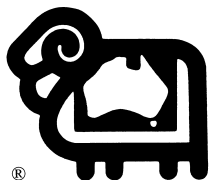


# **AUSTRALIAN COUNCIL of WOOL EXPORTERS & PROCESSORS INC**



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26 June 2015

ACWEP-15-088

The Secretary  
Joint Select Committee on Trade and Investment Growth  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

By Email: [jsctig@aph.gov.au](mailto:jsctig@aph.gov.au)

Dear Sir / Madam,

**Submission from the Australian Council of Wool Exporters and Processors Inc**  
**To the Joint Select Committee on Trade and Investment Growth**

The Australian wool industry has had limited experience with existing Free Trade Agreements. But, the Australian Council of Wool Exporters and Processors is in a position to make some comments on its expectations; and on experiences gained by the New Zealand wool industry that are of relevance to Australia.

Our Submission is addressed under the following headings:

1. **Background**
  - 1.1 **Australian Council of Wool Exporters and Processors Inc (ACWEP)**
  - 1.2 **Free Trade Agreements**
2. **Experience with Countries with whom Australia has a Free Trade Agreement**
3. **Recent Free Trade Agreements**
4. **The Importance of Free Trade Agreements to the Australian Wool Industry**
  - 4.1 **Tariff Rates**
  - 4.2 **Other Factors – Tariff Rate Quotas (TRQ)**
  - 4.3 **Other Factors – Country Specific Tariff Quotas (CSTQ)**
  - 4.4 **Other Factors – Interpretation of Words**
5. **Key Free Trade Agreements for the Australian Wool Industry**
  - 5.1 **China**
  - 5.2. **India**
6. **Appendix 1 Destinations for Australia's Wool Exports by Weight, 2014/15 (to April)**
7. **Appendix I1 Destinations for Australia's Wool Exports by Value, 2014/15 (to April)**

## **1. Background**

### **1.1 Australian Council of Wool Exporters and Processors Inc (ACWEP)**

The Australian Council of Wool Exporters and Processors represents Australian wool exporters and Processors in relation to matters associated with the purchasing, processing (if done in Australia) and exporting of wool.

This involves interacting with:

- \* Wool grower organisations.
- \* Wool brokers, who facilitate the exchange of ownership via auction of most Australian wool.
- \* Other service organisations, such as the Australian Wool Exchange and the Australian Wool Testing Authority.
- \* The Federal Department of Agriculture, generally on matters relating to the veterinary / biosecurity requirements of customer countries; and to a lesser extent on Australian requirements for importing wool.
- \* The Department of Foreign Affairs and Trade on non-veterinary trade issues, in particular on Free Trade Agreements.
- \* Equivalent wool exporter organisations in other wool exporting countries.

### **1.2 Free Trade Agreements**

With regards to Free Trade Agreements, ACWEP provides information to the Department of Foreign Affairs and Trade on:

- \* Current wool production scenarios.
- \* Details of volumes exported to relevant countries; and of any changing patterns.
- \* Details of issues experienced by wool exporters in exporting to countries with which FTAs are being negotiated.

## **2. Experience with Countries with whom Australia has a Free Trade Agreement**

The United States of America is the only country which Australia has a long term Free Trade Agreement with that includes wool. The FTA was finalised in 2004.

There is little to report on this FTA from a wool perspective, as:

- \* Tariffs on wool were left virtually unchanged in the FTA; or were set to reduce over a period of time.
- \* The United States was not a major customer country at the time of the Agreement.

It accounted for 0.7% of Australia's wool exports in 2003/04; and currently accounts for less. 0.3% of Australia's wool exports went to the United States in the 2013/14 financial year and 0.4% has gone there to the end of April in the current financial year.

The fall in wool exports to the United States is more like to be a consequence of the decline in the United States textile industry over the last eleven years, than to the failure to negotiate a better outcome for wool in the FTA.

## **3. Recent Free Trade Agreements**

Australia has negotiated Free Trade Agreements with China, Korea, Japan and Thailand in recent years. Each of these countries has a wool processing industry.

With the exception of China (which will be referred to later), none of these countries imposed a tariff on Australian wool before the FTAs were implemented. Hence, there were no specific benefits (or disadvantages) for wool arising from these FTAs.

## **4. The Importance of Free Trade Agreements to the Australian Wool Industry**

### **4.1 Tariff Rates**

The opportunities for the Australian wool industry to benefit from tariff rate reduction in bilateral Free Trade Agreements depend of the pre-existing tariff rate and the volume of wool exported to the FTA partner.

With regard to tariff rates:

- \* Australia is the largest producer of wool in the world, particularly for use in apparel. (Note, China has more sheep)
- \* Most countries that import Australian wool either have relatively small numbers of domestic sheep and / or they are primarily used for meat or dairy production, rather than wool production. The wool from such sheep is invariably of limited value for apparel.

This means that there is little, if any, need for Australia's customer countries to impose tariffs on imported greasy wool to protect their domestic wool growing industries.

Only China, India and the United States (already discussed) have imposed tariffs on wool imports in recent years; and they have generally been low when compared with tariffs imposed on other agricultural commodities. China and India are Australia's two most important export destinations for wool.

#### *Differential Tariff Rates for Greasy and Processed Wool*

Where tariffs are applied, there are often differential tariffs imposed for "Raw Wool"<sup>1</sup> (greasy, scoured or carbonised wool) and for wool Tops<sup>2</sup>. Raw Wool is classified as a raw material, whereas Tops are classified as manufactured product.

#### **4.2 Other Factors – Tariff Rate Quotas (TRQ)**

While reduction of tariff rates is an important consideration (particularly in negotiating an FTA with India), alleviation of other barriers to trade is also important.

This includes the application of Tariff Rate Quotas (TRQ) (the quantity of wool that can be imported at the standard tariff rate), as occurs with wool (and other commodities) exports to China. TRQs are global - they are not specific to any particular country.

China has a TRQ of 287 million kilograms for Raw Wool and 80 million kilograms for wool Tops imported to China within each calendar year.

The tariff rates for wool imported within the respective TRQs are 1% for Raw Wool and 3% for Tops.

China nominally has a tariff rate of 38% for wool imports that exceed the TRQ. But, in practice, wool imports that would exceed the TRQ are prevented from entering China.

The global Tariff Rate Quota (TRQ) for greasy scoured and carbonised wool has been reached twice in the last ten years. There was little impact the first time (2006), as the TRQ was reached in November.

However, there were serious implications for the wool industry the second time (2007), when the TRQ was reached in July. It was very disruptive to trade and costly to Australian wool exporters. Attempts to resolve it included the then Minister for Agriculture, Warren Truss.

#### **4.3 Other Factors – Country Specific Tariff Quotas (CSTQ)**

FTAs negotiated between China and other countries (and now Australia) include a "Country Specific Tariff Quota" (CSTQ) for some commodities, including wool. CSTQs specify the amount of a commodity that can be exported tariff-free to China by the nominated exporting country.

CSTQs invariably apply to a portion of a country's exports to China.

Product exported to China in excess of the CSTQ is subject to a standard tariff rate as defined under the relevant TRQ.

The New Zealand Government negotiated a CSTQ of 20 million kilograms (20,000 tonnes) of "Clean Wool"<sup>3</sup> equivalents, rising by 5% per annum as part of their FTA with China in 2008.

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<sup>1</sup> Scoured wool is wool that has been washed (scoured) to remove the grease, dirt and sweat.

Carbonised wool is scoured wool that has been treated with Sulphuric Acid to make the grass seeds and sticks present in scoured wool brittle and easy to remove before further processing.

<sup>2</sup> Wool Tops are the last stage prior to wool being spun into yarn. Tops are a loose continuous filament of wool about three inches in diameter.

<sup>3</sup> Clean wool is scoured wool (see previous page).

### ***Relationship between TRQs and CSTQs***

CSTQs effectively increase global TRQs by the quantum of the CSTQs, as the CSTQs apply to the first wool (or other commodity) exported to China in each calendar year. In the case of wool, New Zealand's CSTQ effectively increased the TRQ by 20 million kilograms in 2008, increasing by 5% per annum.

Australia has negotiated a CSTQ of (30 million kilograms (rising by 5% per annum), making it increasingly unlikely that the TRQ of 287 million kilograms will be challenged in the near future.

#### **4.4 Other Factors – Interpretation of Words**

Experience gained by New Zealand wool exporters has been invaluable; and highly relevant to Australia's negotiations with China. It indicated that there can be some surprises.

Advice from New Zealand was that their FTA refers to wool exported to China under the CSTQ as being exported "directly" to China. Unexpectedly for New Zealand, China interpreted "directly" to mean on the one vessel from New Zealand to China. However, virtually all New Zealand wool exports to China are transhipped to another vessel on route to China. China interpreted this as falling outside their definition of "direct", despite the fact that the containers are not opened or interfered with in any way during transhipment.

The "solution" has been for New Zealand exporters to obtain a "Transshipment Certificate" from the country where the wool is transhipped attesting to each consignment's integrity. Advice from New Zealand is that the "Transshipment Certificates" cost about \$US400, plus logistical inconvenience.

The Australian Council of Wool Exporters and Processors provided this advice to DFAT with a request to avoid a similar occurrence with an Australian FTA, as all wool exports from Western Australia to China are transhipped in Singapore.

We do not know, but it could well have implications for other commodities.

## **5. Key Free Trade Agreements for the Australian Wool Industry**

### **5.1 China**

China is Australia's largest customer country for wool, taking between 73% and 79% of Australia's wool exports since 2008/09.

Prior to negotiation of the FTA, China imposed a 1% tariff on Raw Wool and a 3% tariff on wool Tops. There is a global TRQ of 287 million kilograms of clean wool equivalents for Raw Wool and 80 million kilograms for wool Tops (Australia no longer exports wool Tops).

As mentioned above, the Australia has negotiated a CSTQ of (30 million kilograms (rising by 5% per annum over nine years) for wool.

While this has limited monetary benefit (around \$A3 million per annum) because of the low level of the tariff, it is hopefully the start of Chinese moves towards a more liberalised approach to import regulations that lead to expansion of the CSTQ to 100% of Australia's wool exports to China and to simplification of import regulations.

### **5.2 India**

India is Australia's second most important export destination for wool, with between 6.1% and 8.0% of Australia's wool exports going there since 2008/09.

India traditionally had high tariffs (15 to 20%) for wool imports. It is understood that this was Revenue driven, rather than an attempt to protect their domestic wool growing industry. Like China, India's domestic sheep flock is of poor quality for use in apparel.

The current tariffs are 5.15% for Raw Wool and 37.7% for wool Tops.

There are no Quotas; and it appears unlikely that any will arise as part of the FTA negotiations, as previous reductions to tariffs for wool have applied to all wool imports.

Elimination of the 5.15% tariff on Raw Wool would have represented a \$A9.6 million saving in 2013/14.

Peter Morgan  
Executive Director

cc Chris Kelly, President Australian Council of Wool Exporters and Processors Inc

**Appendix 1**

**Destinations for Australia's Wool Exports by Weight, 2014/15 (to April)**

| <i>Australian Wool Industries Secretariat Inc.</i>                        |                    |                   |                  |              |              |  |                    |                |                    |             |
|---|--------------------|-------------------|------------------|--------------|--------------|--|--------------------|----------------|--------------------|-------------|
| ABN 30 454 304 967<br>Unit 9, 42-46 Vella Drive<br>SUNSHINE WEST VIC 3020 |                    |                   |                  |              |              | Reg. No. A0041776E<br>Telephone: 61 3 9311 0103<br>Facsimile: 61 3 9311 0138 |                    |                |                    |             |
| Exports of Australian wool in kg for period July 2014 to April 2015       |                    |                   |                  |              |              |  |                    |                |                    | 5 June 2015 |
| Country   | Greasy             | Scoured           | Carbonised       | Carded       | Top          | Noil/Waste   | YTD Total          | As a %         | Prev Year          | % Change    |
| China   | 208,236,437        | 1,525,010         | 440,463          |              |              |  | 210,201,909        | 76.15%         | 197,503,069        | 6.4%        |
| India   | 16,469,104         | 799,562           | 96,875           |              |              | 59,236   | 17,424,777         | 6.31%          | 19,434,459         | -10.3%      |
| Czech Republic  | 13,074,285         |                   |                  |              |              |  | 13,074,285         | 4.74%          | 12,451,333         | 5.0%        |
| Italy   | 10,719,430         | 842,637           | 524,410          |              |              |  | 12,086,477         | 4.38%          | 12,846,099         | -5.9%       |
| Korea   | 181,190            | 58,728            | 5,741,071        |              |              |  | 5,980,989          | 2.17%          | 4,865,778          | 22.9%       |
| Malaysia  | 1,367,423          | 3,991,390         | 10,403           |              |              |  | 5,369,216          | 1.95%          | 4,549,411          | 18.0%       |
| Egypt   | 2,254,865          | 159,039           |                  |              |              |  | 2,413,904          | 0.87%          | 2,973,858          | -18.8%      |
| Taiwan  | 2,300,061          |                   | 20,811           |              |              |  | 2,320,872          | 0.84%          | 2,267,134          | 2.4%        |
| Thailand  | 136,667            | 1,311,444         |                  |              |              |  | 1,448,111          | 0.52%          | 653,819            | 121.5%      |
| Japan   | 13,609             |                   | 1,061,186        |              |              |  | 1,074,795          | 0.39%          | 858,645            | 25.2%       |
| USA   | 848,562            | 185,838           | 32,753           |              | 2,448        |  | 1,069,601          | 0.39%          | 832,992            | 28.4%       |
| Germany   | 588,979            | 58,881            | 120,605          |              |              |  | 768,465            | 0.28%          | 441,392            | 74.1%       |
| United Kingdom  | 19,693             | 609,681           | 109,722          |              |              | 8,320  | 747,416            | 0.27%          | 1,118,117          | -33.2%      |
| Iran  |                    | 625,000           |                  |              |              |  | 625,000            | 0.23%          | 175,000            | 257.1%      |
| Lithuania   |                    | 307,945           |                  |              |              |  | 307,945            | 0.11%          | 140,660            | 118.9%      |
| Mexico  |                    | 98,084            | 157,402          |              |              |  | 255,486            | 0.09%          | 187,241            | 36.4%       |
| Turkey  |                    | 26,846            | 86,946           |              |              |  | 113,792            | 0.04%          | 80,077             | 42.1%       |
| New Zealand   | 49,081             |                   | 50,003           | 1,534        |              |  | 100,618            | 0.04%          | 247,159            | -59.3%      |
| Hong Kong   |                    |                   | 73,868           |              |              |  | 85,902             | 0.03%          |                    |             |
| United Arab Emirates  | 0                  | 75,000            |                  |              |              |  | 75,000             | 0.03%          | 650,000            | -88.5%      |
| Mauritius   | 12,158             |                   | 51,416           |              |              |  | 63,574             | 0.02%          | 55,100             | 15.4%       |
| South Africa  | 61,800             |                   |                  |              |              |  | 61,800             | 0.02%          | 71,050             | -13.0%      |
| Spain   |                    | 60,000            |                  |              |              |  | 60,000             | 0.02%          | 103,864            | -42.2%      |
| French Antilles   |                    | 55,510            | 4,305            |              |              |  | 59,815             | 0.02%          | 14,194             | 321.4%      |
| Pakistan  |                    | 13,258            | 38,780           |              |              |  | 52,038             | 0.02%          | 84,339             | -38.3%      |
| Tunisia   |                    |                   | 41,438           |              |              |  | 41,438             | 0.02%          |                    |             |
| Argentina   | 40,058             |                   |                  |              |              |  | 40,058             | 0.01%          | 62,206             | -35.6%      |
| Canada  | 13,394             |                   | 26,406           |              |              |  | 39,800             | 0.01%          | 26,276             | 51.5%       |
| Switzerland   | 19,981             | 15,000            |                  |              |              |  | 34,981             | 0.01%          | 15,419             | 126.9%      |
| Mali  | 21,495             |                   |                  |              |              |  | 21,495             | 0.01%          |                    |             |
| Peru  | 10,321             |                   |                  |              |              |  | 10,321             | 0.00%          | 18,191             | -43.3%      |
| Vietnam   |                    |                   |                  |              | 646          |  | 646                | 0.00%          |                    |             |
| Georgia   |                    |                   |                  |              |              |  |                    |                | 318,826            | -100.0%     |
| Singapore   |                    |                   |                  |              |              |  |                    |                | 70,509             | -100.0%     |
| Senegal   |                    |                   |                  |              |              |  |                    |                | 38,769             | -100.0%     |
| Belgium-Luxembourg  |                    |                   |                  |              |              |  |                    |                | 30,400             | -100.0%     |
| Greece  |                    |                   |                  |              |              |  |                    |                | 20,339             | -100.0%     |
| Ethiopia  |                    |                   |                  |              |              |  |                    |                | 20,202             | -100.0%     |
| Cameroon  |                    |                   |                  |              |              |  |                    |                | 18,243             | -100.0%     |
| Myanmar, Republic of  |                    |                   |                  |              |              |  |                    |                | 12,477             | -100.0%     |
| Albania   |                    |                   |                  |              |              |  |                    |                | 12,467             | -100.0%     |
| Portugal  |                    |                   |                  |              |              |  |                    |                | 5,803              | -100.0%     |
| Chile   |                    |                   |                  |              |              |  |                    |                | 1,307              | -100.0%     |
| Lebanon   |                    |                   |                  |              |              |  |                    |                | 181                | -100.0%     |
| <b>Totals</b>   | <b>256,438,593</b> | <b>10,818,853</b> | <b>8,688,862</b> | <b>1,534</b> | <b>3,094</b> | <b>79,590</b>  | <b>276,030,526</b> | <b>100.00%</b> | <b>263,276,404</b> | <b>4.8%</b> |
| As a % of Total   | 92.9%              | 3.9%              | 3.1%             | 0.0%         | 0.0%         | 0.0%   | 100.0%             |                |                    |             |

Figures are in actual Kgs exported in individual classifications: Prepared by AWIS from source data supplied by Australian Bureau of Statistics  
No warranty is given as to the accuracy or reliability and no responsibility is taken for any errors or omissions

Australian exports of Wool Top by ABS classification:  
 Top 2,448  
 Top not else where specified  
 Combed wool in fragments 646  
 Total Top exported in actual kilograms 3,094

**Appendix 1I**

**Destinations for Australia's Wool Exports by Value, 2014/15 (to April)**

*Australian Wool Industries Secretariat Inc.*

ABN 30 454 304 967  
Unit 9, 42-46 Vella Drive  
SUNSHINE WEST VIC 3020

Reg. No. A0041776E  
Telephone: 61 3 9311 0103  
Facsimile: 61 3 9311 0138

Exports of Australian wool in \$'000 for period July 2014 to April 2015

5 June 2015

| Country                | Greasy           | Scoured        | Carbonised    | Carded      | Top         | Noil/Waste  | YTD Total        | As a %         | Prev Year        | % Change    |
|------------------------|------------------|----------------|---------------|-------------|-------------|-------------|------------------|----------------|------------------|-------------|
| China                  | 1,521,576        | 10,022         | 4,984         |             |             |             | 1,536,582        | 72.30%         | 1,468,599        | 4.6%        |
| India                  | 127,269          | 8,109          | 1,070         |             |             | 39          | 136,487          | 6.42%          | 145,950          | -6.5%       |
| Italy                  | 110,550          | 8,074          | 5,717         |             |             |             | 124,341          | 5.85%          | 134,867          | -7.8%       |
| Czech Republic         | 95,330           |                |               |             |             |             | 95,330           | 4.49%          | 88,441           | 7.8%        |
| Korea                  | 1,733            | 698            | 61,136        |             |             |             | 63,566           | 2.99%          | 49,725           | 27.8%       |
| Malaysia               | 11,282           | 44,703         | 125           |             |             |             | 56,110           | 2.64%          | 52,531           | 6.8%        |
| Egypt                  | 20,253           | 1,649          |               |             |             |             | 21,902           | 1.03%          | 26,248           | -16.6%      |
| Taiwan                 | 17,452           |                | 220           |             |             |             | 17,672           | 0.83%          | 18,253           | -3.2%       |
| Thailand               | 1,144            | 16,266         |               |             |             |             | 17,411           | 0.82%          | 8,738            | 99.2%       |
| Japan                  | 187              |                | 10,987        |             |             |             | 11,174           | 0.53%          | 8,553            | 30.6%       |
| USA                    | 5,425            | 1,997          | 363           |             | 101         |             | 7,886            | 0.37%          | 5,638            | 39.9%       |
| United Kingdom         | 189              | 6,375          | 1,232         |             |             | 19          | 7,815            | 0.37%          | 12,234           | -36.1%      |
| Germany                | 5,718            | 613            | 1,235         |             |             |             | 7,565            | 0.36%          | 4,420            | 71.1%       |
| Iran                   |                  | 7,219          |               |             |             |             | 7,219            | 0.34%          | 2,491            | 189.8%      |
| Lithuania              |                  | 3,424          |               |             |             |             | 3,424            | 0.16%          | 1,618            | 111.6%      |
| Mexico                 |                  | 961            | 1,490         |             |             |             | 2,452            | 0.12%          | 1,642            | 49.3%       |
| Turkey                 |                  | 295            | 968           |             |             |             | 1,263            | 0.06%          | 846              | 49.3%       |
| United Arab Emirates   | 1                | 1,006          |               |             |             |             | 1,006            | 0.05%          | 8,776            | -88.5%      |
| Hong Kong              |                  |                | 867           |             |             | 9           | 877              | 0.04%          |                  |             |
| Mauritius              | 158              |                | 623           |             |             |             | 782              | 0.04%          | 612              | 27.7%       |
| South Africa           | 737              |                |               |             |             |             | 737              | 0.03%          | 362              | 103.8%      |
| New Zealand            | 234              |                | 397           | 21          |             |             | 652              | 0.03%          | 1,459            | -55.3%      |
| French Antilles        |                  | 499            | 42            |             |             |             | 541              | 0.03%          | 135              | 299.5%      |
| Tunisia                |                  |                | 517           |             |             |             | 517              | 0.02%          |                  |             |
| Pakistan               |                  | 130            | 342           |             |             |             | 472              | 0.02%          | 614              | -23.1%      |
| Argentina              | 401              |                |               |             |             |             | 401              | 0.02%          | 576              | -30.3%      |
| Spain                  |                  | 382            |               |             |             |             | 382              | 0.02%          | 776              | -50.7%      |
| Switzerland            | 124              | 146            |               |             |             |             | 270              | 0.01%          | 218              | 23.8%       |
| Canada                 | 62               |                | 203           |             |             |             | 266              | 0.01%          | 151              | 76.3%       |
| Mali                   | 157              |                |               |             |             |             | 157              | 0.01%          |                  |             |
| Peru                   | 49               |                |               |             |             |             | 49               | 0.00%          | 58               | -15.4%      |
| Vietnam                |                  |                |               |             | 27          |             | 27               | 0.00%          |                  |             |
| Georgia                |                  |                |               |             |             |             |                  |                | 3,221            | -100.0%     |
| Singapore              |                  |                |               |             |             |             |                  |                | 641              | -100.0%     |
| Senegal                |                  |                |               |             |             |             |                  |                | 277              | -100.0%     |
| Belgium-Luxembourg     |                  |                |               |             |             |             |                  |                | 228              | -100.0%     |
| Greece                 |                  |                |               |             |             |             |                  |                | 183              | -100.0%     |
| Ethiopia               |                  |                |               |             |             |             |                  |                | 170              | -100.0%     |
| Albania                |                  |                |               |             |             |             |                  |                | 90               | -100.0%     |
| Cameroon               |                  |                |               |             |             |             |                  |                | 83               | -100.0%     |
| Chile                  |                  |                |               |             |             |             |                  |                | 78               | -100.0%     |
| Myanmar, Republic of   |                  |                |               |             |             |             |                  |                | 62               | -100.0%     |
| Portugal               |                  |                |               |             |             |             |                  |                | 55               | -100.0%     |
| Lebanon                |                  |                |               |             |             |             |                  |                | 8                | -100.0%     |
| <b>Totals</b>          | <b>1,920,031</b> | <b>112,568</b> | <b>92,520</b> | <b>21</b>   | <b>128</b>  | <b>67</b>   | <b>2,125,336</b> | <b>100.00%</b> | <b>2,049,627</b> | <b>3.7%</b> |
| <b>As a % of Total</b> | <b>90.3%</b>     | <b>5.3%</b>    | <b>4.4%</b>   | <b>0.0%</b> | <b>0.0%</b> | <b>0.0%</b> | <b>100.0%</b>    |                |                  |             |

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