide supplementary advice on the issues raised in this submission and in the survey results (attached).



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