



Department for
International Trade

Public consultation on trade negotiations with Australia

Summary of responses

18 July 2019

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Foreword from the Secretary of State for International Trade and President of the Board of Trade



The United Kingdom is on the cusp of a new era in our great trading history. For the first time in nearly 50 years, we will have the freedom to pursue an independent trade policy to build a stronger, fairer and more prosperous country, more open and outward-looking than ever before.

The Government, led by my Department for International Trade, has been preparing for the United Kingdom to have an independent trade policy after we exit the European Union. We have made great strides forward. We have opened 14 informal trade dialogues with 21 countries from the United States to Australia to the United Arab Emirates. We have also been working closely with our existing trading partners to ensure the continuity of European Union trade deals. The United Kingdom's trade with countries with which we are seeking continuity¹ accounted for £139 billion or 11 per cent of the United Kingdom's trade in 2018.²

We have already signed a number of these continuity agreements which replicate the effects of the existing agreements, as far as possible. This includes Switzerland, which is one of our key trading partners and worth 2.3 per cent³ of the United Kingdom's total trade. Other agreements have been signed with Israel, the Palestine Authority, Chile, the Faroe Islands, Eastern and Southern Africa, Caribbean countries, Iceland and Norway, Fiji, Papua New Guinea, Colombia, Peru and Ecuador.⁴ We have also agreed in principle an agreement with Korea which will be signed shortly. In addition to this, we have also signed Mutual Recognition Agreements with Australia, New Zealand and the United States. We will continue to work tirelessly to deliver the maximum possible continuity and certainty for when we leave the European Union.

In addition, we have made significant headway on the United Kingdom's future independent membership of the World Trade Organization: we have submitted our proposed commitments on goods and services; established our own independent trade remedies system (the Trade Remedies Authority); and published the Export Strategy and launched 14 working groups and a number of trade reviews with key partners.

The Government is determined to build a new economic relationship with the European Union. One which sees the United Kingdom leave the Single Market and the Customs Union to seize new trading opportunities around the world, while protecting jobs, supporting growth and maintaining security co-operation. We recognise that our Future Economic Partnership with the European Union will have considerable and immediate implications for the way the United Kingdom can develop its future trade policy, in terms of its trading agreements with the rest of the world. We will continue to listen and respond to our stakeholders' views on this as we develop our own independent trade policy in parallel with the direction of the future relationship negotiations with the European Union.

¹ This excludes Turkey (plus San Marino and Andorra) which is part of a customs union with the European Union, and excludes Japan, as the Economic Partnership Agreement only came into force on 1 February 2019.

² UK total trade: all countries, non-seasonally adjusted, October to December 2018.

³ UK total trade: all countries, non-seasonally adjusted, October to December 2018.

⁴ The trade continuity agreement with Iceland and Norway would only apply in a No Deal scenario. All others would apply after the proposed Implementation period as well.

An independent trade policy means we can negotiate trade agreements specifically tailored to the United Kingdom, building links with old friends and new allies, enabling the United Kingdom to take advantage of emerging sources of growth and to deepen ties with our established partners to create shared and sustainable growth.

In July last year, we launched consultations on new free trade agreements. The consultations demonstrated the United Kingdom's intention to seek free trade agreements with the United States, Australia and New Zealand, as well as the United Kingdom potentially seeking accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP, a plurilateral agreement with 11 existing members).

We have engaged fully with the devolved administrations, and consulted extensively with stakeholders across the business community, civil society, academia and the general public on priorities for trade negotiations to ensure we represent the interests of the whole of the United Kingdom in any future negotiation.

We have received 601,121 responses to the four consultations on future trade agreements. I would like to thank all those who took the time to contribute to this consultation. The Government is committed to an inclusive and transparent trade policy, so today, I am publishing a summary of the consultation responses we received across the four consultations.

A handwritten signature in blue ink, appearing to read 'Liam Fox', with a stylized flourish at the end.

The Rt Hon Dr Liam Fox
Secretary of State for International Trade and President of the Board of Trade

Introduction

Background

1. As the United Kingdom (UK) leaves the European Union (EU), we will have an independent trade policy for the first time in nearly 50 years. This will give us the opportunity to forge new and ambitious trade relationships around the world, and to enter into new Free Trade Agreements (FTAs) with other countries or groups of countries.
2. The Government remains committed to building a deep and special trading partnership with the EU, but through our new independent trade policy, we can also take advantage of shifts in the global economy: According to the IMF, 90 per cent of the world economic growth over the next five years is forecast to come from outside the EU⁵; and 54 per cent of the UK's exports of goods and services are now traded outside the EU⁶, compared with only 46 per cent in 2006.
3. Through negotiating FTAs, we can work with our trading partners around the world to break down barriers to trade in goods and services, ensure that UK businesses are treated fairly, and protect our right to regulate and maintain high standards, creating the conditions for individuals and businesses to prosper. Our ambition is to:
 - Increase economic growth and productivity, through increased trade and investment, promoting greater competition and innovation.
 - Provide new employment opportunities, including higher-skilled jobs, from greater specialisation, increasing wages and opportunity across the UK.
 - Deliver a greater variety of products for consumers at a lower cost while maintaining quality.

Why this Free Trade Agreement?

4. An early priority for the UK's independent trade policy will be to negotiate a comprehensive FTA with Australia. A UK-Australia FTA would further cement our existing bilateral partnership, which is built on our shared heritage and values and extensive people-to-people links. The UK and Australia already enjoy a strong and growing trade relationship, with UK-Australia trade worth £15.3 billion in 2018.⁷ The UK is the third largest investment partner in Australia and the 9th most popular destination for UK Foreign Direct Investment (FDI). Australia is the 13th largest source of FDI in the UK.⁸
5. Australia is also one of our closest allies, sharing the same head of state, HM the Queen, and cooperating extensively across security, prosperity and defence. We are both active supporters of the international rules-based system and the UK works closely with Australia in many multilateral forums including the United Nations (UN), G20, World Trade Organization (WTO) and the Commonwealth. We are both strong advocates of free trade and, at a time of rising

⁵ DIT calculations based on the IMF World Economic Outlook database, updated April 2019.

⁶ Source: ONS Balance of Payments 2019Q1.

<https://www.ons.gov.uk/economy/nationalaccounts/balanceofpayments/datasets/balanceofpayments>

⁷ UK total trade: all countries, non-seasonally adjustment, October to December 2018.

⁸ ONS Foreign direct investment involving UK companies: 2017 (rankings exclude UK offshore territories).

protectionism, our co-operation sends a strong message and provides the opportunity to negotiate the highest quality FTA.

A transparent and inclusive trade policy

6. As set out in the Trade White Paper *Preparing for our future UK trade policy* published in October 2017, the Government is committed to pursuing a trade policy which is inclusive and transparent. To ensure that any future FTA works for the whole of the UK, the Government is therefore committed to seeking views from a broad range of stakeholders from all parts of the UK. In July 2018, the Government published DIT's *approach to engagement for the pre-negotiation phase of trade negotiations* setting out its plan for pursuing new trade negotiations collaboratively by engaging with the widest range of stakeholder groups, as it takes forward its free trade agenda. For new FTAs, we have run broad open consultations. We will continue to engage as widely as possible as we look ahead to negotiations potentially starting soon.
7. On 20 July 2018, the Department for International Trade (DIT) launched four 14-week public consultations seeking views on potential FTAs with the United States (the US), Australia and New Zealand, and potential accession to the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP). To support this, the Government ran a series of events around the UK to promote the consultations. All four consultations closed on 26 October 2018. This document sets out the findings from the responses received.
8. DIT welcomed feedback and comments from all interested parties to the consultations. Across the four consultations, the Government received over 600,000 responses including those submitted by campaigns. They have been analysed and are informing the Government's overall approach to the four potential future trade deals. The consultation feedback will also support the Government in meeting its commitment to delivering a UK trade policy which will benefit the UK economy, and businesses, workers, producers and consumers.
9. While many respondents welcomed the opportunities that an independent trade policy will bring as we leave EU, many respondents also mentioned the importance of the UK's future economic relationship with the EU. We recognise that the UK's future trade policy, including our ability to negotiate FTAs, will depend on the scope and substance of our future economic relationship with the EU. While comments on the UK Government's vision for the Future Economic Partnership (FEP) with the EU were outside the scope of the questions asked in this FTA consultation, they have, however, been included in our analysis.

What we asked

10. Each consultation was based on a series of questions concerning the respondent's priorities and concerns regarding the relevant agreement. The questions were broad to ensure the consultation exercise was inclusive and would encourage participation from a wide range of stakeholders. We received responses from individuals, businesses, business associations, public sector bodies, trade unions and other non-governmental organisations (NGOs). The online survey covered a range of policy areas which are typically included in any comprehensive FTA.

These were:

Tariffs	Rules of Origin (RoO)	Customs Procedures	Services	Digital
Product Standards, Regulation and Certification	Sanitary and Phytosanitary (SPS) Measures	Competition	Government (Public) Procurement	Intellectual Property (IP)
Investment	Labour & Environment	Trade Remedies and Dispute Settlement	Small- and Medium-sized Enterprise (SMEs) Policy	Other

Respondents were also able to submit additional comments not related to the areas listed above. A full list of all the questions asked during this consultation is available in Annex A.

This report

11. This document is a summary of what respondents said in the *consultation on trade negotiations with Australia* (the consultation). The evidence provided from the responses to this consultation (as summarised in this document), will inform the Government's overall approach to our future trading relationship with Australia, including our approach to negotiating any trade agreement. As we look ahead to finalising our negotiating objectives, we will continue to actively consider the consultation feedback to inform this work. Decisions made as a result of this consultation will therefore be published alongside our negotiating objectives before potential negotiations start. This report, therefore, does not set out Government policy with respect to future trade policy, but simply provides a summary of what consultation respondents have told us. The Government will take all responses to this consultation into account. A number of respondents raised points which fell outside the scope of this consultation. However, they have still been included in the statistical analysis.
12. We also received a large number of responses from outside the UK. The views provided in these responses will be analysed carefully and considered.
13. This document does not contain a list of the respondents or contain any personal or organisational details of the respondents. Their views are summarised in the following sections of this report but are not attributed to any individual respondent or business. The figures in this

document refer to those who responded to the consultation, so should not be treated as statistically representative of the public at large.

14. The Government does not intend to publish any individual consultation responses it received. Many organisations have published their own responses independently.
15. DIT commissioned the research agency Ipsos MORI to analyse responses for all four consultations and produce statistical analysis with a summary of the overall findings. This analysis supplements the review of consultation feedback undertaken by the Government. Ipsos MORI developed a code frame to allow for systematic statistical analysis of the responses. The codes within the code frame represent a ‘theme’ based on an amalgamation of responses submitted and are intended to comprehensively represent all responses. The code frame and methodology, produced by Ipsos MORI, have been published alongside this report.

Overview of the responses

16. On the closure of the consultation on a potential UK-Australia trade deal, the Government had received 146,188 responses, submitted via the online survey and by email or post.

Table 1: A breakdown of the overall response numbers

Total number of emails, letters and online survey responses received	146,188
Online survey responses	219⁹
Post	1
Emails [non-campaign]	63
Emails [campaign]	145,905

17. Respondents were categorised into one of the following five groups:
 - **An individual** – Responding with personal views, rather than as an official representative of a business, business association or another organisation.
 - **Business** – Responding in an official capacity representing the views of an individual business.
 - **Business association** – Responding in an official capacity representing the views of a business representative organisation or trade association.

⁹ 220 participants had completed the online response form on the Citizen Space platform, but one response was discounted as it was a duplicate.

- **Non-governmental organisation (NGO)** – Responding in an official capacity as the representative of a non-governmental organisation, trade union, academic institution or another organisation.
- **Public sector body** – Responding in an official capacity as a representative of a local government organisation, public service provider, or another public sector body in the UK or elsewhere.

Online consultation portal

18. The Consultation Portal was hosted by Citizen Space (an online software tool) and contained an online survey with a total of 67 questions. This was tailored to each of the five respondent groups with additional questions for certain groups. The survey for each group asked what areas of an FTA respondents viewed as being priorities and concerns and offered respondents the opportunity to select from across 14 trade policy areas relevant to an FTA. Respondents were also given the opportunity to submit supplementary comments and to raise any other issues. In addition, business respondents and business organisations were asked to select their top priority area and top concern. Respondents could simply answer the online survey questions selecting from the 15 options for priorities and concerns with textboxes available for additional comments. While many respondents chose not to submit additional comments after filling in the questionnaire, these responses are still subject to the same analysis and will be taken into account in developing our policy.
19. Of the 67 questions, there were five general questions for all respondents to answer, 11 specific questions for individuals, ten specific questions for NGOs, 17 questions for businesses, 15 specific questions for business associations and nine specific questions for public sector bodies. See Annex A for the full list of questions asked.
20. Table 2 shows a breakdown of the number of Consultation Portal responses per respondent group.

Table 2: Total Consultation Portal responses broken down by respondent group

Respondent group	Number of responses
Individual	117
Non-governmental organisation (NGO)	27
Business	34
Business association	34
Public sector body	7
TOTAL	219

Respondents' demographic profile

21. The online survey gave respondents the option to provide additional data about themselves or their organisation. This included questions such as their geographical location, age, gender, size of business and the number of businesses the business associations represent. Using this data, we have provided a detailed breakdown of respondents' profiles in Annex B.

Responses via email and post

22. Some respondents opted to submit their responses to the consultation via email. On request, questions from the Consultation Portal survey were made available to respondents. In this case, the majority of respondents submitted a letter with specific comments tailored to the needs and circumstances of their organisation. The table below (see table 3) shows a breakdown of the number of responses by respondent group. Over two thirds of the responses sent via email were from business and industry.

Table 3: Total number of email responses broken down by respondent group

Respondent group	Number of responses
Individual	5
Non-governmental organisation (NGO)	12
Business	5
Business association	35
Public sector body	6
TOTAL	63

23. One response was submitted by post from an NGO.

Campaign responses

24. A campaigning group (38 Degrees) organised and actively encouraged responses from its members to the consultation. Nearly 150,000 responses were submitted.

Table 4: Breakdown of the number of campaign responses

Campaigning Organisation	Number of Responses	Title of Campaign
38 Degrees	145,905	<i>Submission to DIT's consultation on future trade deals</i>

25. We have not categorised responses in any way other than how they were received. In the summary of responses section of this document, which summarises the detailed comments received by respondents, responses have been considered in the relevant policy area where they would be in a typical FTA.

Consultation feedback

Consultation events

26. As part of DIT's work to promote all four consultations, we held 12 'Town Hall' and roundtable events across the UK, seeking views from a broad range of stakeholders. Additionally, the Minister of State for Trade Policy, George Hollingbery MP, chaired a webinar (openly advertised on Twitter) with over 100 people registering. The webinar was specifically designed to discuss FTAs with specific relevance to how Small- and Medium-sized enterprises (SMEs) operate.

Table 5: Location, date and partner organisation of each event

Location	Date	Partner Organisation
Edinburgh	5 September 2018	The Scottish Council for Development and Industry
Manchester	21 September 2018	British American Business
Exeter	28 September 2018	Confederation of British Industry
Birmingham	1 October 2018	British American Business
Norwich	3 October 2018	Confederation of British Industry
Belfast	4 October 2018	Invest Northern Ireland
London	5 October 2018	Confederation of British Industry
Nottingham	8 October 2018	Geldards
Durham	10 October 2018	British Chambers of Commerce
Leeds	12 October 2018	Trades Union Congress
Cardiff	15 October 2018	British Chambers of Commerce
Reading	17 October 2018	Federation of Small Businesses
Webinar	22 October 2018	Federation of Small Businesses

27. The events were intended to encourage individuals and businesses from all parts of the UK to participate in the consultations. We partnered with leading business associations and other representative organisations to host these events with each event adapting to meet the needs and interests of the registered attendees. In total, there were over 300 attendees with a broad spectrum of trade policy interests.

28. The events were chaired by either the Secretary of State, a minister or a senior official from DIT. Leading country and policy team experts from the department were also available to answer questions. These events allowed us to hear first-hand from a range of experts from across business, trade unions, NGOs, consumer groups and other civil society representatives. Events were held under the Chatham House Rule, with comments not attributed to stakeholders. This facilitated an open and honest discussion. Feedback from attendees was positive with the events being reported as informative and valuable.
29. From these events, we gathered the following feedback to all four consultations:
- Appetite for engagement was high. Stakeholders valued the opportunity for a genuine dialogue with ministers and senior officials, an opportunity to exchange views, gather information and to be involved in the policy-making process.
 - Stakeholders welcomed the Government's commitment to an inclusive and transparent trade policy and asked for this transparency to continue throughout the negotiation process. They requested more digital content on trade to be made available, and for the Department to signpost main issues to assist them accessing pertinent information.
 - Levels of general knowledge of FTAs were mixed.
 - Many businesses were engaged but were open about the fact that the FEP with the EU and EU-Exit contingency planning was their main focus. This was consistently seen as the more immediate priority for business.
30. Understanding of FTAs varied across different stakeholder groups, with there being mixed levels of awareness about the impact of trade deals and their wider benefits to the general public. DIT recognises the need to raise awareness of future FTAs and their impact at both local and national level. The insights gained from these events will inform DIT's stakeholder engagement plans for any future stakeholder consultation exercises and for any future engagement during potential trade negotiations. The Government will continue to build upon its commitment to deliver an informed, inclusive and transparent trade policy.

Engagement with Devolved Administrations, Crown Dependencies and Overseas Territories

31. As set out in the Trade White Paper *Preparing for our future UK trade policy* the Government is committed to ensuring the devolved administrations (DAs) have a meaningful role in trade policy after we leave the EU. To develop and deliver a UK trade policy that benefits businesses, workers and consumers across the whole of the UK we will take into account the individual circumstances of England, Scotland, Wales and Northern Ireland. Working closely with the devolved administrations to deliver an approach that works for the whole of the UK continues to be a priority for DIT.
32. During the consultation, we took steps to engage widely in Scotland, Wales and Northern Ireland, including holding round tables in Edinburgh, Cardiff and Belfast.

33. The Scottish and Welsh Governments have provided views on the potential UK-Australia FTA via written responses and during discussion with DIT ministers and officials. We welcome and thank both Governments for these views.
34. The Northern Ireland Civil Service has published technical data in relation to Australia and trade and discussed this data with DIT officials. We thank them for this information.
35. DIT will continue to actively engage with the devolved administrations regarding any new potential trade deal with Australia through a new DIT/DA Ministerial Forum and our regular Senior Officials Group and Policy Roundtables.
36. We recognise the interest in potential UK FTAs from the Crown Dependencies and Overseas Territories, including Gibraltar, and remain fully committed to engaging them as we develop our independent trade policy for the UK. The Secretary of State for International Trade made this commitment clear in his letter to the Chief Ministers of the Crown Dependencies [and Overseas Territories] at the launch of the consultations in July 2018. Discussions between DIT and the Crown Dependencies continue on a range of Trade Policy topics.
37. We will continue to seek views from the Crown Dependencies and Overseas Territories, including Gibraltar, during any potential future FTA negotiations to ensure that their interests and priorities are properly taken into account.

Engagement with Parliament

38. The Government is committed to providing Parliament with the ability to inform and scrutinise new trade agreements as we progress with developing our future trade policy. The Secretary of State for International Trade, Minister of State for Trade Policy and the Government's Chief Trade Negotiation Adviser held a briefing session on the FTA consultations, open to all Members of Parliament (MPs), on 12 September 2018. Twenty-four MPs attended, and the questions were wide ranging, covering all four consultations. Comments sent to DIT by MPs on behalf of their constituents were also considered as part of our analysis of the consultation feedback. The House of Commons International Trade Committee also published a report on UK-US Trade Relations, to which the Government responded on 10 July 2018. We will consider the Committee's conclusions from its inquiry on Trade and the Commonwealth: Australia and New Zealand.
39. On 21 February 2019 there was a debate in Government time in the House of Commons on the four potential new FTAs. The purpose of this was to help the Government to understand parliamentarians' priorities for the new FTAs before formulating our negotiating objectives.
40. On 28 February 2019 we published a paper, *Processes for making a free trade agreement after the United Kingdom has left the European Union*, which sets out proposals on public transparency for future FTAs and the role of Parliament and the devolved administrations. This included confirmation that at the start of negotiations, the Government will publish its Outline Approach, which will include our negotiating objectives, and an accompanying Scoping Assessment, setting out the potential economic impacts of any agreement. The Government stands by its commitment to ensure that Parliament has a role in scrutinising these documents

so that we can widen the range of voices heard and ensure that as many views as possible are taken into account before commencing negotiations.

41. The Government plans to draw on the expertise and experience of Parliamentarians throughout negotiations, working closely with a specific parliamentary committee, or alternatively one in each House. We envisage that the committee would have access to sensitive information that is not suitable for wider publication and could receive private briefings from negotiating teams. This would ensure that the committee(s) was able to follow negotiations closely, provide views throughout the process and take a comprehensive and informed position on the final agreement.

Summary of responses

General Themes

Respondents across all stakeholder groups provided a wide range of comments on their priorities and concerns regarding a future UK-Australia FTA. More detailed analysis can be found in the 'Analysis of responses by policy area' section. The summary below sets out the key themes raised within the five policy areas which received the greatest volume of substantive comments. We also received a large volume of campaign responses, not all of which included individual comments. These are summarised in the 'Summary of campaign responses' later in this document.

The UK's existing labour standards and environmental protections should not be reduced or negatively impacted by any future FTA with Australia

Across all stakeholder groups, respondents raised the importance of maintaining the UK's high labour and environmental standards. It was felt that a UK-Australia FTA should protect workers' rights and should not adversely impact wages or job security. Respondents also reflected that increased trade generated by an FTA could contribute to climate change through additional transport activity and carbon emissions. Respondents reflected that an FTA provided an opportunity to ensure that the levels of protection and standards for both countries were aligned to the highest level.

There could be benefits to the UK from lowering or removing tariffs with Australia, but there may be some industries that would be best supported by maintaining existing tariffs

A number of comments focused on the potential benefits of reducing or removing tariffs between the UK and Australia. The perception was that this could further enhance trade between both countries and that it should be a key priority for a future FTA, as long as Australia did not stand to benefit more than the UK. Stakeholders stressed the importance of protecting some sectors by maintaining existing tariffs. In particular, respondents highlighted concerns that a reduction in tariffs (and an FTA more broadly) could have on certain sectors such as agriculture. It was recommended by some stakeholders that tariffs should be maintained in these sectors or reduced over time to manage any negative impacts to UK industries.

Any UK-Australia FTA should ensure a level playing field for UK businesses

Respondents highlighted that an FTA could increase competitiveness for UK products and ensure a fairer and level playing field for businesses operating in Australia. However, many stakeholders emphasised the importance of ensuring that an FTA did not negatively impact UK producers and businesses by exposing them to increased competition. Any reductions in standards through an FTA were seen as having the potential to make UK businesses more vulnerable to unfair competition. Stakeholders also highlighted the need to protect UK businesses from practices that were perceived as being unfair, such as undercutting producers by flooding the market with cheap imports.

The UK's existing product standards should be maintained through any future UK-Australia FTA

Stakeholders identified the importance of ensuring the UK's high product standards were not reduced or compromised through an FTA with Australia. Some recommended that standards should continue to align with those applied in the EU, and that standards should be harmonised across all future trading partners to reduce bureaucracy and ensure quality and consumer safety. Respondents stressed the importance of reducing the regulatory and administrative burden of product certification (particularly on SMEs), while balancing this against retaining high standards.

A future UK-Australia FTA could have a beneficial impact on services trade between both countries

Respondents highlighted the opportunities that an FTA could provide in terms of increasing services trade between both countries. Mutual Recognition of Professional Qualifications (MRPQs), and inclusion of provisions to support greater movement of skilled workers between both countries were identified as having the potential to benefit trade. Respondents also highlighted that areas such as digital and financial services should form part of an FTA, noting these were areas of comparative strength for both countries. Concerns focused on ensuring that Australia did not stand to benefit more than the UK from any services provisions.

Other main themes

In addition to the above, a number of key themes were reiterated through the comments received through the consultation. A significant number of stakeholders raised the importance of protecting public services, with particular reference to the National Health Service (NHS). This was mirrored in the responses received through the 38 Degrees organised campaign. The Government has made its position clear that decisions about public services will continue to be made by UK Governments, including the devolved administrations, and not future trade partners.

Other key messages included requesting that the UK maintain the UK's high food and Sanitary and Phytosanitary (SPS) Measures with concerns focused on the potential negative impacts on consumers of lowering food and SPS standards. In addition, stakeholders raised the importance of protecting the UK's Intellectual Property (IP) through any future UK-Australia FTA and ensuring that more widely, FTA provisions helped reduce the administrative and financial burdens of trade between both countries.

Stakeholders were positive about the potential for a UK-Australia FTA but highlighted that it should not compromise or negatively impact on the FEP with the EU.

Overview of Priorities

Respondents who completed their consultation response via the online survey, were classified into different respondent groups (Individual, NGO, Business, Business Association and Public Sector Body) and asked a series of questions (set out in Annex A).

All respondent groups were asked what they wanted the UK Government to achieve through a UK-Australia trade agreement and which of the 14 policy areas provided (as set out below) best described the priorities outlined in their previous answer. Business and business association respondents were also asked what they wanted the UK Government to achieve by reference to the 14 policy areas, and were provided with a supplementary question, asking which of these policy areas is their top priority.

The table below shows the top three policy areas selected as a priority for each of the different respondent groups.

Table 6: Top priorities selected by different respondent groups

Type of respondent (Total number)	First most selected priority (Total selected by)	Second most selected priority (Total selected by)	Third most selected priority (Total selected by)
Individuals (114)	Product Standards, Regulation and Certification 70	Tariffs 69	Customs Procedures 63
Businesses (32)	Tariffs 10	Services 7	Trade Remedies and Dispute Settlement 4
Business Associations (31)	Tariffs 10	Product Standards, Regulation and Certification 5	Services 5
NGOs (26)	Tariffs 17	Product Standards, Regulation and Certification 14	Labour and Environment 14
Public Sector Bodies (6)	Tariffs 4	Competition/ Investment 3	Sanitary and Phytosanitary Measures 3

Overview of Concerns

All respondent groups were asked what concerns they had about a UK-Australia trade agreement and which of the 14 policy areas provided (as set out below) best described the concerns outlined in their previous answer.

Business and business association respondents were also asked about their concerns by reference to the 14 policy areas, and were provided with a supplementary question, asking which of these policy areas was their top concern.

The table below shows the top three policy areas selected as a concern for each of the different respondent groups.

Table 7: Top concerns selected by different respondent groups

Type of respondent (Total number)	First most selected concern (Total selected by)	Second most selected concern (Total selected by)	Third most selected concern (Total selected by)
Individuals (88)	Product Standards, Regulation and Certification 44	Labour and Environment 37	Tariffs 36
Businesses (27)	Services 8	Tariffs 6	Digital 3
Business Associations (27)	Tariffs 7	Services 7	N/A
NGOs (25)	Product Standards, Regulation and Certification 13	Tariffs 13	Sanitary and Phytosanitary Measures/Intellectual Property 11
Public Sector Bodies (5)	Tariffs/Competition 3	Product Standards, Regulation and Certification/Labour and Environment 2	Sanitary and Phytosanitary Measures/Rules of Origin 2

Analysis of responses by policy area

This section contains a detailed analysis of the free text comments submitted. The feedback has been summarised with reference to the 14 policy areas and other comments provided and grouped by respondent type: (1) Individuals (2) Businesses (3) Business Associations (4) NGOs (5) Public Sector Bodies. Please note that where respondent feedback from across these different groups reflected similar views, comments or issues highlighted might overlap. Technical terms can be found in the glossary located in Annex C.

Tariffs

Overall, respondents were positive about the potential benefits of a trade agreement with Australia. There was a strong preference for either lower tariffs or their complete removal, with businesses explaining how they could benefit from this and the resulting increased trade between the UK and Australia. However, the need for protection of the UK market was also highlighted in many responses. A few respondents, notably from the agricultural food sector, stressed the importance of maintaining certain tariffs or reducing them gradually over time to protect UK producers' and farmers' livelihoods.

Individuals

Thirty-one individual respondents prioritised tariffs in their comments with the main message being that the reduction or removal of tariffs should be a key priority for an FTA with Australia. Some individuals highlighted the importance of reducing both tariffs and non-tariff barriers to facilitate trade and promote increased trade flows between the UK and Australia. Eighteen individuals called for an FTA without any tariffs on goods. However, three individuals flagged concerns, including the need for the UK not to diverge from existing EU tariffs and standards given the EU is the UK's biggest market. There was also concern expressed about future FTA provisions, including those on tariffs, being more beneficial to Australia.

Businesses

Twenty-four businesses asked for the UK Government to prioritise tariffs in a future FTA with Australia. Eleven businesses called for the removal or reduction of tariffs, citing the opportunities this could bring from increased trade between both countries, with one respondent noting that promoting electronic commerce (e-commerce) could be one such opportunity. Responses included requests for reductions on specific tariffs, such as for grain, or their removal for products such as raw cane sugar and wine. Many respondents called for any changes to tariffs to be fair to both the UK and Australia and not negatively impact UK industries or agriculture. A need to respect the WTO Pharmaceutical Tariff Elimination Agreement was also raised (to note, Australia is already a participant). Some respondents asked for any future trade negotiation to aim for trade liberalisation for all products manufactured by the life sciences industry. Seven businesses expressed general concerns, with one commenting specifically about the potential significant impact on the affordability of UK products and competitiveness. There were concerns about whether the outcome of negotiations between the UK and Australia would be fair and equal.

Business Associations

Forty-five business associations raised tariffs as a priority in their comments and welcomed the removal or reduction of tariffs which could greatly benefit particular UK industries, for example, cosmetics, spirits, books, journals and newsprints. Representatives of the Scottish salmon sector also indicated support for removal of tariff rate quotas (TRQs). One respondent highlighted the potential benefits for the automotive sector of removing of Australian automotive tariffs. However, there was a wider recognition that in some cases reducing or removing tariffs might increase competition faced by UK business or reduce benefits from tariff preferences granted to developing countries. Twenty-six business associations raised concerns about tariffs which included points about the affordability of high shipping costs between UK and Australia singled out for comment.

NGOs

Fifteen NGO respondents raised tariffs as a priority in their comments. Responses highlighted potential benefits from a reduction of tariffs. Ensuring that exceptions were available for agricultural food products was also highlighted by respondents as being a priority. A few respondents favoured the reduction or removal of tariffs and TRQs. Seeking improved terms of trade for products manufactured or designed in the UK (eg in the textile industry) was also flagged as being important. Eleven NGOs highlighted concerns around the impact of tariff reduction on UK businesses. Comments included the need to consider how this might interact with domestic reforms, such as the withdrawal from the EU Common Agriculture Policy.

Public sector bodies

Six public sector bodies referenced tariffs as being a priority in their comments and four as a concern. Responses tended to focus more on non-tariff barriers and one respondent was of the view that given Australia currently does not impose tariffs on certain products (eg most seafood) any tariff reductions negotiated in an FTA would not significantly improve the terms of trade for UK exporters.

Rules of Origin (RoO)

Respondents, particularly businesses and business associations, tended to highlight the importance of RoO for current global supply chains, including those involving the EU. A common theme among business association respondents, who expressed views on behalf of their members, was to call for further simplification and support in understanding RoO. Comments were also raised by respondents in this section on Geographical Indications (GIs) however, in an FTA, GIs are contained within the IP chapter and therefore have been considered in that section.

Individuals

Individuals did not specifically raise RoO as either a priority or a concern in their comments. However, a comment was raised calling for RoO, as well as market access and regulatory aspects of trade policy, to be designed to facilitate trade and not impede it. The impact that changing RoO may have on the quality of imported products was noted as a concern.

Businesses

Fourteen businesses raised RoO as being a priority in their comments, and five identified it as being a concern. On content requirements, one responding business, based on its experience in extractive and metal industries, recommended using the regional value content (RVC) approach as the most effective way of determining product specific RoO. Some business respondents recommended allowing products to benefit from diagonal cumulation with the EU, along with calls to simplify and harmonise RoO. Ensuring the similarity of RoO to be applied in future UK FTAs with those already agreed in EU FTAs, was flagged as being important in reducing administrative burdens. One business, with global supply chains, was concerned that products developed in the UK might not be considered in the future as originating in the UK due to components coming from overseas and being sourced from within the supply chain.

Business Associations

Thirty-two business associations referenced RoO as being a priority for a UK-Australia FTA and 19 viewed it as a concern. Due to the importance of their global supply chains, some business associations highlighted that some of their members would not be able to meet restrictive RoO requirements. As a result, business associations requested alternative requirements for determining origin which were more reflective of global supply chains. Seven respondents suggested diagonal cumulation with the EU or other countries, seeking RoO that were compatible with the future EU-UK relationship, or replicating EU-standard preferential RoO.

Eight business associations called for simplifying or minimising the administrative burden of RoO. Suggestions included self-certification, use of electronic preferential origin documentation and certification, trusted trader relationships and standard rules between major trading blocs. Other respondents sought greater flexibility for imports to the UK market and highlighted vulnerability to dumping, with some respondents suggesting a link between RoO and dumping practices. One respondent included a need for tight, well-defined RoO to avoid circumvention. They suggested the change of tariff heading as being a preferred approach or, in certain cases, the use of regional content thresholds of more than 50 per cent.

NGOs

Three NGOs referenced RoO as being their priority in their comments, and two identified it as a concern. One respondent suggested that RoO cumulation requirements between the UK and Australia, as well as other developed countries, should be set at 25 per cent, which they regarded as being a world-leading liberal standard and highlighted as being well below the lowest threshold set in CPTPP - namely originating materials representing at least 30 per cent of the value of goods - and thresholds set in other trade agreements.

Public sector bodies

Public sector bodies did not specifically raise RoO as either a priority or a concern in their comments, although a concern was raised over the potential impact of removing current regulations on RoO.

Customs Procedures

Most of the comments raised by respondents focused on the need to have efficient and cost-effective customs procedures in place to ensure that they do not impose an administrative or financial burden for economic operators, notably SMEs, and do not interfere with the operation of many industries, for example, those which work based on supply chains and 'just in time' deliveries.

Individuals

Three individual respondents raised custom procedures as a priority in their comments. Responses focused on the need to keep the administrative burden as low as possible (particularly for small exporting businesses) to make trade with Australia as easy and frictionless as possible. Respondents suggested we look towards similar customs procedures as currently applicable in trade between Australia and the EU. One respondent suggested that new technology, such as a blockchain ledger, could be introduced to record and enhance trade in goods between Australia and the UK by reducing the need for customs intermediaries. Two individuals marked customs procedures as a concern, with the need to reduce 'red tape' being mentioned repeatedly.

Businesses

Twenty-one business respondents viewed customs procedures as a priority in an FTA with Australia. Most comments related to minimising the regulatory burden with requests to improve the overall speed of custom clearances and to keep paperwork minimal. Suggestions included using the Integrated Cargo System or another electronic/online system. Several respondents called for customs-related requirements to be reduced, eg limited to certification proving origin, specifically for food. Respondents also made reference to the WTO Trade Facilitation Agreement, which contains provisions for effective co-operation between customs and other appropriate authorities on trade facilitation and customs compliance issues. The recommendation was to build on this agreement by standardising approaches to customs legislation to give certainty to traders. A concern expressed by some Australian wine producers was the effect of possible queues and delays at borders and ports in the UK once the UK has left the EU, given the UK is currently the central European hub for the flow of Australian wine exports moving across Europe. Seven business respondents raised customs procedures as a concern. Comments included the effect on 'just in time' supply chains once the UK has left the EU with the potential for delays in obtaining or transferring component parts to and from overseas leading to high levels of storage and inefficiencies.

Business Associations

Twenty-five business associations called on the UK Government to prioritise customs procedures in a future FTA with Australia and 18 raised concerns. As with businesses, reducing bureaucracy and costs were the main recommendations made by business associations. These included the potential impact on electronic transfer of data, checks carried out in transit to avoid delays in ports, as well as investment in infrastructure of ports and airports to ensure effective handling of merchandise. Respondents also raised the issue of disproportionate costs and burdens for SMEs, suggesting customs procedures should be effective, but 'light touch'. The frequency of changes in Australian regulations was also raised as an issue as they require manufacturers to frequently adjust information on the product or in the export documents. One respondent referred to the need

for valuation and transfer pricing policies that are consistent with Organisation for Economic Co-operation and Development (OECD) guidelines.

NGOs

Four NGOs raised customs procedures as a priority with the focus on minimising administrative burdens for UK businesses trading with Australia. One respondent emphasised the benefits that trade facilitation measures could bring about for business thus leading to enhanced levels of economic activity. One NGO asked for robust customs procedures to be maintained for agricultural produce entering the UK from Australia. Five NGOs raised concerns, including anti-business customs practices, which could lead to costly customs delays. Moreover, the issues of import duties and border Value Added Tax (VAT), VAT payment systems, trade finance (including letters of credit), and marine, aviation and transport insurance and reinsurance were raised.

Public sector bodies

No public sector bodies commented on customs procedures as a priority or a concern in their feedback.

Services

Respondents recognised the importance of services in trade agreements, covering several sectors including professional and financial services. Feedback was largely sector specific with comments relating to particular requirements for those industries. For financial services, respondents covered a broad range of sub-sectors which included asset management, banking, insurance, financial technology (FinTech), green finance and infrastructure finance. The importance of MRPQs was referenced. Respondents also emphasised the need for FTAs which prioritised the movement of skilled workers, allowing businesses access to the best talent. Relevant comments on public services, including the NHS, were also raised in the consultation sections on investment and Government procurement but have been considered in this section.

Individuals

Thirteen individuals viewed services as a priority for a future FTA with Australia, and five raised concerns. Generally, individuals' views on an FTA with Australia were positive, with many pointing to historic and cultural links between the two countries. Many individuals identified greater MRPQs and a reciprocal streamlined visa system as being their priority, with respondents calling for movement of professionals and workers between Australia and UK to be prioritised. One respondent stated that they would like to see the UK join the Trans-Tasman Travel Arrangement (TTTA) which could facilitate intra-company transfers in areas of mutual benefit to both economies. Some respondents emphasised they did not want any future FTA to negatively impact existing public services, specifically the NHS. Similar concerns were raised about the perceived threat to NHS services from private healthcare companies if public services were liberalised in a UK-Australia FTA. The impact of distance on trading services with Australia was also perceived by some individuals as being a potential issue.

Businesses

Twelve businesses referenced services trade, particularly professional and financial services, as a priority and identified a preference for MRPQs to be included in a future FTA with Australia and the need for the flexibility to recruit overseas staff and for staff temporarily moving to work overseas. One business specifically highlighted the need for measures enabling the temporary movement of workers and professionals for business reasons, while other businesses highlighted the need for measures reducing visa fees, minimising experience thresholds for intercompany transfers and extending the Australian skilled occupations visa eligibility list. Business respondents who called for an FTA to prioritise the movement of highly skilled professionals in order to enable their global business networks to grow, emphasised the heavy reliance that businesses have on cross border activity and movement.

For financial services, both business and business associations had a particular interest in supervisory and regulatory co-operation, highlighting the opportunities for the asset management sector, including streamlining of regulatory reporting, mutual recognition, and the example of the Asia region funds passport. Several businesses stated that a key priority for a UK-Australia FTA was maintaining access to both countries market insurance and reinsurance businesses through cross-border trade and establishment. Several respondents identified that they would like to see the removal of restrictions in relation to retail, banking and insurance. These respondents also called for the UK to use its expertise as a leading hub for green finance to cooperate with Australia's similar expertise. Recognition of licences and certificates and harmonisation of regulations were also identified as priorities across several sectors. In total eight businesses expressed concerns on trade in services, with several respondents remarking that an FTA could not benefit the UK as much as Australia, with regards to trade in services.

Business Associations

Twenty-two business associations viewed trade in services as a priority in their comments. Business associations also wanted financial services to be at the forefront of policy development for the future trading relationship with Australia, with particular interest in closer regulatory co-operation. One respondent identified that Australia has invested over £1.8 billion (as of 2016) in UK financial services and is the second largest investor in the UK's insurance sector.

Some respondents stressed that trade in services is particularly important to SMEs seeking to export services and called for the inclusion of tailored SME provisions in a services chapter of an FTA. There was also a request for an FTA to liberalise the movement of skilled workers and MRPQs and to see the implementation of the Customs Declaration Services, which could ease the administrative burden on SMEs when exporting. It was noted by one business association that minimising the bureaucracy of visa applications provides an opportunity for the UK, as they felt the UK is currently losing out on Australian business ventures to the US due to UK visa restrictions on highly qualified personnel. Ten business associations raised concerns about a potential UK-Australia FTA, with a recurring concern about Dispute Settlement Mechanisms in a potential FTA and encouraged the UK Government to consult industry and civil society.

NGOs

Thirteen NGOs viewed trade in services as a priority, with several respondents calling for the frictionless movement of services. Some NGOs called for the inclusion of MRPQs in a services

chapter of a potential UK-Australia FTA, including certificates and licences. Some NGOs saw the greatest opportunity for increased trade flows to be trade in services, with one stating that the difference in time zones is beneficial as services and support can be provided from various offices and across time zones, boosting the globalised services industry. NGO respondents also commented that the UK is a leader in financial services and called for the UK's high regulatory requirements to be protected. Thirteen NGOs raised concerns on a number of services related issues, including ISDS and a lack of transparency in any potential negotiations. One NGO raised concerns around the limited role of the devolved administrations stating that any future trade agreement may affect devolved matters. Respondents also commented on the importance of protecting public services, including the NHS.

Public sector bodies

Five public sector bodies asked the UK Government to prioritise trade in services, with two raising concerns. Many respondents were keen for a bilateral FTA with Australia, noting the ease by which financial and related professional services could do business and use expertise in the region and that UK businesses could expand in this market. Public sector body respondents also highlighted the need to ensure free movement of skilled workers between Australia and the UK. Comments also referenced the value in harmonising services standards. Several public sector bodies also identified the benefits of free movement of financial services employees and welcomed strong financial services elements in any future FTA. Respondents also identified that cross-border trade in financial services supports competition across financial markets and provides a wide range of choice to customers. One respondent identified that in 2017, the UK exported £832 million of financial services to Australia, up from £814 million in 2016.

Public sector bodies expressed concerns that an FTA could potentially lead to the privatisation of public services. One public sector body called for the uncertainties and timeframes surrounding visa applications to be addressed, flagging the benefits that reciprocal business visas could bring to both the Australian and UK businesses and markets. There was also a comment about excluding public services, including the NHS, from the scope of FTAs.

Digital

A recurring theme of the feedback was the need for free flow of data, with respondents highlighting the importance of effective data protection and the need to prevent data localisation. There was general support for global rather than national responses to the tax challenges of digitisation and for rules on digital goods not being a barrier to trade. With regards to telecommunications respondents, many respondents wanted to enhance non-discrimination clauses to protect net neutrality and ensure better market competition. Some respondents also used the consultation as an opportunity to express their opposition to any changes to current EU platform liability rules.

Many respondents were of the view that Australian businesses can already access the UK's Audio-Visual (AV) market. A number of respondents focused on how an FTA might adversely affect the UK's AV ecosystem, with one respondent making particular reference to the positive impact of the UK's Public Service Broadcasting (PSB) system to the success of UK businesses abroad. Some respondents were also of the view that advertising time is discriminatory against non-Australian content, and that media businesses are subject to foreign ownership restrictions.

Respondents from the newspaper industry called for there to be no unjustified restrictions on the cross-border publication dissemination of UK newspapers, in print and online, or news brands subscriptions and advertising services. Responses from the gaming sector were positive, emphasising the need to maintain frictionless trade and break down barriers where these existed with trading partners.

Individuals

Three individuals raised digital as a priority in their comments and two raised it as a concern. Comments included enforcing every party's right to regulate data in the national interest to protect privacy. The opportunity to enable content to be shared between Australian Broadcasting Corporation (ABC) and the British Broadcasting Corporation (BBC) to help counter use of Virtual Private Networks (VPN) and illegal torrenting was also flagged by one respondent. One respondent perceived data and privacy protections to be weaker in Australia.

Businesses

Thirteen businesses prioritised digital in a UK-Australia FTA and nine raised digital as a concern. Businesses called for alignment of digital regulatory requirements across future UK FTAs, including through reference to internationally accepted standards (for example, one respondent called for alignment with Information Commissioner Office (ICO) guidelines on Big Data), as well as mutually recognised standards. Three businesses commented that it is important to ensure free flow of data and two businesses raised the control of data movements across borders as being particularly important. Data protection and privacy were also key concerns for three businesses.

Business Associations

Fourteen business associations referenced digital as a priority while 15 identified this area as a concern. Business associations called for several areas to be covered in a UK-Australia FTA. These included calls for the UK's Enterprise Act to form a part of a future FTA and for it to reflect the Digital Economy Act of 2017 for user data. There were also requests for the FTA to align with the ICO guidelines on Big Data; for a data sharing agreement with Australia; and calls for co-operation on data ethics and Artificial Intelligence (AI). Four business associations mentioned the importance of ensuring that an FTA with Australia does not have compulsory data localisation. Data protection and privacy was a concern for six respondents. Some respondents asked for the Government to consult at a detailed sectoral level throughout the negotiation process.

NGOs

Three NGOs viewed digital as being a priority and two NGO respondents referenced this area as a concern in their comments. Two NGOs raised the importance of maintaining current arrangements with the EU on digital trade policies. NGOs also wanted a UK-Australia FTA to ensure the free flow of data, aligning data protection regulations and prioritising economic growth. One NGO recommended ensuring digital trade remains untaxed and that provisions should be included to stop governments from imposing requirements that restrict digital services. The need to enforce data privacy obligations to ensure that data flows as smoothly as possible was also commented upon.

Public sector bodies

Three public bodies prioritised digital in their comments, with no public sector bodies raising concerns in their response. One respondent suggested that cyber security could be a potential market for UK businesses in Australia. Two public sector bodies mentioned the importance of increasing co-operation and partnership in the digital economy.

Product Standards, Regulation and Certification

This policy area covers technical regulations, voluntary product standards and the procedures to ensure that these are met. Standards and measures to protect humans, animals and plants as well as to regulate food, animal and plant safety are discussed under the SPS section of this document.

The terms 'standards' and 'technical regulations' are used frequently in trade agreements when addressing 'technical barriers to trade'. While the word 'standard' is used informally to mean a level of quality or attainment, in the context of trade agreements 'standards' have a formal technical meaning. 'Standards' in this sense are voluntary documents developed through consultation and consensus which describe a way of, for example, making a product, managing a process, or delivering a service. While standards are voluntary, when cited in a regulation, their use can become compulsory. Standards are not set or controlled by the Government. 'Technical regulations' are mandatory requirements set out in the legislation and they are controlled by governments and legislators (Parliament in the UK). For regulated products and services, standards can be used to support compliance.

A significant number of responses focused on product standards, regulation and certification with a need to maintain current high standards and continue to align UK standards and regulations with those applicable in the EU. There were a number of in-depth sector specific responses focusing on regulatory frameworks and potential sectoral annexes to the future FTA. Relevant comments regarding standards that were raised in the consultation section on labour and environment have been considered in this section.

Individuals

Seventeen individual respondents viewed product standards, regulation and certification as a priority and nine as a concern. Several respondents asked for existing regulations for products and consumer rights to be maintained or improved to ensure a high level of quality and safety. Some respondents also commented on harmonising arrangements between trading partners, either through aligned standards or aligned certification. The most frequently raised concern was in relation to the impact of lowering standards and levels of protection which might result from trade liberalisation and increased trade flows with Australia. This included concerns about the potential impact from low quality imported goods and the potential for reduced control over what could be imported into the UK.

Businesses

Fifteen businesses referenced standards in their comments as being a priority in a future trade agreement with Australia, with an emphasis placed on maintaining current UK standards and aligning with the EU. A key focus was on the need for mutual recognition of conformity assessments, regulatory co-operation with Australia and alignment of future FTA provisions to EU

FTAs. Some respondents also stressed the benefits of Mutual Recognition Agreements (MRAs). This allows states to officially recognise the results of inspections and tests conducted in another state as being equal to their own inspections and testing. As such MRAs are perceived to reduce administrative burdens, time delays and costs, eg the need to re-test imports or exports. In this context, they noted that the UK currently benefits from the EU-Australia MRA on conformity and called for this to continue after we leave the EU.

Respondents were also in favour of the UK being involved in international co-operation related to development of international standards which could be then applied by the UK and its partner countries. Some respondents supported greater co-operation towards recognition of the equivalence of applied technical regulations and standards to facilitate trade. One respondent was in favour of alignment between the quality mark of the British Standards Institution (Kitemark) with an Australian equivalent to facilitate marking and recognition of high-quality products which are safe for consumers. Three businesses expressed concerns which focused mainly on the need to prevent low quality imports that do not meet UK standards and regulations from entering the UK. There was also unease around the amount of regulation and bureaucracy connected with the adoption of national product standards and the effect of a lack of harmonisation with standards used internationally.

Business Associations

Thirty-three business associations viewed product standards, regulation and certification as being a priority for a future FTA with Australia and 18 expressed concerns. Many respondents stressed a need for simplified procedures and reduced regulatory and administrative burden, particularly for SMEs. For example, through mutual recognition of inspection results, while at the same time balancing this with the need to maintain high standards, and not permit imported products which do not adhere to these. Some respondents also highlighted the importance of the UK remaining aligned with standards and regulations used in the EU. Continued alignment with standards and regulations used in the EU including co-operation with the European Medicines Agency (EMA) was flagged as a top priority for the pharmaceutical industry associations who responded.

Some respondents were also in favour of MRAs between the UK and Australia to facilitate trade. One respondent thought the UK Government should seek, through the FTA, to strengthen co-operation with Australia on standards, technical regulations and conformity assessment procedures, with a view to increasing the mutual understanding of their respective systems and facilitating access to markets. It was suggested that regulatory dialogues could be established both at the horizontal and sectoral levels. The UK and Australia could exchange information, simplify technical regulations and conformity assessment requirements (when appropriate), as well as choose or refer to the most relevant standards in areas which might affect trade. Greater co-operation in the development of international standards, guidelines and recommendations was also supported. Specific detailed comments were made on standards and regulations covering the following sectors: publishing, cosmetics, automotive sector and food and drink. Respondents also flagged the challenges faced by SMEs in complying with technical regulations and standards in international trade. Others referenced benefits of the EU-Australia MRA.

NGOs

Eighteen NGOs prioritised standards, regulation and certification in a future trade agreement with Australia in their feedback. The main focus of the feedback was on maintaining or improving

product standards and consumer protection rights. Other priorities included ensuring that standards applicable in the UK were adopted by all future trading partners and aligning standards with those used internationally. Fourteen NGOs raised concerns, focusing on changes in product standards impinging on consumer rights and protection and the possibility that importing low-quality goods might have a negative impact on standards more generally, through unfair competition and the 'race to the bottom'.

Public sector bodies

Three public sector bodies prioritised standards, regulation and certification in their comments. All comments called for harmonisation or mutual recognition of standards with Australia, in technology and manufacturing sectors, as well as regarding medical devices, medicines and non-medical consumables. One public sector body respondent expressed concerns about the impact of changes to the environmental standards of production.

Sanitary and Phytosanitary Measures (SPS)

This policy area covers standards and measures to protect humans, animals and plants as well as to regulate food, animal and plant safety. Voluntary product standards and the procedures to ensure that these are met are discussed under the product standards, regulation and certification section of this document.

Responses generally centred around the need to maintain high UK food requirements and on SPS. Respondents also expressed concerns that the food standards may be lowered as a result of new trade agreements. Others highlighted a need to continue to align the standards and regulations with those applicable in the EU, as well as pointed to differences between the UK's and Australia's regulatory approach to "hormone beef" and antibiotics.

Individuals

Sixteen individuals viewed SPS as being a priority in a future FTA with Australia and 13 as a concern. A recurring theme in the feedback was the importance of not lowering or compromising on the UK's current high food standards. Five respondents highlighted the need to maintain animal welfare standards. Several respondents focused on continuing to align SPS measures with those applicable in the EU. Many respondents emphasised the need to maintain effective border controls to prevent the spread of diseases, as well as imports of products related to processing practices or farming methods prohibited in the UK (eg "chlorine-washed chicken" and hormones) or subject to different regulation (Genetically Modified Organisms (GMOs) and pesticides).

Businesses

Ten businesses identified SPS as being a priority and four as a concern in their comments. Responses focused on the importance of achieving equivalence in standards and regulations. One respondent suggested that tariffs should only be removed where overall SPS measures are materially equivalent. Some respondents within specific agricultural-food sectors also stressed that SPS measures should not be more stringent than those currently applied by the EU.

Business Associations

Twenty-two business associations referenced SPS measures as being a priority in their response and 18 as a concern. Several respondents advocated the use in an FTA with Australia of EU SPS measures recently agreed with third countries, as well as the continued alignment of UK standards with those applicable in the EU. Some respondents highlighted the importance of food safety regulation being risk-based, minimally burdensome and able to facilitate competition and innovation. There was also a call for the UK Government to consider more carefully the impact on SMEs. Seven respondents emphasised the importance of maintaining and improving standards, including on animal welfare. One organisation expressed concern about a potential reduction of UK standards and the negative impact for domestic producers. Representatives of some sectors, eg cheese and meat (notably beef) highlighted difficulties in exporting these products to Australia on sanitary grounds. Respondents were of the view that the UK Government should address these barriers in negotiations.

NGOs

Twelve NGOs referenced SPS as a priority in their comments and 16 as a concern. Many NGO respondents highlighted the importance of maintaining domestic food standards and the need to prevent the imports of lower quality food produce. Several NGO respondents focused on specific SPS concerns, notably hormone-growth in Australian beef and the negative impacts this may have on UK domestic production. The use of antibiotics in Australian farming practices was also raised with reference made to the UK's official support for the UN World Health Organisation (WHO) Food and Agriculture Organisation (FAO) One Health Antimicrobial Resistance (AMR) Strategy. The rates of food poisoning (notably salmonella) in Australia were also highlighted in a number of NGO responses. Here, the respondents linked high rates of food poisoning with lower standards of animal welfare. Several NGOs referenced continuing to align domestic SPS measures with those applied in the EU.

Public sector bodies

Two public sector bodies prioritised SPS and three expressed concerns relating to food standards which included the potential consequences for the public. One respondent, with an interest in the fishing sector, highlighted that SPS requirements (regarding seafood) in the UK and Australia are already largely aligned through existing SPS arrangements between the EU and Australia. One respondent flagged their concerns for farming producers in their area that might be negatively impacted by a significant increase of Australian produce in the UK market at a time of transition for the farming sector.

Competition

Although the terms 'competition' and 'competitiveness' are sometimes used interchangeably, they have distinct technical meanings. Competition policy covers the rules and regulations concerning the way businesses operate within a market and the enforcement of such rules. Competition laws, for example, typically cover anti-competitive agreements between firms, abuse of a dominant position and merger control. Competitiveness refers to the general ability of a firm to operate in a market compared to other firms that operate in the same market, or the strength of a whole industry or economy relative to another.

Overall, most respondent groups commented on the impact of FTAs on competitiveness, not on competition policy or legal regimes. The respondents referred to high standards applicable in the UK and the related compliance costs in the context of international competitiveness. Some referred also to monopolistic practices of large firms and the need to address them.

Individuals

Fifteen individual respondents referenced competition as a priority in their comments and 15 respondents viewed it as a concern. The main issues raised were around the risk of unfair competition for UK producers, primarily in the farming and meat industry, due to better weather conditions and the potential for lower standards to give imports a comparative advantage. Comments also included the perception (by some respondents) of weaker food, drink, data, privacy and labour protections in Australia which might make UK businesses vulnerable to unfair competition. Alternatively, some respondents were positive about the opportunities arising from more market competition, lower prices for consumers and higher wages.

Businesses

Fourteen businesses prioritised competition and 11 viewed it as a concern in their comments. Many respondents recognised that the UK could be a benchmark for quality in any agreement covering services, digital trade and telecommunications and requested the removal of any trade barriers such as lack of liberalisation, which bars foreign competition. One comment from an international communications company asked for consistent, pro-competitive regulation of business grade wholesale access to communications networks to prevent discrimination by major suppliers. A media company was concerned that a trade deal with Australia might impact, some or all the PSB regime, which allows the UK to compete strongly with other countries in the AV market.

Business Associations

Thirty-one business associations prioritised competition in their comments. Many respondents were positive, with one commenting that the removal of import duties could make UK products more competitive without damaging the local small-scale production. Greater access to the Australian market was considered to increase competitiveness of UK products and ensure a more level playing field for UK companies. Twenty-three respondents raised concerns, with several comments addressing domestic legislation, regulatory environment and standards, in this context. Lower standards or broader definitions of certain product categories (eg spirits) in Australia might put the UK high quality goods (such as whisky) in a disadvantaged position on the Australian market. Other points made included an expectation that products that do not meet UK standards might not be allowed on the UK market. One respondent suggested the UK Government explore the question of competition in the digital sector and stressed that any outcome could have a profound impact on the UK domestic competition regime and should be factored into any FTA discussions. Respondents from the publishing sector, were of the view, that the current competition framework is strong, but they welcomed action to tackle the monopolistic behaviour of large technology firms. Some respondents asked for the Government to secure cross-border collaboration on anti-trust issues and ensure multiple routes to market exist to counter monopolistic behaviour detrimental to consumers.

NGOs

Thirteen NGO respondents viewed competition as a priority in their comments, and 16 raised concerns. Many NGOs advocated free trade and opening the UK market up to competition in all aspects of the economy. Several NGOs expressed concerns that high domestic standards and therefore relatively high compliance costs applicable to UK enterprises (food producers) might put them in a disadvantaged position, compared to Australian competitors. There were also comments addressing healthcare and social services, including concerns about competitive tendering and liberalised procurement rules.

Public sector bodies

Four public sector respondents referenced competition as being a priority in their comments and four respondents expressed concern. Comments included being able to promote competition, which could boost growth and investment across financial markets. Other respondents made requests for mechanisms addressing anti-competitive behaviour to be developed and to ensure the potential impact on domestic businesses of competition is fully understood and mitigated. There were also comments focused on healthcare and social services, including concerns about liberalised procurement rules and competitive tendering.

Government (Public) Procurement

There were a wide range of views expressed in relation to government procurement. While some respondents advocated opening up central and sub-national procurement markets for foreign bidders, others favoured UK authorities prioritising local suppliers. Many respondents stressed a need for high standards in government procurement, as well as transparent, fair, and stable rules, with sufficient access to accurate information. Comments relating to public services, including the NHS (which emerged as a very high priority issue for all respondents) have been noted in more detail in the Services section of this document. To note, the term 'public procurement' was used in the consultation, however, the term 'government procurement' is more commonly used in the international trade context and will therefore be used.

Individuals

Eight individual respondents viewed government procurement as a priority in their comments with three raising it as a concern. One respondent advocated closer co-operation on military procurement and another suggested amending Public Contracts Regulations (PCR) (2015) to allow companies from Commonwealth countries to now bid for all public contracts above £115,000 in the UK to ensure their equal treatment to that currently enjoyed by EU Member States. Concerns raised by respondents also focused on the need to protect the NHS and other public services against any liberalisation of government procurement rules.

Businesses

Twelve business respondents referenced government procurement as a priority in their comments. Points made included the need to promote high standards in government procurement, with open, fair and transparent rules to support interests of industry, commissioning public authorities and the general public. One respondent stated that this should be combined with simplification of applications and procedures and the use of one portal for all contracts to enable all eligible

companies, including SMEs, to bid and compete on a level playing field. Some respondents were of the view that the UK's potential FTA with Australia could open additional opportunities for UK companies to have access to procurement contracts at central and sub-national level, with Australian commitments under an FTA complementing those under the WTO Government Procurement Agreement (GPA). Some respondents asked for the UK Government to help them navigate through Australia's public policy and regulatory regimes surrounding government procurement. Four respondents expressed concerns, which included concerns about Australia's national interest considerations impacting UK business access to Australian procurement markets (particularly in the defence sector). There were also concerns regarding limited access to information which may put UK companies (as foreign bidders) in a disadvantaged position.

Business Associations

Thirteen business associations commented on government procurement as a priority and seven business associations expressed concerns. Comments included a request for broad market access coverage for goods and services and a desire to access both, central and sub-national government contracts. Some respondents were of the view that removing barriers to government procurement could create new business and employment opportunities. They also requested a level playing field domestically, given that UK companies face competition from foreign bidders in our relatively open domestic market but do not have a comparable access to third countries' procurement opportunities. Feedback was received from specific sectors, for example, railways, construction and financial services, where UK companies have interest in Australian government procurement opportunities. Some respondents also requested greater transparency and access to information about procurement opportunities.

NGOs

Eight NGO respondents had government procurement as a priority and eight respondents raised it as a concern in their comments. Many respondents called for clauses in the agreement to ensure the UK Government and other public authorities could prioritise purchases from local suppliers (eg food industry), pursue social and environmental objectives and support ethical procurement initiatives. Such clauses were thought to promote decent working conditions as well as high quality, locally sourced food. In this context, several respondents expressed concerns that a future FTA may not allow this type of prioritisation.

Public sector bodies

Two public sector bodies prioritised government procurement in their comments and one raised concerns. Echoing responses from other respondents, public sector bodies called for the exclusion of public healthcare services from requirements for fully open competitive tendering or onerous procurement requirements, while adhering to WTO rules of fairness and transparency.

Intellectual Property (IP)

Overall, respondents highlighted the need to protect UK IP standards. A high proportion of responses were from the creative industries flagging issues on copyright. One individual respondent suggested an FTA could be an opportunity to enable content to be shared between the ABC and the BBC to help counter the use of VPNs and illegal torrenting. Responses also focused

on patent policy and its interactions with both the generic and innovative pharmaceutical sectors. NGOs respondents emphasised the need for market access for generic drugs, while businesses and business associations wanted strong IP patent protection for innovative products. Relevant comments on GIs that were raised in the consultation section on RoO are considered in this section.

Individuals

One individual respondent commented on IP as a priority. This respondent advocated that there should not be any anti-business IP practices introduced in an UK-Australia FTA, as well as calling for bureaucracy and regulation associated with IP to be reduced. No individual respondents commented on IP as a concern in their feedback.

Businesses

Seventeen business respondents commented on IP as a priority and four viewed it as a concern in their feedback. The focus for businesses was on protecting existing IP rights through maintaining trade mark, copyright and patent protections. One business highlighted the need in Australia for adequate patent term extension mechanisms, higher levels of regulatory data protection, and an effective mechanism to enable patent disputes to be resolved. Effective patent protection and harmonising IP standards were raised by three SME respondents. The need for robust enforcement for infringement of IP was a common theme in the feedback. There was also a suggestion for a joint trade mark and patent registration scheme with Australia.

Business Associations

Thirty-one business associations prioritised IP in a future trade agreement with Australia and 22 respondents raised it as a concern in their comments. The focus of the feedback was predominantly on maintaining existing IP rights, tackling infringement and pushing towards the harmonisation of standards. We received a significant number of responses from across the creative industries asking for IP rights to be protected, including the Artists' Resale Rights and commitments of minimum terms for copyright protection of 70 years after the death of the creator. Several respondents were concerned about Australia potentially broadening copyright exceptions as the Australian government recently held a consultation on copyright modernisation. Business associations representing the innovative pharmaceutical sector called for alignment on rules on regulatory data protection up to EU norms, and for patent holders to be given notice prior to a third party entering the market.

NGOs

Nine NGOs asked for the UK Government to prioritise IP in a UK-Australia FTA and seven expressed concerns. Some respondents viewed an FTA with Australia as an opportunity to set high standards for copyright protection, including for Artists' Resale Rights. There was some opposition to having wider exceptions and limitations to copyright with a preference for maintaining the UK's current system. There was also a comment around genetic resources and concerns over the interaction with patent policy. One comment was also made about the importance of the UK retaining its flexibility to limit IP rights (as permitted under the WTO TRIPS Agreement) in order to support access to affordable medicines for lower-income countries. One respondent was also

concerned about the loss of GIs on product labelling as a result of a trade agreement with Australia.

Public sector bodies

Five public sector bodies prioritised IP and one raised it as a concern in their comments. One respondent stated that there was a need to safeguard and promote patient access to generic and low-cost medicines by resisting an extension of IP rights favouring rights holders. Several respondents were concerned that the producers in their locality might be exposed to unfair competition from producers in countries that have less IP protection. They also called for existing UK GIs to be protected in Australia, as well as a need to impose rules on origin standards to protect local brands. Other responses referenced the need for mutual respect for IP ownership in an FTA.

Investment

Overall, many respondents, across all groups, wanted to protect public services, including the NHS, by excluding them from the scope of an FTA. However, in a typical FTA, public services are contained within the services chapter and therefore we have considered relevant comments in the services section of this document. Respondents from business and business associations asked for investors' rights to be protected, including some requests for improved access to ISDS. Many respondents saw a future trade agreement giving rise to opportunities to boost investment and gave examples of what they would consider to be beneficial for the UK. Many individuals and NGO respondents raised concerns about ISDS, with the majority opposing its inclusion in a future trade agreement. Relevant comments on ISDS made in the consultation section on trade remedies and dispute settlement are also considered in this section.

Individuals

Two individual respondents viewed investment as a priority in their comments and two viewed it as a concern. One individual respondent was of the view that an FTA with Australia might encourage investment, for example, in the life sciences sector. One respondent suggested it might make it easier for companies in both countries to set up subsidiaries. One individual respondent asked for an ISDS mechanism to be excluded from an FTA, as it may give foreign investors too much power and might restrict the right of the Government to regulate in the public interest. One respondent was of the view that if an investment chapter is included in an FTA, it should help preserve public authorities' right to regulate.

Businesses

Ten business respondents raised investment as a priority in their comments and seven saw it as a concern. One business respondent was of the view that an FTA with strong investment provisions could facilitate investment, for example, in infrastructure, the green economy and regional development. Respondents asked for investment rules to be transparent, stable and predictable to ensure fair treatment of investors, as well as protect and balance the rights of consumers, business and civil society in a sustainable manner. Some business respondents stated that access to an ISDS mechanism may provide an appropriate level of protection for investors. However, respondents also commented that ISDS mechanisms can be costly and inaccessible for SMEs. Larger business respondents tended to be in favour of an ISDS mechanism. Other respondents

expected the remaining barriers to investment, such as requirements related to export or local content, to be removed and equal treatment of investors guaranteed. Several respondents highlighted a need for UK companies to have access to accurate information, eg about the partner countries' economic and regulatory environment, including taxation, to facilitate their investment decisions. In their view, lack of, or restricted access to, important information might lead to investment decision mistakes or increase investment-related risk.

Business Associations

Sixteen business associations viewed investment as a priority in their comments and six saw it as a concern. Business associations provided responses, very much in line with those from business (see previous Business section), these included calls for transparent and stable investment rules, fair treatment of investors and the removal of remaining barriers to investment. It was also suggested that investors should be allowed to transfer their investment-related capital between the UK and Australia. One respondent was of the view, that an FTA could open-up investment opportunities to UK companies, that are already available to enterprises from other countries that have FTAs with Australia. Another respondent warned that opening the UK market for investment should not be at the expense of domestic industry. Some business associations were positive about an ISDS mechanism; however, several respondents were of the view that its potential inclusion might restrict the Government's right to regulate in the public interest. Some business associations observed that ISDS mechanisms are costly and inaccessible for SMEs.

NGOs

Six NGO respondents referenced investment as a priority in their comments and six viewed it as a concern. Several NGOs asked for the right of the Government to regulate in the public interest (eg regarding working conditions, environmental and food standards, and public health) to be preserved and expressed concern that ISDS might undermine this. Some respondents were of the view that ISDS mechanisms should be excluded from an FTA. Several respondents also suggested ISDS also introduce discrimination of domestic investors compared to foreign ones and, that it might not necessarily contribute to increased investment flows. Some respondents also highlighted that its inclusion could lead to high arbitration costs for the Government to cover, irrespective of the ruling. One NGO stated that there was no need to include ISDS provisions, as both the UK and Australian investors have access to fair and impartial domestic legal systems to protect their rights. In this context, some respondents suggested alternative methods of dispute settlement or protecting investor's rights, eg state-to-state dispute settlement or WTO mechanisms. Some respondents stressed an investment chapter should follow the latest international practice, eg provisions on responsible business conduct and its inclusion in an FTA should be preceded by a broad public debate. Some respondents thought an FTA may encourage investment, for example, in research and development.

Public Sector Bodies

Five public sector body respondents viewed investment as a priority in their comments and no respondents raised it as a concern. Many respondents were of the view that there was no need to include ISDS provisions in an FTA between two developed countries with robust legal systems, as investors could turn to national tribunals if they consider their rights to have been violated, and ISDS could undermine the Government's ability to regulate in public interest. Some respondents

thought that if a dispute settlement mechanism is included in an FTA, the system should be transparent and balance the interest of investors and the public. One respondent was of the view that an FTA might open-up opportunities for investment, for example, in infrastructure.

Labour and Environment

Overall, respondents from all groups expressed similar priorities and concerns regarding labour and environment, stressing the importance of maintaining the UK's high labour and environmental standards. One of the recurring concerns was the effect that trading with Australia might have on climate change and global carbon emissions, due to the geographical distance between the UK and Australia. Respondents also stated that the free movement of professionals between the UK and Australia and ensuring MRPQs are in place should be prioritised. However, in a typical FTA these are contained within the services chapter, so relevant comments have been raised there. Respondents also made comments on human rights, public health and quality of life in this section; as they are social aspects of an FTA, relevant comments have been raised in the other issues section of this document. In this section, respondents also commented on standards beyond labour and environment. These comments have been considered in the standards section of this document.

Individuals

Forty-seven individual respondents viewed labour and environment as a priority and 23 raised it as a concern. Individuals called for labour to be prioritised in an FTA with Australia, with four individuals noting that workers' rights must be protected. The impact on wages and job security was also raised as a concern by several respondents. A recurring concern centred around the possible negative impacts that an FTA could have on the environment. Nine respondents raised concerns over the impact that increased transport activity between Australia and the UK could have on emissions, due to the geographical distance between the two countries. This led to eight respondents calling for environmental standards to be maintained.

Businesses

Twenty-two business respondents referenced labour and environment as a priority in their comments. Four business respondents made comments on the need to harmonise labour regulations between Australia and the UK. Two businesses expressed concerns about labour and environment in their comments, including concerns about a potential negative impact on workers' rights. Some respondents perceived there to be limited alignment on labour and environmental standards between the UK and Australia. One respondent stated that a future FTA with Australia should include an environment chapter (or a sustainable development chapter) to cover environmental protections. Many comments made by businesses on the environment called for the UK's high environmental standards to be maintained as well as ensuring that the standards and regulations of both countries (UK and Australia) are aligned at the highest level.

Business Associations

Thirty-three business association respondents viewed labour and environment as a priority in their comments and 16 viewed it as a concern. Three business associations were concerned about the impact that an FTA with Australia could have on workers' rights. One business association highlighted that an FTA with Australia should recognise that economic growth, social development

and environmental protection are interlinked, noting that FTA parties should therefore agree to ensure that economic growth supports their social and environmental goals. Some respondents made specific comments relating to the protection of environmental standards, with one respondent concerned that imports might undercut existing domestic standards and increased imports and exports could potentially increase the UK's carbon footprint. Another respondent mirrored this view calling for products that are being imported from Australia to meet UK standards. One respondent raised a concern that international businesses have the potential to undercut UK farming on environmental and workplace standards and regulations.

NGOs

Twenty NGO respondents viewed labour and environment as a priority in their comments. Many respondents emphasised the need to maintain and improve workers' rights through a trade agreement with Australia. One respondent suggested that an FTA should contain commitments to respect the International Labour Organisation (ILO) labour standards and the Decent Work Agenda. Trade Union respondents were of the view that an FTA with Australia could put at risk the effective implementation of the ILO conventions, enable the exploitation of migrant workers, encourage undercutting workers' rights and lead to job losses. Three respondents noted that current EU legislation for labour rights and working conditions should be maintained or improved, with three comments calling for strong enforcement of labour rights, for example, the introduction of penalties for those who violate labour laws.

Seventeen NGOs raised concerns, with respondents highlighting that a trade agreement with Australia could undermine the UK's environmental and animal welfare standards. Another respondent viewed global sustainable development as a priority in an FTA with Australia, as they claimed this to be in line with international commitments to meet the UN Sustainable Development Goals. One respondent stated that future subsidies should give more consideration to environmental protection, sustainability and labour, as well as land use. One NGO also recommended for environmental provisions to be enforceable through adequate procedures including through citizen and civil society mechanisms.

Public sector bodies

Five public sector bodies prioritised labour and environment in their response, with five raising concerns. Two respondents were concerned that the UK's environmental standards might be negatively impacted by an FTA with Australia.

Trade Remedies and Dispute Settlement

Overall, respondents highlighted a need for an effective state-to-state dispute settlement that is accessible to all and has an effective enforcement mechanism. Most comments on dispute settlement raised in this section by respondents were in relation to Investor State Dispute Settlement (ISDS) mechanisms, however, in an FTA, ISDS is contained within the Investment chapter therefore we have considered the relevant comments there. During the consultation, trade remedies and dispute settlement were considered within the same section, however these are different policy areas contained within different chapters of an FTA. Given we have received distinct comments relating to these issues the analysis has been separated below.

Four individual respondents raised comments on trade remedies and dispute settlement as a priority and two raised it as a concern. Eleven businesses wanted the UK Government to prioritise trade remedies and dispute settlement and two had concerns. Twenty-one business association respondents raised trade remedies and dispute settlement as a priority in their feedback and 14 raised it as a concern. A total of ten NGOs wanted the UK Government to prioritise trade remedies and dispute settlement in future trade agreements (or related talks) with Australia, and 11 indicated they had concerns in these areas. One public sector body raised trade remedies and dispute settlement as a priority, while one public sector body raised these areas as a concern.

The numbers above reflect those who have highlighted trade remedies and dispute settlement as a priority or concern. The detailed analysis below focuses on the specific comments received relating to either trade remedies or dispute settlement.

Trade Remedies

Individuals

On the topic of trade remedies, one individual expressed concern about UK companies being vulnerable to dumping.

Businesses

There were four businesses which referred to or touched upon trade remedies in their responses. One stated that any UK-Australia FTA should reflect WTO trade remedies law while another stressed the importance of trade remedies in an FTA without explaining why. Two businesses expressed concerns about the cost of applying for trade remedies, indicating that the cost can be prohibitive for SMEs.

Business Associations

Ten business associations referred to or touched upon trade remedies in their responses. Most of them called for all types of WTO trade remedies provisions, that is, anti-dumping measures, countervailing duties and global safeguards, to be included in any UK-Australia FTA. Some respondents called for provisions committing the parties to applying the lesser duty rule and an economic interest test in calculating anti-dumping and countervailing duties. Specifically, those respondents called for bilateral safeguard measures which: (a) facilitate consultation between the parties before the imposition of a measure, (b) require compensation to be provided to the exporting party, or enable the exporting party to suspend equivalent concessions, and (c) provide for recourse to the FTA's dispute settlement mechanism. The same respondents stressed the importance of transparency provisions in a UK-Australia trade remedies chapter, such as notification requirements and information-sharing. Moreover, provisions related to trade remedies should be similar to the equivalent provisions in existing EU FTAs.

There was divided opinion on whether WTO trade remedies should be included in the FTA's dispute settlement mechanism or excluded (in which case WTO dispute settlement mechanism would be the only recourse). Some respondents stated that trade remedies should be excluded but did not give reasons as to why. Others argued that trade remedies should be included, given that it

typically takes quite a long time for disputes to be resolved at the WTO level. Two respondents stated that any requests to agree not to use trade remedies against Australia should be rejected.

NGOs

One NGO touched upon trade remedies in their response, calling for the rules on subsidies to be recalibrated to ensure UK producers are not undercut by Australian subsidised imports.

Public Sector Bodies

One public sector body touched upon trade remedies in its response, expressing concern regarding an increase in imports of bovine, porcine and ovine meats as a potential impact of any UK-Australia FTA, which could lead to a decrease in UK production. That respondent requested protection for domestic industry, with a preference for tariff-rate quotas.

Dispute Settlement

Individuals

Four individuals made specific comments on state-to-state dispute settlement, expressing the need for a fast track and independent dispute resolution process. There were concerns raised about losing potential future disputes with Australia and a new dispute settlement mechanism limiting future choices.

Businesses

Nine businesses commented on state-to-state dispute settlement, they would like a dispute settlement mechanism to have effective enforcement provisions. Businesses also noted the importance of negotiating a state-to-state dispute settlement mechanism that is aligned with the existing WTO model, as this will ensure both predictability and enforceability of FTA commitments. There were concerns raised about the length of time it takes to resolve a dispute, therefore businesses would like disputes, especially in urgent cases to be resolved in a speedy manner.

Business Associations

Business associations were overall relatively positive on including state-to-state dispute settlement mechanisms in any UK-Australia FTA, but wanted the process to be unbiased, transparent and robust. Some business associations would like to see the inclusion of referral to an ad-hoc arbitration panel similar to the WTO dispute settlement mechanism.

NGOs

The majority of NGO responses related to ISDS not state-to-state dispute settlement. As mentioned above ISDS-related comments have been addressed in the Investment section of this report. Other feedback argued establishing a mechanism for civil society participation and the disputes mechanisms should go further than state-to-state resolution on environmental matters.

Public sector bodies

One public sector body raised dispute settlement with none seeing it as a concern. Regarding state-to-state dispute settlement, public sector bodies would like an effective dispute resolution mechanism, especially if a 'deep commitments' FTA is concluded with Australia whereby regulations are harmonised between the parties.

Small- and Medium-sized Enterprise (SME) Policy

Common to many respondents was a recognition of the unique circumstances and barriers that SMEs face. This led to suggestions of standalone SME chapters, reducing administrative burdens and providing extra governmental support to SMEs looking to export.

Individuals

Two individual respondents raised SME policy as a priority in their comments and, two individuals saw it as a concern. The importance of a future FTA minimising administrative procedures was highlighted, with one respondent calling for a reduction to the costs that SMEs face when trading internationally. The disproportionate impact that leaving the EU could have on SMEs was also noted. Concerns focused on the potential increase in bureaucracy that an FTA between Australia and the UK might create for SMEs.

Businesses

Twelve business respondents viewed SME policy as a priority in their comments and three viewed it as a concern. Several businesses saw opportunities in a UK-Australia FTA, and it was suggested that an FTA include specific measures to support SMEs to trade. Three businesses highlighted the potential benefits of supporting UK and Australian businesses to collaborate and access government funding opportunities in both countries. Other points focused on the close connections between the UK and Australia as a good foundation on which UK SMEs could build. There was also a request from respondents for SME access to public procurement (see also comments under the Government procurement section). There were concerns around the need for greater support for SMEs to trade with Australia, access to finance for SMEs and the potential negative impact on SMEs due to a change in trading arrangements. A question was raised as to whether an FTA would equally support both countries.

Business Associations

Twenty-one business associations viewed SME policy as a priority in their comments. Some respondents identified multiple opportunities and were keen for SMEs to be given particular consideration as a group that is disproportionately affected by the cost and resources required by burdensome administrative procedures. Suggestions for how to support SMEs in a future UK-Australia FTA included a standalone SME chapter, providing SMEs with market information, simplifying and harmonising procedures across future FTAs and a greater access to professional advice for SMEs. Eleven business associations raised concerns relating to SME policy, with many responses mirroring those made by businesses. These concerns included ensuring a trade agreement benefited all parties, the lack of funding available to SMEs and the impact that changes to current trading arrangements may have on SMEs.

NGOs

One NGO respondent viewed SME policy as a priority and three saw it as a concern. The respondent noted that the Government would need to ensure sufficient focus on SMEs in any future UK-Australia FTA and protect SMEs from any negative consequences of a trade agreement. Concerns noted included the potential impact of UK unilateral implementation of grace periods on SMEs, and the impact a trade agreement may have on local SMEs and SMEs in the agricultural sector.

Public sector bodies

One public sector body referenced SMEs policy as a priority and called for a future FTA to prioritise access to resources and funding for SMEs. No public sector body raised SME policy as a concern.

Other policy issues raised by respondents

Respondents raised many points and issues that were outside the scope of the trade policy areas provided. The most frequently made points were on a FEP with the EU. Some respondents emphasised a need to reach an agreement with the EU before negotiating FTAs with other countries given the importance of the EU market for UK companies and the impact which arrangements with the EU may have on the provisions in new UK FTAs. Other respondents stated that they would prefer to remain in the EU over leaving it and negotiating a trade agreement with Australia. Respondents also expressed concerns over DIT's organisational capacity to negotiate and implement multiple new trade agreements concurrently. Others raised gender equality in FTAs and trade policy, and immigration. Remarks were also made in relation to the historical ties between the UK and Australia. Relevant comments on human rights, public health, quality of life and impact assessments that were raised in the consultation section on labour and environment have been considered in this section.

Individuals

Seventy-one individuals raised other issues as being a priority for them, while 50 viewed them as being a concern. This included concerns about animal welfare in any UK-Australia FTA. Among priorities, individual respondents expressed a general support for a trade agreement with Australia and highlighted a need to ensure that the future FTA will provide arrangements which will be fair, balanced and unbiased. Some respondents recognised benefits of a common language and historical links between the UK and Australia. An FTA with Australia was considered as an opportunity for increased trade volumes and economic growth and job creation (seven respondents). Some respondents expressed a concern that the UK may not be able to negotiate an agreement beneficial for the country, while others raised the long time needed to conclude negotiations of a new FTA. The potential negative effect that a trade agreement will have on the quality of life and health of UK citizens was also raised as a concern by one respondent.

Businesses

Twenty-five business respondents provided comments on other priorities. Some respondents expressed a preference for a FEP with the EU being prioritised above any UK-Australia FTA and ensuring that a UK-Australia FTA does not jeopardise EU trade with the UK. Nine businesses expressed general support for an FTA with Australia, with some of these respondents highlighting

a need to ensure that a future FTA will be fair and beneficial for both countries. Respondents also emphasised the benefits of a common language and historical links between the UK and Australia. Businesses also called for greater co-operation on development and research between the UK and Australia (four comments). Three businesses raised comments on ensuring high social standards including the quality of life for UK citizens. One business respondent commented on the effect of an FTA on public health, with their response focused on the need to combat global challenges such as the Ebola pandemic and they emphasised that collaboration is needed to combat these. Two respondents also raised concerns about potential negative impacts of the new trade arrangements on their supply chains.

Business Associations

Forty-eight business associations viewed other issues as being a priority. Eleven respondents expressed a general support for an FTA with Australia, with 14 emphasising a need to ensure that any UK-Australia FTA does not jeopardise the UK's trade with the EU or with other partners. Eleven respondents stressed the need to maintain current EU trade agreements, from which the UK benefits as a member state. Business associations noted that the common language and historical ties between the UK and Australia could help facilitate an FTA.

Respondents also commented on student visas and immigration. There was one respondent, in favour of expanding post-study work opportunities by transitioning the Tier 4 pilot to policy (enabling students studying for a master's degree to be able to stay for 6 months after the end of their studies). They called for the Government to consider extending this to 12-months for all and to 24-months for Science, Technology, Engineering and Mathematics (STEM) graduates. One business association respondent suggested that the UK should produce, in consultation with stakeholders, a robust Sustainability Impact Assessment (SIA) that would also include analysis of human rights. Five business associations were of the view that an agreement with Australia may have a negative impact on trade relations with the EU, with four raising concerns over the potential impacts of an FTA on the UK economy and business supply chains.

NGOs

Thirty-five NGO respondents viewed other issues as being a priority for them and 26 as being a concern. Transparency was a common theme raised by eight respondents. Eight respondents raised as a priority and also eight as a concern a need for greater release of information as any deal is negotiated and the appropriate level of parliamentary scrutiny. NGOs called for involvement of devolved administrations, while several advocated further engagement with experts, business associations and civil society organisations, and also with general public, in questions related to trade agreements and their negotiation. Several NGOs expressed concern about the potential erosion of preferential access for developing countries into the UK market, due to tariff liberalisation between the UK and Australia.

There was also a recognition that provisions across FTAs (including, for example, labour rights, IP, and procurement and regulation of public services) can have social impacts, that could be gender based. Several respondents noted that women are financially at a disadvantage in the labour market, with many raising concerns about trade liberalisation increasing the gender wage gap. It was also called for any UK FTA to protect and promote strong labour rights, as well as uphold international commitments on gender equality and other human rights. Some NGO respondents called for the monitoring of gendered impacts over time, and for impact assessments to be

conducted which cover issues including gender equality, human rights, labour rights, environment and the economic impacts of trade agreements in the UK and third countries. Many NGOs also set out that civil society should be engaged with closely on these issues.

Public sector bodies

Eight public sector bodies commented on other issues, with two respondents calling for any trade negotiations to include experts and professional bodies, and two emphasising a need for a trade agreement which would support economic growth and job creation. Two respondents stated that there should be increased co-operation in the artistic and cultural fields. Five public sector bodies raised concerns, with two respondents concerned that concessions may be made in order to conclude a trade deal with Australia quickly. Several respondents were concerned that the UK may not be able to negotiate a trade agreement with Australia that would be beneficial for the UK, and one respondent stated that there may not be enough of democratic scrutiny over the process.

Summary of campaign responses

One campaign group, *38 Degrees* encouraged their members to submit a response to the consultation.

38 Degrees <i>Submission to DIT's consultation on future trade deals</i>
<p>145,905 members submitted a response to the consultation. Of these, 52,396 respondents included specific individual comments in addition to the campaign's proposed template response.</p> <p>The template response called for the protection of the NHS in future trade agreements, expressing concerns about allowing companies from other countries to deliver NHS (healthcare) services, and undermining the principles of the NHS, removing caps on how much money companies could charge to deliver NHS services and on the potential increase in the price of medicines. The template response asked for laws to be introduced to protect the NHS in future UK trade agreements.</p>
38 Degrees <i>Additional comments</i>
<ul style="list-style-type: none">• Most additional comments made by 40,565 individuals commented on the need to protect the NHS. Respondents commented that the NHS should remain free at the point of use.• 683 comments were raised with regards to EU-Exit, with some stating their desire to stay in the EU and 90 comments raised regarding a second referendum.

We also received one petition on the consultation:

- 'Don't put our NHS up for Negotiation' – 38 Degrees - 229,699 signatures. This echoed the issues raised above, calling for the "NHS is kept out of any future trade deals after Brexit".

DIT recognises that respondents who elected to reply via a campaign hold strong views and opinions on the issues highlighted in those campaigns. For this reason, DIT has already made the following commitments:

- The Government will not compromise the high quality of British food or agricultural standards in any UK-Australia free trading relationship. We are committed to maintaining high standards on animal welfare and food safety after the UK leaves the EU.
- The NHS will never be privatised, and any future trade agreements will not change that.

- The Government will continue to ensure that decisions about public services, including the NHS, are made by the UK Governments, including the devolved administrations, and not our trading partners. Protecting the UK's right to regulate public services is of the utmost importance. The UK's public services are protected by specific exemptions and reservations in EU trade agreements and, as we leave the EU, the UK will continue to ensure that the same rigorous protections are included in trade agreements to which it is party.
- The Government will ensure that Parliament can inform the Government's approach to negotiations and scrutinise new trade agreements.
- The Government will develop an inclusive and transparent future trade policy for the UK.

There were other issues raised by respondents, which were discussed in the Government's White Paper *Preparing for our future UK trade policy*. For instance, the Government's commitment to supporting developing countries to reduce poverty through trade, including through enhancing market access, tackling barriers to trade and promoting investment to allow better uptake of trading agreements was detailed in this White Paper. In other areas flagged by respondents as a concern, the Government is already undertaking work to address many of the issues identified. For example, the Government is focused on promoting gender equality through trade, with activities planned to support these efforts.

Next Steps

The Government is carefully considering the points raised from the public consultations as it develops a new independent trade policy for the UK.

We recognise the importance of developing a trade policy that commands broad public support, with policy objectives that can be met while mitigating the concerns raised by respondents and maximising the benefits felt across UK society and its regions.

The public consultations attracted significant public interest. DIT was grateful to those who took the time to submit responses and attend events. We recognise the strength of feelings on some of the topics raised. The purpose and use of the response feedback gathered from this consultation will be to inform our overall approach to negotiating a potential new trade agreement with Australia. Decisions that are made as a result of this consultation will therefore be published alongside our negotiating objectives before potential negotiations begin. The Government also intends to keep views expressed by respondents in mind for future development and review of trade policy.

DIT worked closely with other government departments during the consultation period and subsequently to analyse the consultation feedback. Prior to entering into any formal negotiations with Australia as part of a follow-up Government Response, the Government will publish its conclusions from this consultation. The Government has also made clear that an Outline Approach, setting out the UK's high-level negotiating objectives, will also be published before negotiations commence.

In preparation for the start of any potential negotiations, DIT is undertaking a programme of work helping to shape the UK's overall approach to negotiations; considering what organisational mechanisms and structures are needed to facilitate trade negotiations and engage effectively with stakeholders throughout. Suggestions made by respondents in this consultation and issues raised will be considered as part of this work.

We will explore ways in which we can build upon the consultation engagement activity. Plans are already in place to work with a range of experts and practitioners to help shape our future trade policy and realise opportunities across the UK. The membership of the Strategic Trade Advisory Group representing a cross section of interests and expertise from civil society, businesses, workers, consumers and academics was announced on 3 April and held its first meeting on 6 June. The group provides a forum for high-level strategic discussions on trade policy matters. The Minister for Trade Policy, George Hollingbery MP, has also announced the first wave of Expert Trade Advisory Groups that will be used to ensure that detailed expert knowledge is available on specific sector and thematic areas to contribute to our policy development at a technical level. The structure and membership of these stakeholder groups will evolve over time according to the needs of the UK's trade negotiations.

We will continue to engage and take into account views from devolved governments, business, civil society groups and consumers to ensure we build a trade policy that works for the whole of the UK.

We recognise there is strong public interest around issues raised in this consultation. The Government will continue to engage with stakeholders in order to understand their concerns and to

help develop UK trade policy. The Government will continue to promote the benefits of free trade and to raise public awareness on trade and inform consumers and businesses about the opportunities that reducing barriers to trade can bring, alongside the broader economic and social welfare gains

Annex A: Consultation Questions

Provided below are the questions that were asked via the online portal on Citizen Space to the consultation on a trade deal with Australia.

Questions 1-5 were asked to all five respondent groups (Individuals, NGOs, Business, Business Associations and Public Sector Bodies). Different questions were then asked to each respondent group based on their answer to question 5, who they were responding as.

The answers to each question were either provided by a tick box or a free text box. A combination of a tick box and free text box was also used on multiple questions. These options have not been displayed below. Only the questions asked is provided.

An overview and a privacy and confidentiality section were also provided before the survey.

1. Do you consent for the voluntary information you provide in this consultation to be used as part of the Government's published consultation response?
2. Do you consent for the Department for International Trade, or organisation working on their behalf, to contact you regarding the responses you have given?

Who are you responding as?

3. What is your name (first name and surname)?
4. What is your email address?
5. Please tell us who you are responding as?
 - o An Individual/Non-Governmental Organisation/Business/Business Association/
Public Sector Body

Individual

Individual – about you.

6. Where do you currently live (your main address)?
7. What was your age at your last birthday?
8. What is your gender?
9. To which of these ethnic groups do you consider you belong?
10. Are you a member, supporter or donor of an organisation with an interest in trade?
11. If you are a member, supporter or donor of an organisation with an interest in trade, has that organisation contacted you about UK trade talks or a possible free trade agreement with Australia?

Individual – The UK's future trade relationship with Australia – priorities.

12. What would you want the UK Government to achieve through a free trade agreement (or related trade talks) with Australia, and why?
13. Which of the areas of a free trade agreement best describes the priorities that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Individual – The UK’s future trade relationship with Australia – concerns.

14. What concerns, if any, do you have about a free trade agreement (or related trade talks) with Australia, and why?
15. Which of the areas of a free trade agreement best describes the concerns that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Individual – The UK’s future trade relationship with Australia – other comments.

16. Is there anything else that you would want to say about the UK’s future trade relationship with Australia?

Non-Governmental Organisations (NGOs)

Non-Governmental Organisations (NGOs) – about you.

6. What is the name of the organisation (eg trade union, interest group, charity or academic institution) you are responding on behalf of?
7. Which area does your organisation represent?
8. How many members does your organisation represent in total?
9. Does your organisation have a presence in, or operate in, Australia?

NGOs – Questions about the UK’s future trade relationship with Australia.

10. Have any of your members been in contact with your organisation about the prospect of a free trade agreement (or related trade talks) with Australia?

NGOs – The UK’s future trade relationship with Australia – priorities.

11. What would you want the UK Government to achieve through a free trade agreement (or related trade talks) with Australia, and why?
12. Which of the areas of a free trade agreement best describes the priorities that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

NGOs – The UK’s future trade relationship with Australia – concerns.

13. What concerns, if any, does your organisation have about a free trade agreement (or related trade talks) with Australia, and why?
14. Which of the areas of a free trade agreement best describes the concerns that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

NGOs – The UK’s future trade relationship with Australia – other comments.

15. Is there anything else that you would want to say about the UK’s future trade relationship with Australia?

Businesses

Businesses – about you.

6. What is the name of your business?
7. What is your Company Number with Companies House?
8. Is your business a subsidiary of a company whose headquarters are based outside the UK?
9. If your business is a subsidiary of a company whose headquarters are based outside the UK, in which country is your parent company's headquarters?
10. Approximately how many employees are currently on your business's payroll in the UK across all sites?
11. Does your business currently employ people in Australia?
12. In what sector does your business predominantly operate in?

Businesses – Exporting, Importing and Investment.

13. Which of the following has your business done or tried to do outside the EU in the last 12 months?
14. Which of the following has your business done or tried to do in Australia in the last 12 months?
15. If you said you did not try to export to, import from or invest in countries outside the EU, or specifically to Australia, is this something that you would like to do in the future?
16. If you said you have (or attempted to) export to, import from, or invest in countries outside the EU, including Australia, did you get assistance from the UK Government in any form?
17. What existing government or business association-led initiatives, if any, support you in doing business with Australia?

Businesses – The UK's future trade relationship with Australia – priorities.

18. What would you/your business want the UK Government to achieve through a free trade agreement (or related talks) with Australia? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.
 - Tariffs – What would you want the Government to achieve in this area?
 - Rules of Origin – What would you want the Government to achieve in this area?
 - Custom Procedures – What would you want the Government to achieve in this area?
 - Product Standards, Regulation and Certification Information – What would you want the Government to achieve in this area?
 - Sanitary and Phytosanitary Measures – What would you want the Government to achieve in this area?
 - Services Trade – What would you want the Government to achieve in this area?
 - Digital – What would you want the Government to achieve in this area?
 - Competition – What would you want the Government to achieve in this area?
 - Public Procurement – What would you want the Government to achieve in this area?
 - Intellectual Property – What would you want the Government to achieve in this area?

- Investment – What would you want the Government to achieve in this area?
 - Social, Labour and Environment – What would you want the Government to achieve in this area?
 - Trade Remedies and Dispute Settlement -- What would you want the Government to achieve in this area?
 - Small- and Medium-sized Enterprises (SME) Policy – What would you want the Government to achieve in this area?
 - Other - What would you want the Government to achieve in this area?
19. Which of these areas is your top priority? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Businesses – The UK's future trade relationship with Australia – concerns.

20. What would be your concerns about a free trade agreement (or related talks) Australia be? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.

- Tariffs – What would your business's concerns be, if any, in this area?
- Rules of Origin – What would your business's concerns be, if any, in this area?
- Custom Procedures – What would your business's concerns be, if any, in this area?
- Product Standards, Regulation and Certification Information – What would your business's concerns be, if any, in this area?
- Sanitary and Phytosanitary Measures – What would your business's concerns be, if any, in this area?
- Services Trade – What would your business's concerns be, if any, in this area?
- Digital – What would your business's concerns be, if any, in this area?
- Competition – What would your business's concerns be, if any, in this area?
- Public Procurement – What would your business's concerns be, if any, in this area?
- Intellectual Property – What would your business's concerns be, if any, in this area?
- Investment – What would your business's concerns be, if any, in this area?
- Social, Labour and Environment – What would your business's concerns be, if any, in this area?
- Trade Remedies and Dispute Settlement -- What would your business's concerns be, if any, in this area?
- Small- and Medium-sized Enterprises (SME) Policy – What would your business's concerns be, if any, in this area?
- Other - What would your business's concerns be, if any, in this area?

21. Which of these areas is your top concern? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Businesses – The UK's future trade relationship with Australia – other comments.

22. Is there anything else that you would want to say about the UK's future trade relationship with Australia?

Business Association

Business Association – about you.

6. What is the name of the trade association or businesses representative organisation that you are responding on behalf of?
7. What business area does your organisation represent?
8. How many businesses does your group represent in total?
9. Do you have a presence in, or operate in, Australia?

Business Association – Exporting, Importing and Investment.

10. Approximately what proportion of your members export to / invest in Australia?
11. Approximately what proportion of your members have indicated they would like to do more exporting to / investment in Australia?
12. Approximately what proportion of your members import from / have investment from Australia?
13. Approximately what proportion of your members have indicated they would like to do more importing from / seek investment from Australia?
14. What existing UK Government or regional / business group-led initiatives, if any, have your members said support them in doing business with Australia?

Business Association – Questions about the UK's future trade relationship with Australia.

15. Have your members been in contact with your organisation about the prospect of a free trade agreement (or related trade talks) with Australia?

Business Association – The UK's future trade relationship with Australia – priorities.

16. What would your organisation want the UK Government to achieve through a free trade agreement (or related talks) with Australia? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.
 - Tariffs – What would you want the Government to achieve in this area?
 - Rules of Origin – What would you want the Government to achieve in this area?
 - Custom Procedures – What would you want the Government to achieve in this area?
 - Product Standards, Regulation and Certification Information – What would you want the Government to achieve in this area?
 - Sanitary and Phytosanitary Measures – What would you want the Government to achieve in this area?
 - Services Trade – What would you want the Government to achieve in this area?
 - Digital – What would you want the Government to achieve in this area?
 - Competition – What would you want the Government to achieve in this area?
 - Public Procurement – What would you want the Government to achieve in this area?
 - Intellectual Property – What would you want the Government to achieve in this area?
 - Investment – What would you want the Government to achieve in this area?

- Social, Labour and Environment – What would you want the Government to achieve in this area?
 - Trade Remedies and Dispute Settlement – What would you want the Government to achieve in this area?
 - Small- and Medium-sized Enterprises (SME) Policy – What would you want the Government to achieve in this area?
 - Other - What would you want the Government to achieve in this area?
17. Which of these areas is your top priority? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Business Association – The UK's future trade relationship with Australia – concerns.

18. What would your organisation's concerns about a free trade agreement (or related talks) with Australia be? The options below are structured around the typical content of a free trade agreement. Where possible please provide information on the importance of this issue to your business.
- Tariffs – What would your organisation's concerns be, if any, in this area?
 - Rules of Origin – What would your organisation's concerns be, if any, in this area?
 - Custom Procedures – What would your organisation's concerns be, if any, in this area?
 - Product Standards, Regulation and Certification Information – What would your organisation's concerns be, if any, in this area?
 - Sanitary and Phytosanitary Measures – What would your organisation's concerns be, if any, in this area?
 - Services Trade – What would your organisation's concerns be, if any, in this area?
 - Digital – What would your organisation's concerns be, if any, in this area?
 - Competition – What would your organisation's concerns be, if any, in this area?
 - Public Procurement – What would your organisation's concerns be, if any, in this area?
 - Intellectual Property – What would your organisation's concerns be, if any, in this area?
 - Investment – What would your organisation's concerns be, if any, in this area?
 - Social, Labour and Environment – What would your organisation's concerns be, if any, in this area?
 - Trade Remedies and Dispute Settlement – What would your organisation's concerns be, if any, in this area?
 - Small- and Medium-sized Enterprises (SME) Policy – What would your organisation's concerns be, if any, in this area?
 - Other - What would your organisation's concerns be, if any, in this area?

19. Which of these areas is your top concern? (the survey listed the 14 policy areas, plus Other and Don't Know. The respondent could select only one).

Business Association – The UK's future trade relationship with Australia – other comments.

20. Is there anything else that your organisation would want to say about the UK's future trade relationship with Australia?

Public Sector Bodies

Public Sector Bodies – about you.

6. What is the name of the public sector body you are responding on behalf of?
7. What area does your public sector body represent?
8. Does your public sector body have a presence in, or operate in, Australia?

Public Sector Bodies – Questions about the UK's future trade relationship with Australia?

9. Have any of your members been in contact with your public sector body about the prospect of a free trade agreement (or related trade talks) with Australia?

Public Sector Bodies – The UK's future trade relationship with Australia – priorities.

10. What would you want the UK Government to achieve through a free trade agreement (or related trade talks) with Australia, and why?
11. Which of these areas of a free trade agreement best describes the priorities that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Public Sector Bodies – The UK's future trade relationship with Australia – concerns.

12. What concerns, if any, does your public sector body have about a free trade agreement (or related trade talks) with Australia, and why?
13. Which of these areas of a free trade agreement best describes the concerns that you have outlined above? (the survey listed the 14 policy areas plus Other. The respondent was able to select all that apply).

Public Sector Bodies – the UK's future trade relationship with Australia – other concerns.

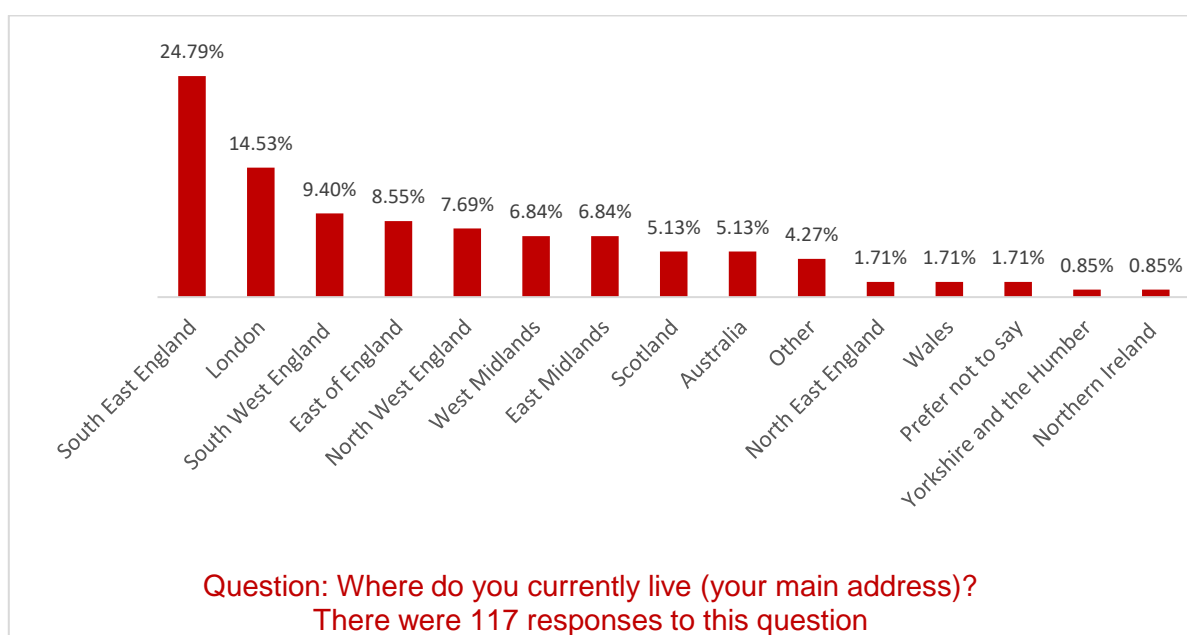
Is there anything that you would want to say about the UK's future trade relationship with Australia?

Annex B: Demographics

Individual respondents' demographic profile

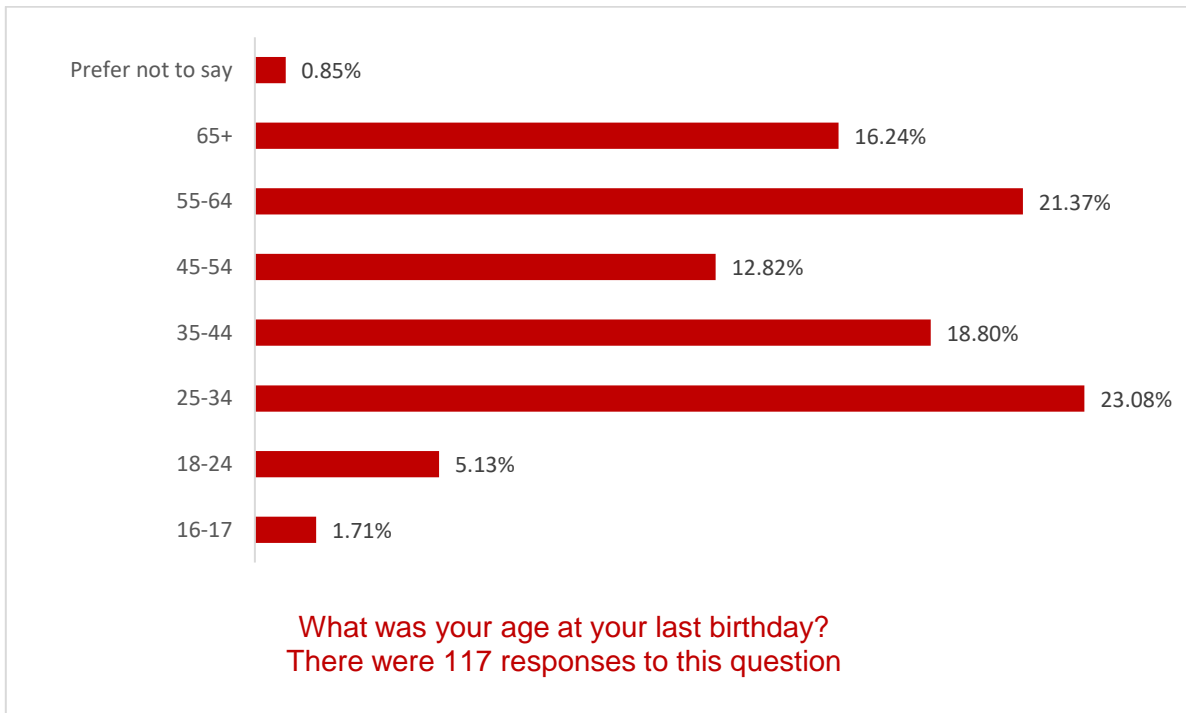
1. The geographical location of respondents varied with responses received from across the UK and Australia. The highest levels of participation were in South East England making up nearly a quarter (24.79 per cent) of responses. Around one in twenty (5.13 per cent) of responses came from respondents based in Australia. See Figure 1 for an overview of the respondents' location.

Figure 1: Location of individuals who responded to the consultation online



2. The age of respondents to the Consultation Portal varied with 29.92 per cent of respondents under the age of 35. See Figure 2 for a breakdown of the ages of respondents.

Figure 2: Age of individuals who responded to the consultation online



- Four out of five (79.49 per cent) individuals who responded online were male, with nearly one in five (17.95 per cent) female. The reason for the lower response rate from women is unclear and the Government has identified a need to review our engagement strategy to ensure any future consultations have greater participation from women. The Government is committed to creating a framework for trade that supports female exporters and upholds gender equality.

Table 8: Gender of individuals who responded to the consultation online

Gender Group	Percentage of Responses
Male	79.49%
Female	17.95%
Other	0.85%
Prefer not to say	1.71%

Question: What is your gender?
There were 117 responses to this question

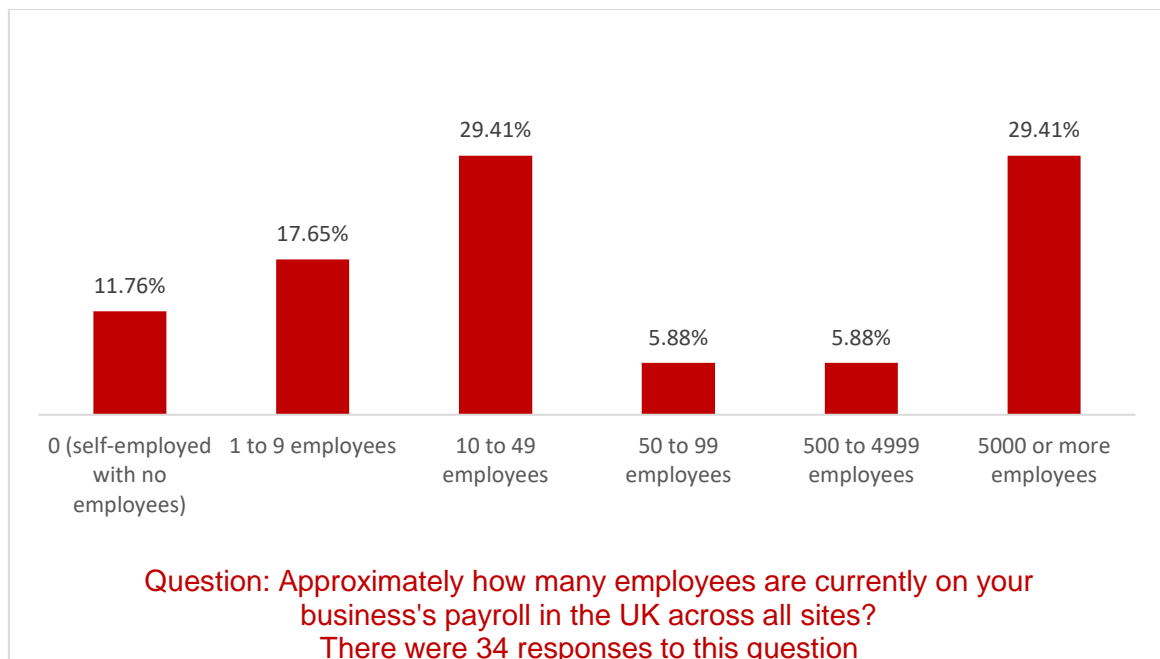
Organisation respondent profile

Figure 3. Total number of members that the NGO represents.



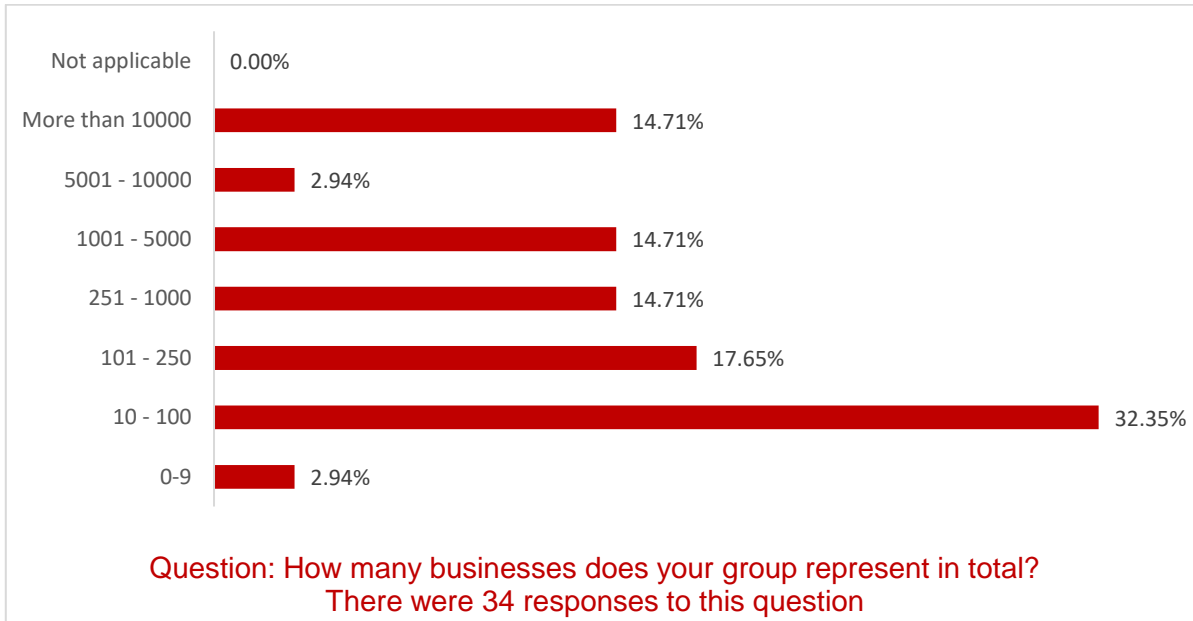
4. Over 60 per cent (62.96 per cent) of NGOs who responded online had more than 1,000 members. Around 10 per cent (7.40 per cent) of organisations had 100 or less members.

Figure 4. Number of UK employees per business



5. 17.65 per cent of businesses who responded online had 1-9 employees. Around 30 per cent (29.41 per cent) of businesses had 5,000 or more employees.

Figure 5. Number of businesses the business associations represents



6. Just under one third (32.36 per cent) of businesses associations who responded online represented 251 or more businesses.

Annex C: Glossary

This glossary contains general descriptions of some commonly used trade and investment terms. Some of the terms have meanings that vary within different areas of trade and investment, or between different trade and investment agreements. The descriptions in this glossary are intended to provide a general approximation of these meanings and therefore will not always align with legal definitions or references in legal texts; or with the meaning of these terms in a particular context or area of trade.

Term	Definition/Description
Accession	Means to join or become a part of – eg accession to an international trade agreement by new members, accession to an international organisation or a state’s accession to a multilateral treaty already negotiated and signed by other states.
Anti-dumping duty	Under WTO rules, countries can counteract the practice of ‘dumping’ by imposing additional duties on imported goods found to be ‘dumped’ and causing injury to domestic producers, after having conducted a domestic investigation (see also Dumping below).
Applied tariffs/Applied rate	Duties that are actually charged on imports of goods. These can be the same, below, but not above, the bound rates (see also Bound Tariffs/rates).
Artist’s Resale Rights	The Artist’s Resale Right (ARR) is a specific form of copyright, which gives the author of an original work of art the entitlement to royalties each time one of their works is sold through an art market professional (such as an auction house or art gallery). This royalty has the same duration as copyright; life or the author plus 70 years.
Bilateral agreement	An agreement negotiated between two sides. One or both sides could be made up of multiple states, eg the EU-CARIFORUM FTA which has more than 40 parties.
Bilateral Investment Treaty (BIT)	An agreement between two states in which each state affords certain protections to the other state’s investors and their investments. This normally includes an obligation not to discriminate or expropriate without compensation. Investors may be provided with a right to enforce these provisions through Investor-State Dispute Settlement, ISDS (defined below). Modern FTAs often include a separate Investment chapter which will have similar provisions.
Bound Tariffs (also known as bound rates)	The maximum rate of duty (ie tax) that can be applied by a WTO Member to an imported product from another WTO Member. Each WTO member has a goods schedule in which it sets out its commitment to these most favoured nation rates.

Business Representative Organisation (BRO)	An administrative body who acts for or on behalf of businesses they represent. Usually runs a membership programme.
CE marking	A certification mark on products traded on the extended Single Market in the European Economic Area (EEA). 'CE' signifies that the product has been assessed and meets the EU's safety, health and environmental protection requirements.
Commercial presence	In the services trade context, refers to having an office, branch or subsidiary in a foreign country. It refers to mode 3 supply of services (see also Mode of supply for services).
Common market / single market	This is a deeper level of economic integration than an FTA. It is a free trade area established between states to give free movement of goods (without tariff and quotas), services, capital and labour between them.
Competition	Ensuring businesses are treated fairly in each other's markets, including the application of competition law, the role of state-owned enterprises and the use of state aid and subsidies.
Competitive Tendering	Competitive tendering is a procurement method where firms bid for the right to run a service or gain a certain contract.
Conformity Assessments	Tests on goods and services to see if they meet the standards required by the country they are to be sold in. In the UK, these tests are carried out by various assessment bodies accredited by the UK Accreditation Services (UKAS).
Cost, Insurance and Freight (CIF)	A recognised international trading term (see Incoterms) meaning the value of goods, including insurance of the goods and transport to the point where they are lifted over the ship's rail at the port of importation. The equivalent for transport other than sea is CPT (cost paid to).
Countervailing Measure (CVM)	Additional duties that WTO rules authorise countries to impose on imported goods to offset state subsidies received in the country of export after having conducted a domestic investigation and establishing that the subsidised imports are causing injury to the domestic industry.
Crypto-assets	Crypto-assets or 'cryptocurrency' are cryptographically secured digital representations of value or contractual rights that can be stored, transferred or traded electronically eg Bitcoins.
Cumulation	When determining the origin of goods for customs purposes, this means the capacity to include materials and/or processing from other countries as qualifying content in determining if an imported good is an 'originating good' and consequently qualifies for preferential tariff treatment.

Customs authority	<p>A government body that administers laws and regulations relating to goods crossing a border, particularly import, export, movement and storage of goods. This can be by:</p> <ol style="list-style-type: none"> 1) Collecting duties and taxes. 2) Controlling import & export of restricted goods, eg animals, and weapons. <p>In the UK, Customs functions are undertaken by HM Revenue & Customs and Border Force.</p>
Customs Duty	A charge imposed by a country on the import or export of goods.
Customs procedures	Processes and procedures applied by customs authorities to control the export, import and transit of goods. Their improvement and simplification may lower costs and facilitate trade.
Customs union	Distinct from agreements on regulatory alignment, or single market regulatory integration, a customs union treats two or more countries as a single customs territory, eliminating duties and most other restrictive measures on substantially all trade in goods between its members, and collectively applying substantially the same duties and other measures to trade in goods from third countries.
Designation of Origins	See Geographical Indications.
Dispute settlement	The term is commonly used in reference to the formal state to state mechanism for resolving disputes where one or more parties consider that there has been a breach of obligations under the relevant international trade agreement and it has not been possible to resolve the dispute informally.
Distortion	This refers to a situation in which prices and production are higher or lower than levels that would usually exist in a competitive market.
Domestic support	Where a country acts to maintain producer prices at levels above those dominant in international trade.
Dumping	Dumping occurs when goods are exported at a price less than their 'normal value', generally meaning they are exported for less than they are sold in the domestic market or are sold in export markets below the cost of production. WTO rules authorise action to counteract the practice of dumping when dumped imports are shown to cause injury to domestic producers (see Anti-Dumping Duty).
Duty-Free Quota-Free (DFQF) access	This refers to preferential market access for goods, free of import duties or quotas. DFQF on a lasting basis for all "least developed countries" or "LCDs" is included as a target in the UN Sustainable Development Goals. DFQF can be offered

	unilaterally to developing countries, under the WTO 'Enabling Clause'.
Economic Operator Certification	Documentation for the authorisation of a party involved in the international movement of goods in whatever function that has been approved by a national customs administration.
Electronic commerce (e-commerce)	Production, advertising, sale and distribution of products via telecommunications networks.
Environmental Goods Agreement (EGA) / Green Goods	A proposed agreement being negotiated by a group of WTO members seeking to end tariffs for environmentally beneficial products.
European Patent Convention	The European Patent Convention is a multilateral treaty finalised in 1973 establishing the European Patent Organisation, an intergovernmental organisation (non-EU body) that grants European patents.
Excise Duty	A tax or duty on the manufacture of goods. Excise applies in the UK to goods which contain alcohol, mineral oils or tobacco. The charge to excise is payable on purchase or importation.
Ex works	A recognised international trading term (see Incoterms) meaning the value of goods at the point that they left the factory without the addition of any transport, insurance or other costs.
Fair dealing	'Fair dealing' is a UK concept and relates to limited situations set out in UK legislation where the use of a work, protected by copyright, does not require permission or a licence from the rightsholder so long as the use is also considered 'fair'. There is no statutory definition of fair dealing - it will always be a matter of fact, degree and impression in each case.
Fair use	'Fair use' is a defence against a claim of copyright infringement in the US. It constitutes any copying of copyrighted material done for a limited and 'transformative' purpose, such as to comment upon, criticise or parody a copyrighted work.
Financial Technology (FinTech)	Providing or enabling financial services using software and modern technology
Food security	Refers to a situation where the nutritional needs of a country or population are met consistently.
Foreign Direct Investment (FDI)	Investment by an entity in a foreign operation, or establishment of a new operation in another country ("greenfield investment"). Foreign Direct Investment implies significant control of the operation by the foreign entity.
Free circulation	A customs status relating to goods which have had all the taxes and duties paid, are not subject to any other restriction or

	prohibition and can therefore move freely within the relevant customs territory.
Free Trade Agreement (FTA)	A treaty among two or more countries to form a free trade area. This means having zero tariffs (or reduced tariffs) and reducing other regulatory restrictions on trade in substantially all goods and/or services.
Free trade area	Describes territories that have liberalised trade between them in most areas of trade in goods (similar arrangements for trade in services are known as economic integration agreements). Each participating territory applies its own independent trade policy with territories that are not part of the free trade area.
GATS	General Agreement on Trade in Services, a WTO agreement governing trade in services.
GATT	General Agreement on Tariffs and Trade, a WTO agreement governing trade in goods.
Generalized System of Preferences (GSP)	Measures applied by developed countries granting unilaterally preferential (reduced or nil rate) tariffs to imports from developing countries.
Geographical Indications (GIs)	An identification of a product from a particular country, region or locality where a given quality, reputation or another characteristic of the product is essentially attributable to the place where it is produced. For instance, 'Cornish Pasty', 'Welsh Lamb', 'Scotch Whisky' or 'West Country Farmhouse Cheddar Cheese' are UK GIs.
Government procurement	Procurement by government or other public entities of goods and services from the private sector. This usually covers both goods and services, and purchasing, leasing and acquiring by other commercial means.
Government Procurement Agreement (GPA)	A plurilateral WTO agreement, currently among 19 parties, covering the procurement of goods and services by governments and other public authorities.
Gravity model of trade	The prediction of joint trade flows based on the economic sizes and distance between two states. GDP measurements are often used to measure economic size.
Green Finance	Financial instruments or investments in environmental and sustainable projects and infrastructure
Harmonized System (HS)	Forms the basis of how most countries describe and classify goods for the purpose of applying customs tariffs. A system, managed by the World Customs Organisation, that gives different categories of goods a 6-digit number so their characteristics can be recognised and understood.

Import Entry Transaction Fee	The payment charged to process and risk assess imported goods.
Import licensing	Administrative procedures requiring the submission of an application or other documentation (other than those required for customs purposes) to the relevant administrative body as a prior condition for importation of goods.
Import quota	A trade restriction that sets a limit on the quantity of a good that can be imported into a country. Import quotas are generally prohibited by the GATT, other than in limited circumstances.
Incoterms	International commercial terms that are standard terms developed by the International Chambers of Commerce and in common use that define the responsibilities of the seller and the buyer for the sale and delivery of goods. Examples include ex works, FCA (free carrier), CIF (cost insurance and freight), DDU (delivered duty unpaid) and DDP (delivered duty paid).
Intellectual Property (IP)	Creations of the mind, such as inventions, literary and artistic works, designs, and symbols, names and images used in commerce. These creations are protected by law by a variety of intellectual property rights such as patents, copyright, trade marks, design rights and geographical indications.
Investor State Dispute Settlement (ISDS)	A mechanism that allows a foreign investor to bring legal proceedings and seek compensation from a state, if the state has breached its obligations under a Bilateral Investment Treaty (defined above) or an Investment chapter in an FTA. The legal proceedings are usually brought via an arbitration process that is independent of each state's domestic courts.
Inward Processing Relief (IPR)	A customs procedure that allows goods to be temporarily imported duty-free on the condition that they are to be processed and re-exported.
Labour and Environment	In the context of a trade agreement, protection of workers and the environment, consistent with international commitments of a country.
Market access	Conditions set by governments to control which goods or services can or cannot enter their domestic market.
Mode of supply of services	This describes how international trade in services is supplied and consumed, with mode 1: cross - border supply (eg a user in country A receives services from abroad through its telecommunications or postal infrastructure); mode 2: consumption abroad (eg nationals of country A travel or move to country B as tourists, students, or patients to consume the services); mode 3: commercial presence (eg the service is provided within country A by a locally-established affiliate, subsidiary, or representative office of a foreign-owned and controlled company in country B); and mode 4: movement of

	<p>natural persons (eg a national of country B provides a service within country A as an independent supplier (like a consultant or health worker) or employee of a service supplier (like a consultancy firm or construction company)).</p>
<p>Most Favoured Nation (MFN)</p>	<p>A non-discrimination principle enshrined in many WTO rules that prohibits a WTO member from treating some WTO members more favourably than others. The MFN obligation requires each WTO member, in its trade with all other WTO members, to give the best (“most-favoured”) treatment that it accords in trade with any other WTO member. If, for example, a country lowers tariffs on goods from India, it must also do so on similar goods from Argentina. Exceptions to the MFN principle exist under WTO law, such as in the form of Customs Unions, Free Trade Agreements, Generalized System of Preferences and certain trade remedies.</p> <p>FTAs often contain their own MFN commitments between the treaty partners.</p> <p>Bilateral Investment Treaties also include MFN obligations to investors and their investments from each participating state (party). Under MFN, a host state may not treat an investor from a BIT party less favourably than it does a foreign investor from another country.</p>
<p>Multilateral agreement</p>	<p>An agreement among several countries. At the WTO, multilateral agreements normally refers to agreements reached by all WT members.</p>
<p>Mutual Recognition Agreement (MRAs)</p>	<p>An international agreement by which two or more countries agree to recognise one another's conformity assessments (see conformity assessments above).</p>
<p>Mutual Recognition of Professional Qualifications (MRPQ)</p>	<p>Enables individuals to have their professional qualifications recognised in a state other than the one in which the qualification was obtained.</p>
<p>National Treatment</p>	<p>A non-discrimination principle enshrined in many WTO rules that prohibits a WTO member from treating imported goods or foreign services and services suppliers less favourably than domestic goods or services and services suppliers in its domestic market. The national treatment obligation helps ensure imported goods and services are not unfairly disadvantaged compared with their domestic counterparts. Such obligations may also be included in FTAs between the country parties.</p> <p>Bilateral Investment Treaties also usually contain provisions that parties should not discriminate between domestic and foreign investments.</p>

Natural persons	Refers to people, as distinct from juridical persons such as companies and organisations.
Non-Tariff Barriers (NTBs) or Non-Tariff Measures (NTMs)	Any policy that restricts exports or imports other than a simple tariff.
North America Free Trade Agreement (NAFTA)	North American Free Trade Agreement, comprising Canada, Mexico and the US. This FTA may be replaced by the United States-Mexico-Canada Agreement (USMCA).
Outward Processing Relief	A customs procedure that allows goods to be temporarily exported for processing with goods in another country and then re-imported. On re-importation the element that constitutes the original exported goods in the final imported product are imported free from duty.
PBS	Professional and business services
Plurilateral agreement	An agreement between more than two parties. At the WTO, plurilateral agreements typically refer to agreements reached by several, but not all, WTO members.
Products standards, regulations and certification	<p>'Standards' are documents developed through consultation and consensus which describe a way of, for example, making a product, managing a process, or delivering a service. Compliance with standards is not mandatory. Typically, they are not set or controlled by government or legislators but can be used by legislators to establish a basis for compliance with the law. The term 'standard' is also used informally to refer to a level of quality or attainment.</p> <p>'Regulations' are legal requirements. In the context of international trade, the term 'Technical Regulations' is used frequently in trade agreements when addressing 'technical barriers to trade'. Technical Regulations are mandatory requirements set out in law – they are controlled by governments and legislators.</p> <p>Certification is the provision by an independent body of written assurance (eg a certificate) that the product, service or system in question meets specific requirements.</p>
Protected Geographical Indications	See Geographical Indications.
Quantitative Restrictions (QRs)	Specific limits on the quantity or value of goods that can be imported (or exported) during a specific time period).
Red tape	Excessive regulation or rigid conformity to formal rules that is considered redundant or bureaucratic and hinders or prevents action or decision-making. In trade relations, it imposes an administrative burden on economic operators that will frequently involve additional costs and may have the effect of limiting trade.

Regional Trade Agreement (RTA)	A free trade agreement between a group of countries. Although originally used to describe such agreements when concluded among countries that shared common borders or were located within the same region, it is now often used more generally. For example, in mega-regional free trade agreements such as the CPTPP, the parties do not all border each other.
Regional Value Content (RVC)	A percentage that indicates to what extent a good is produced in the producer's local region. This can be affected by the origin of the good's components or materials.
Regulatory Data Protection	A period during which Company B cannot refer to data produced by Company A to support B's marketing authorisation for a pharmaceutical (generic) or agrochemical (eg a pesticide) drug. This authorisation is a requirement for the generic drug to reach markets.
Rules of Origin (RoO)	Rules used to determine where goods are "from", for example, where they have been produced or had substantial work done to them. This is used in determining appropriate tariff rates, access to preferential trade arrangements or application of trade sanctions.
Safeguard Measures	Actions taken to protect a specific industry from an unexpected build-up of imports. They are generally governed by Article 19 of GATT and the Agreement on Safeguards.
Sanitary and Phytosanitary Measures (SPS)	Measures to ensure that food is safe for consumers, and to prevent the spread of pests or diseases among animals and plants.
Schedule	In WTO context, this is a WTO member's list of commitments to other WTO members regarding how much market access it is prepared to offer and its bound tariff rates.
Small- and Medium-sized Enterprises	Businesses with fewer than 250 employees.
Small- and Medium-Sized Enterprises (SME) Policy	Policy designed in a way which supports Small- and Medium-Sized businesses.
Special and Differential Treatment	WTO agreements contain special provisions which give developing countries special rights and allow other members to treat them more favourably than non-developing members.
Supply chain	The sequence of processes involved in the production and distribution of a good.
Sustainable Development	Development that meets the needs of the present generations without compromising the ability of future ones to meet their own needs. It contains three pillars: economic development, social development and environmental protection.

Tariff binding	A commitment by a country not to increase a customs duty beyond a specified level. (See Bound Tariffs).
Tariff Rate Quota (TRQ)	The application of a higher tariff or tax on certain goods once an agreed quota (amount) of imports is reached.
Tariffs	Refers to customs duties on imports of goods, levied either as a percentage of value or on the basis of a formula (eg 10 per cent or £7 per 100 kg).
Technical Barriers to Trade (TBT)	These are regulations, standards, testing and certification procedures applied to imports and exports which could obstruct trade. The WTO's TBT Agreement aims to ensure that these do not create unnecessary obstacles to trade.
Trade liberalisation	The removal or reduction of restrictions or barriers to trade.
Trade remedies	Measures which allow WTO members to operate a safety net and protect domestic industry from injury caused by unfair trading practices or from injury caused by surges in imports. They are taken in response to subsidies, dumping and import surges. These usually take the form of additional duties on those imports.
Transatlantic Trade and Investment Partnership (TTIP)	The Transatlantic Trade and Investment Partnership is a proposed trade agreement between the European Union and the United States.
Treaty	A treaty is an agreement under international law between states or international organisations.
WTO	The World Trade Organization.
WTO Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPs)	The Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPs) is the principal WTO agreement on intellectual property (IP) rights and applies to all WTO members. It covers key types of IP, including copyright, trade marks, geographical indications and patents and provides for the minimum standards of IP protection that each member needs to provide.
WTO Trade Facilitation Agreement	The WTO agreement which aims to simplify, modernise and harmonise procedures and controls governing the movement of goods across borders by WTO members.

The Department for International Trade (DIT) helps businesses export, drives inward and outward investment, negotiates market access and trade deals, and champions free trade.

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