



JAEPA SUBMISSION

Joint Standing Committee on Treaties

August 2014

EXECUTIVE SUMMARY

The Australian Chamber of Commerce and Industry (ACCI) welcomes the recent conclusion of negotiations on the Japan-Australia Economic Partnership Agreement (JAEPA). As is the case for other recent trade negotiations presently awaiting entry into force, ACCI looks forward to working with business and government to make this agreement a success going forward.

The Japan-Australia Economic Partnership Agreement (JAEPA) is a high-quality treaty text, and represents a significant step in our region towards liberalised trade between our two economies. The National Interest Analysis (NIA) released by the Department of Foreign Affairs and Trade (DFAT) estimates that Japan's agricultural market represents \$4.0 billion of value to Australia alone – or up to 10 per cent of Australia's agricultural exports. In light of the size of this market, we believe any reduction on tariffs for Australian agricultural goods is an achievement to be applauded, with the potential to generate significant positive impacts for our economy over time. The NIA indicates Energy and Minerals will also enjoy access to a substantial drop in tariffs under JAEPA, most occurring on entry into force, and the remainder being eliminated within ten years. Notable amongst the tariff reductions cited by the NIA:

- Tariffs on Australia's energy and mineral exports to be eliminated within ten years, most on entry into force.
- Elimination of the 15 per cent tariff on bottled wine over 7 years.
- Immediate and preferential duty-free access for milk protein concentrates, lactose and casein.
- Fast tariff elimination on the vast majority of Australia's fruit, vegetables, nuts and juice.
- Immediate tariff elimination on lobsters, crustaceans and shellfish.
- Immediate duty-free and quota free access for wheat for feed and barley for feed.
- Immediate tariff elimination and reduced levies for high polarity (international standard) raw sugar.

Likewise, ambitious investment provisions in JAEPA offer Australian business a greatly improved range of market access, which again represents an opportunity for Australian business over time, and a potential source of domestic growth as liberalised trade between the two partners takes gradual effect. JAEPA will also offer much needed enhancements to market access for Australian service suppliers particularly in the areas of financial services, legal services, education and communications.

Key to the success of JAEPA will be ensuring that exporters of goods and services know how to make use of the agreement, via clear, unambiguous procedures that co-opt existing business practices, and which allow disputes at the border-crossing to

be resolved in commercially responsive time frames. As each preferential trade agreement has its own set of these, it is incumbent on negotiators to ensure that the processes and procedures are harmonised and use a common standard (such as available through the Revised Kyoto Convention on Simplification and Harmonisation of Customs Procedures) in order to avoid exacerbating the “noodle bowl” of divergent and overlapping agreements when commercial business is engaged in global supply chains.

Prime Minister Tony Abbott recently commented at the B20 Summit in Sydney:

G20 countries’ growth strategies are about maximising global growth by agreeing to drive growth and reform at home. On Saturday, G20 trade ministers will meet and they will receive your recommendations. I hope that you will remind them that the critical test of trade policy is whether it helps business in the real world. We need to lose the mercantilist view that a ‘concession’ in trade negotiations can only be granted for something given in return. Trade liberalisation is worth doing, even unilaterally, because free trade means more efficiency; more efficiency means more wealth; more wealth means more jobs. That is the message that Australia will bring to the G20 leaders’ meeting in Brisbane in November. Production now takes place through global value chains. Products are no longer made in any one country – they are made in the world – so our approach to trade does need to adjust. The ability to import matters as much as the ability to export and the ability to move goods around matters more than ever.¹

We agree with the Prime Minister, particularly regarding the practical outcomes required of Australian preferential trade agreements if they are to reach their stated goals. As we made clear in our recent submission to the JSCOT regarding the Korea-Australia Free Trade Agreement (KAFTA), Australia could negotiate the best trade agreements in the world, but their value will be limited unless the Australian Government ensures that Australian businesses know how to use them and provides appropriate “after sales service” to ensure that the agreement is providing the envisaged benefits to the commercial users. To assist in this regard, the operation of the JAEPA should have oversight by the Productivity Commission, coupled with regular public release of utilisation data for trade occurring under JAEPA is necessary to ensure the agreement achieves its stated goals.

¹ Prime Minister Tony Abbott, Address to B20 Summit, Sydney 17 July 2014
<<https://www.liberal.org.au/latest-news/2014/07/17/prime-minister-address-b20-summit-sydney>>

RECOMMENDATIONS SUMMARY

No.	Recommendation
1	Australia should develop a 'model' Preferential Trade Agreement based on international standards that is fully transparent to Australian Industry and to international Governments, so that all stakeholders are aware of what Australia sees as the ideal outcome from a PTA. The template would be used as a basis for all future negotiations, and will drive a level of consistency and improved confidence as to what is included in the negotiations. Such a model should reference the 2006 Revised Kyoto Convention on Simplification and Harmonisation of Customs Procedures.
2	The National Interest Analysis for preferential trade agreements should be conducted by an independent body, preferably the Productivity Commission, in the interests of providing frank and fearless assessment for all stakeholders as to the benefits and limitations of proposed preferential trade treaties.
3	Australia and Japan should negotiate an Article to be inserted in the Rules of Origin chapter in JAEPA that specifically defines how and when exporters, importers, and Customs administrations are to address appeals and disputes in relation to preference claims, within a commercially responsive timeframe. Such an Article should detail Customer Service Obligations so that industry can understand the timeframes for resolution of any matters concerning the granting of preferential treatment for goods.
4	A sub-committee should be active for the Chapter 13 objectives, particularly with regard to Paperless Trade Administration. As is the case for the sub-committees identified in other chapters, the sub-committee for electronic commerce would report back to the Joint-Committee.
5	That a review of each negotiation outcome be conducted by an independent body, such as the Productivity Commission, before PTAs are considered by the Parliament to ensure that the national interest has been served by the negotiation outcome.
6	That the Government support the establishment of a National Centre for International Trade Policy to support and consider issues of trade policy and trade liberalisation. Such a Centre could also include a system of accredited advisers from industry who are able to directly assist with trade liberalisation negotiations.
7	That the Government publish information about the utilisation rate for each of Australia's PTAs on an annual basis to ensure that the nation is maximising the opportunities available through each trade agreement.

**The Australian Chamber of Commerce and Industry
is the leading voice of business in Australia**

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1. PROCEDURAL CONSISTENCY ACROSS AUSTRALIA'S PTA

The Australian Chamber of Commerce and Industry (ACCI) welcomes the Japan-Australia Economic Partnership Agreement (JAEPA). The agreement provides significant benefits to a number of internationally engaged sectors and businesses. We however note that not all sectors and products are covered and we hope that these omissions may be able to be addressed in the Transpacific Partnership Agreement negotiations which are still to be completed and will include Australia and Japan among other partners.

We note that JAEPA provides exporters with two options to access the trade agreement in relation to exporting “originating” goods under article 3.2 (Arts 3.15 and 3.16): the customary Certificates of Origin system familiar to trade going across multiple trading zones that is already in use by Australian exporters, or a new system adding to the growing documentary pile for business, the undefined “JAEPA Origin Certification Document”. Our previous submissions to JSCOT on the Korea-Australia FTA (KAFTA) highlighted that KAFTA also contained a KAFTA-specific document that unnecessarily duplicated the function of the ordinary Certificate of Origin, and again in JAEPA we see a further new document that is divergent and not compatible beyond the trade zone. This is inconsistent with the statement by Prime Minister Abbott that *Production now takes place through global value chains. Products are no longer made in any one country – they are made in the world – so our approach to trade does need to adjust.*

While Australian and Japanese products do trade only bilaterally in some cases, increasingly these goods are components of global supply chains with the goods trade including other trade partners either within the supply chain between Australia and Japan or with neither Australia nor Japan as the end market. It is essential that the documents required for any bilateral or regional agreement compliance, are also the same documents as are required for global supply chains in order to ensure a minimum amount of administrative burden.

As we noted in our submission on the KAFTA, we are concerned that the word “Certification” is used in the title of the “JAEPA Origin Certification Document”, when no “certification” actually takes place – unlike the process for a Certificate of Origin. This alone will create nomenclature issues between JAEPA, trade financiers and global supply chains.

Under international standards supported by the World Trade Organisation and World Customs Organisation, customary international law and Trade Finance principles, a *Certificate of Origin* requires a process of issuing Governments certification. Commonly, this is performed by a third-party government-authorized agency, to an internationally accepted standard (in Australia's case, *ISO 17020* standard under the administration of JAS-ANZ), which in turn provides commercial

trust and confidence to the trade transaction for all parties and stakeholders involved in the trade (ie producer, exporter, importer, importing Customs and importing Revenue Office, banks via Letters of Credit requirements, etc). The “JAEP A Origin Certification Document” is a clear deviation from these international trade documentation standards and procedure and creates the false impression as to the trust value of this document.

The “JAEP A Origin Certification Document” also represents an extra hurdle to business when trying to engage with multiple trade agreements in a global supply chain – consistency in documentary requirements enables smoother supply-chain crossings over different trade zones, and therefore reduced business costs. The agreement should simply require the usual Certificate of Origin system familiar to exporters who engage in ordinary MFN trade, and which has been previously successfully implemented in Australian trade agreements such as ASEAN-Australia New Zealand Free trade Agreement (AANZFTA). In this way, pre-existing common business practice in Australia would be co-opted for access to the JAEP A, rather than diverted.

We also note that it appears that negotiations focus on the documentary requirements but not the customs handling procedure. It would be of great benefit to business if the negotiations were based on the accepted certificate of origin process and that these are attested by the Government of the supplier. This means that Customs in the nation of the buyer should have regard for this process and only seek to examine claims for preference on a risk based approach. This would mean that the vast majority of goods would pass the border of the “free trade” partner unimpeded as they are travelling with an “Australian passport for goods” in the form of an official **Australian Government certificate of origin** and vice versa. At present in many countries, all claims for preference are examined and so reduce trade efficiency across the borders.

Our position on preferential trade agreements – and their potential for success – is based on the practical questions arising from the type of issues Australian exporters face every day when engaging in trade, and how an exporter takes advantage of the preferences conferred in the treaty. This leads to simple questions such as:

- How does a company make a claim for preference?
- What happens to the Australian exporter when a valid claim is unfairly rejected?
- Who represents the exporter?
- What are the agreed timeframes for commercially responsive dispute resolution of the exporter’s claim for preference, so that additional costs are not incurred?
- Who bears liability for costs and loss if the exporter’s claim was perfectly valid but an administrative oversight causes a delay?
- What prevents non-party goods from being claimed?

- What prevents criminal networks from seeking to utilise the PTA?

Trade documentation and procedures have, over centuries, become international customary standards recognised by international practice, precisely because they answer these questions. The Certificate of Origin is the result of hundreds of years of precedent, exporter expectation, financier expectation, and importing Customs expectation. Creating a new species of procedures and standards in each new preferential trade agreement, however, makes processes opaque for Australian companies engaged in international trade and exposes them to greater risk when conducting trade. It also raises the possibility of fraudulent behaviour that will be harder to monitor, and provides avenues for non-party goods entering the trade zone, raising also the possibility of reputational risk for Australian produce. It is these risks to exporters about which we are concerned.

Australia has now negotiated nine PTAs, either bilateral or regional, and has another nine under negotiation. Each one of these so far has contained a different set of rules and procedures for their use. ACCI agrees strongly with the Prime Minister regarding the direction Australia should be taking towards world trade, as the Chamber movement is part of an international push to finalise the Doha Round of multilateral trade talks and to implement the 2013 WTO agreement on Trade Facilitation. If bilateral trade agreements such as JAEPA are interim measures or 'building blocks' on the path to an eventual agreement at the multilateral level, then procedures for traders contained within these types of agreements must be harmonised in order to facilitate trade now, and under a future multilateral deal.

Recommendation 1:

Australia should develop a 'model' Preferential Trade Agreement based on international standards that is fully transparent to Australian Industry and to international Governments, so that all stakeholders are aware of what Australia sees as the ideal outcome from a PTA. The template would be used as a basis for all future negotiations, and will drive a level of consistency and improved confidence as to what is included in the negotiations. Such a model should reference the 2006 Revised Kyoto Convention on Simplification and Harmonisation of Customs Procedures.

2. NATIONAL INTEREST ANALYSIS TO BE CONDUCTED BY INDEPENDENT ANALYSIS

ACCI calls for the National Interest Analysis document to be prepared by a party other than the Department of Foreign Affairs and Trade (DFAT). The reasons for this are simple but legion. Australian business, and indeed all Australian stakeholders from diverse ends of the political spectrum, need the benefit of frank and fearless economic advice provided by an independent body in order to properly assess the outcomes from finalised preferential trade treaty negotiations once concluded but

before a trade agreement enters into force. Presently, this assessment is developed within DFAT and is not necessarily at arm's length. As noted by the Prime Minister, the test of the quality of an agreement is its use by business. ACCI understands that it is necessary for limited transparency during trade agreement negotiations with other parties – and indeed we have argued in our earlier submissions to JSCOT that an “accredited advisor scheme” aligned to negotiations (possibly similar to the US model) would result in better outcomes for trade liberalisation objectives.

Once in force, it is essential that the Government maintain a regular oversight to determine if the expected benefits are in fact eventuating and utilisation is high. Should constraints be identified then commercially relevant corrective actions need to be undertaken to create a “living agreement”. It is important for there to be an “after-sales service” aspect to Australia's trade agreements, which remain alive into the future. There must be a continued work program to ensure the agreements are working for Australian business.

Recommendation 2:

The National Interest Analysis for preferential trade agreements should be conducted by an independent body, preferably the Productivity Commission, in the interests of providing frank and fearless assessment for all stakeholders as to the benefits and limitations of proposed preferential trade treaties.

3. COMMERCIALY RESPONSIVE APPEAL MECHANISM FOR GOODS CROSSING THE BORDER

ACCI notes that Chapter 3 (the mechanism by which exporters are to access the preferential agreement) has no commercially responsive dispute mechanism laid out for when the tariff concession is to be given to goods by importing Customs at the border crossing, but is unfairly denied. Chapter 4 on Customs Procedures contains vague but ultimately non-binding provisions that require Customs to make judicial review ‘easily accessible’, but does not define these parameters properly. The only solid dispute settlement instrument appears to vaguely function at Chapter 19, requiring the formation of a full arbitral tribunal – but the expense would outweigh the tariff concession foregone. ACCI knows from the present operation of Australia's other preferential trade agreements (TAFTA, AANZFTA, SAFTA etc) that tariff concessions are small enough not to warrant the excess of preparing an arbitral tribunal, but large enough to discourage trade should they be unfairly denied by importing Customs. The success of JAEPA relies on both Australia and Japan agreeing on a proper, well-defined process to manage tariff concession disputes – and that process should be agreed explicitly in the treaty itself.

If exporters and importers feel that they will be unable to dispute an unfair rejection of their tariff claim under JAEPA, they will likely avoid bothering to use the agreement. And yet we note JAEPA is silent on situations in which an exporter and

an importer make a valid claim for preferential treatment via an “Origin Certification Document” under JAEPA, and that valid claim is unfairly rejected by importing Customs. There is no commercially responsive system of support for the validity of the claim by the exporter or the importer, when goods may be sitting on the dock waiting to cross the border.

In some instances, making a false or fraudulent claim can also result in additional corrective actions being taken by the relevant authorities. Therefore it is essential that the commercial users of JAEPA have appropriate due diligence tools to support their claims for preference. Such tools should include a third party issued certificate of origin, as is the case for most non-preferential trade occurring outside JAEPA, and a commercially responsive dispute settlement mechanism for tariff concession claims that are in dispute.

Recommendation 3:

Australia and Japan should negotiate an Article to be inserted in the Rules of Origin chapter in JAEPA that specifically defines how and when exporters, importers, and Customs administrations are to address appeals and disputes in relation to preference claims, within a commercially responsive timeframe.

Such an Article should detail Customer Service Obligations so that industry can understand the timeframes for resolution of any matters concerning the granting of preferential treatment for goods.

4. CHAPTER 13: ELECTRONIC COMMERCE ALLOCATED A SUB-COMMITTEE

ACCI notes the sub-committees for the Technical Regulations, Standards and Conformity Assessment, and the Sanitary and Phytosanitary Cooperation chapters. However, the growth of electronic commerce – particularly in relation to the objectives at Chapter 13 Article 13.9 for Paperless Trade Administration – should be the subject of a sub-committee reporting to the Joint Committee under Chapter 1 Article 1.1. The explosive growth of innovative software solutions to better enable trade needs to be part of the general work of the sub-committee level, and one which the Japan-Australia Economic Partnership Agreement should be able to adapt to. It makes sense to have oversight and an ongoing programme of work to achieve the future completely electronic transaction of trade administration, particularly in light of emerging calls for Authorised Economic Operator schemes, and Port Community Systems currently being discussed in the Australian trading context.

Recommendation 4:

A sub-committee should be active for the Chapter 13 objectives, particularly with regard to Paperless Trade Administration. As is the case for the sub-committees

identified in other chapters, the sub-committee for electronic commerce would report back to the Joint-Committee.

5. INDUSTRY CONSULTATION AND INDEPENDENT ASSESSMENT OF PERFORMANCE

ACCI has argued for the ongoing oversight and transparency in the operation of Australia's free trade agreements – including JAEPA. Australia's trade agreements must be subjected to independent assessment in the public sphere, both prior to ratification after negotiations have concluded and periodically after implementation, in order to allow for appropriate economic assessment to occur to ensure maximum economic benefit is being achieved. Each trade agreement should also contain a basic requirement for all parties to collect and share data on the utilisation rates of the agreement once it is in force. This has not been a compulsory requirement in Australia's previous trade treaties previously, and as a result it remains impossible for transparent and accurate domestic assessment of the performance of trade flows falling under a trade agreement, let alone for better domestic economic reforms resulting from the agreement, and most importantly for appropriate tailoring of outreach programs to business.

Part of the requirement for greater transparency and independent consultation should be the formal inclusion of a system of "accredited advisers", sourced from industry representatives and other stakeholders. We envision such a system would be similar to the United States' accredited adviser committee arrangements, which have been managed by the Office of the United States Trade Representative since 1974.²

ACCI suggests that as the current Government has a strong forward program on trade liberation, it should be supported by a new National Centre for International Trade Policy. Under this model, industry groups, academia and the Productivity Commission would be included directly in the negotiation process. In order to assist with broader transparency to reduce suspicion about what is actually being negotiated, the Government should develop a publicly available 'hypothetical model' of what it sees as an ideal 21st century agreement.

We note the Productivity Commission has recommended numerous times in its previous reports that this step be included in negotiations:

Productivity Commission – Trade & Assistance Review 2011-12 (p. 111):

Current processes for assessing and prioritising BRTAs [Bilateral and Regional Trade Agreements] lack transparency and tend to oversell the likely benefits. To help ensure that any further BRTAs entered into are in Australia's interests:

² USTR Office of Intergovernmental Affairs & Engagement (IAPE) <<http://www.ustr.gov/about-us/intergovernmental-affairs/advisory-committees>>

- *Pre-negotiation modelling should include realistic scenarios and be overseen by an independent body. Alternative liberalisation options should also be considered.*
- *A full and public assessment of a proposed agreement should be made after negotiations have concluded — covering all of the actual negotiated provisions.*

Productivity Commission – Bilateral & Regional Trade Agreements – November 2010 (p. 311):

As noted...the present JSCOT process cannot be utilised to provide improved information to Cabinet before a decision is made. While JSCOT would still of course be at liberty to undertake its own assessment, it could draw on the already published independent analysis during its considerations, supplementing it with further analysis if it saw fit.³

Furthermore, we argue that once the JAEPA agreement enters into force, the Productivity Commission should annually be provided with the utilisation data, to allow appropriate independent investigation in relation to the operation and success of each PTA. We note the JSCOT concluding response to the Malaysia Australia Free Trade Agreement (MAFTA) 2012 was as follows:

While the Committee welcomes these public consultations, and the subsequent statements to Parliament, it still does not receive the detailed independent analysis it has previously requested.

There appears to be no Government response to the JSCOT MAFTA report – it has been nearly two years pending. The type of independent analysis JSCOT has previously requested is able to be brought about by actual data once a PTA is in operation. The types of hypothetical data that will be presented to JSCOT prior to a PTA entering into force are unfortunately based on a best-case scenario, and it assumes all variables are correct and the PTA functions optimally. The reality is, however, that arms-length, independent analysis is required once the PTA is in existence and operating, to ensure the PTA actually does work and provides benefits to the commercial users along with the nation. The only way to conduct this type of analysis is to mandate the collection and sharing of PTA utilisation data by all parties involved, and have it independently assessed by a group such as the Productivity Commission.

When ACCI has attempted to obtain data from the Australian Customs and Border Protection Service with regard to the gross rates of utilisation of particular trade agreements currently in force, the response has been that the information is unavailable due to commercial confidentiality reasons. Another common response to queries the provision of statistics relating to trade as a whole for the particular export destination, rather than for trade occurring under the PTA. ACCI

³ JSCOT Report 130: Review into Treaty tabled on 14 August 2012
<http://www.aph.gov.au/Parliamentary_Business/Committees/House_of_Representatives_Committees?url=jsct/14august2012/report.htm>

requests that all Australia's future PTA (including JAEPA and KAFTA) contain provisions requiring importing Customs to collect and publish data on the flows of trade occurring under the PTA, in order to appropriately assess their operation, function in improving economic outcomes, and appropriately tailor outreach and administration.

Recommendation 5:

That a review of each negotiation outcome be conducted by an independent body, such as the Productivity Commission, before PTAs are considered by the Parliament to ensure that the national interest has been served by the negotiation outcome.

Recommendation 6:

That the Government support the establishment of a National Centre for International Trade Policy to support and consider issues of trade policy and trade liberalisation. Such a Centre could also include a system of accredited advisers from industry who are able to directly assist with trade liberalisation negotiations.

Recommendation 7:

That the Government publish information about the utilisation rate for each of Australia's PTAs on an annual basis to ensure that the nation is maximising the opportunities available through each trade agreement.

6. TPP IMPLICATIONS

ACCI is aware of the negotiations underway in regards to the Trans-Pacific Partnership Agreement which include Australia and Japan as parties. We are hopeful that the TPP negotiations will provide an opportunity to advance the coverage of liberalised trading arrangements for goods and other sectors which have not achieved the market access arrangements they desired in the JAEPA.

We reinforce our call for consistency across the agreements with Australia's major trading partners in order to reduce the "noodle bowl" of complex trade and compliance arrangements. We hope that TPP might be a means to harmonise some of the existing agreements and recognise the already embedded dominant agreements of NAFTA and AANZFTA. Roll over provisions which recognised goods involved with other agreements across the supply chain would be a major step forward.

This includes acceptance of the existing trade documentation procedures and avoiding the invention of even more novel border crossing arrangements.

As it currently stands, Australian traders have to cope with multiple entry arrangements into a number of markets and TPP and the Regional

Comprehensive Economic Partnership will potentially exacerbate this if they are not used to harmonise the trading arrangements. For example, there are current three border crossing protocols into Malaysia. With TPP and RCEP this will increase to 5 in Malaysia. In the USA it will be three; Thailand four; Japan three.

Many businesses, particularly small and medium businesses, do not have the administrative capacity to investigate, review and comply with numerous protocols. As a result of complex agreements and documentary arrangements utilisation rates of so called “free trade agreements” across Australasia is low. Australian negotiations must seek to improve this situation and avoid additional “red tape” through the cumulative impacts of the ever increasing number of bilateral and regional agreements with our important trading partners and the supply chains around the world.

We also note that the JAEPA does not contain ISDS provisions. It does however contain provisions to review this position and allow for inclusion at a later time. ACCI is relaxed about this as we consider that investors have low risk in both Australia and Japan and can rely, in both cases, on appropriate due process to any dispute issues. Our position is that we support case by case inclusion of ISDS and note that other negotiations such as the TPP may well result in coverage on this issue in both Australia and Japan at the finalisation of negotiations.

- ABOUT ACCI

6.1 Who We Are

The Australian Chamber of Commerce and Industry (ACCI) speaks on behalf of Australian business at a national and international level.

Australia's largest and most representative business advocate, ACCI develops and advocates policies that are in the best interests of Australian business, economy and community.

We achieve this through the collaborative action of our national member network which comprises:

- All eight state and territory chambers of commerce
- 29 national industry associations
- Bilateral and multilateral business organisations.

In this way, ACCI provides leadership for more than 300,000 businesses which:

- Operate in all industry sectors
- Includes small, medium and large businesses
- Are located throughout metropolitan and regional Australia.

6.2 What We Do

ACCI takes a leading role in advocating the views of Australian business to public policy decision makers and influencers including:

- Federal Government Ministers & Shadow Ministers
- Federal Parliamentarians
- Policy Advisors
- Commonwealth Public Servants
- Regulatory Authorities
- Federal Government Agencies.

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 the Fair Work Commission, 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.

ACCI MEMBERS

ACCI CHAMBER MEMBERS: ACT AND REGION CHAMBER OF COMMERCE & INDUSTRY
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COMMERCE & INDUSTRY QUEENSLAND** CHAMBER OF COMMERCE & INDUSTRY
WESTERN AUSTRALIA **NEW SOUTH WALES BUSINESS CHAMBER** TASMANIAN CHAMBER OF
COMMERCE & INDUSTRY **VICTORIAN EMPLOYERS' CHAMBER OF COMMERCE &
INDUSTRY ACCI MEMBER NATIONAL INDUSTRY ASSOCIATIONS:** ACCORD – HYGIENE,
COSMETIC AND SPECIALTY PRODUCTS INDUSTRY **AIR CONDITIONING & MECHANICAL
CONTRACTORS' ASSOCIATION** AUSTRALIAN BEVERAGES COUNCIL **AUSTRALIAN DENTAL
INDUSTRY ASSOCIATION** AUSTRALIAN FEDERATION OF EMPLOYERS & INDUSTRIES
AUSTRALIAN FOOD & GROCERY COUNCIL ASSOCIATION AUSTRALIAN HOTELS
ASSOCIATION **AUSTRALIAN INTERNATIONAL AIRLINES OPERATIONS GROUP** AUSTRALIAN
MADE CAMPAIGN LIMITED **AUSTRALIAN MINES & METALS ASSOCIATION** AUSTRALIAN
PAINT MANUFACTURERS' FEDERATION **AUSTRALIAN RETAILERS' ASSOCIATION**
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AUSTRALIA **HOUSING INDUSTRY ASSOCIATION** LIVE PERFORMANCE AUSTRALIA **MASTER
BUILDERS AUSTRALIA** MASTER PLUMBERS' & MECHANICAL SERVICES ASSOCIATION OF
AUSTRALIA (THE) **NATIONAL BAKING INDUSTRY ASSOCIATION** NATIONAL ELECTRICAL &
COMMUNICATIONS ASSOCIATION **NATIONAL FIRE INDUSTRY ASSOCIATION** NATIONAL
RETAIL ASSOCIATION **OIL INDUSTRY INDUSTRIAL ASSOCIATION** PHARMACY GUILD OF
AUSTRALIA **PLASTICS & CHEMICALS INDUSTRIES ASSOCIATION** PRINTING INDUSTRIES
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AUTOMOBILE CHAMBER OF COMMERCE