

**Submission to the Department of Foreign
Affairs and Trade on the Australia-United
Kingdom Free Trade Agreement**

WOOLPRODUCERS
AUSTRALIA

Australia-UK FTA Coordinator
Regional Trade Agreements Division
Department of Foreign Affairs and Trade
RG Casey Building
John McEwen Crescent
Barton ACT 0221

Via email ukfta@dfat.gov.au

11 August 2020

Australia-United Kingdom Free Trade Agreement

WoolProducers Australia welcomes the opportunity to make a submission to the Department of Foreign Affairs and Trade on the Australia-United Kingdom Free Trade Agreement (the A-UK FTA).

WoolProducers Australia is the peak industry council for the wool industry. Our membership is comprised of the industry's commercial, superfine and stud breeding sectors. WoolProducers is nationally representative through our State Farming Organisation members and three democratically elected Independent Directors. Our policy areas include animal health and welfare, biosecurity, sustainability, pest management control, natural resource management, drought policy, emergency animal disease outbreak preparedness, trade and market access, and industry development including research, development and extension.

The United Kingdom (UK) is a significant market for Australian wool, with 1.5kt of greasy wool equivalent exported in 2018-19 worth \$16.3 million (ABARES 2020). In 2018, Australia exported 119 tonnes of wool tops and other combed wool (except combed fragments) to the UK (www.resourcetrade.earth). We therefore support a A-UK FTA that is beneficial for the Australian wool industry, and seek duty-free, quota-free access for wool into this important market.

Australian wool is a different type and quality to that produced domestically in the UK. Our wool is finer and used to make fine apparel, whereas wool grown in the UK is of a higher micron (coarser) and used for traditional tweed jackets and interior products, such as carpets. Therefore, we are well-placed to serve the needs of UK wool buyers as we produce wool they cannot produce themselves.

Other differences between production systems and regulatory settings are outlined in our submission and highlight the benefits of a free trade agreement that is favourable for Australian wool. To this point, the Australian Government must not ratify a A-UK FTA that detracts from Australia's capacity to adopt and maintain standards on animal health and welfare, biosecurity, environment, or sustainability practices and regulation that are appropriate to Australian conditions. Australia upholds high standards across these policy settings that are based on unbiased scientific evidence and supported through government regulation and/or industry assurance schemes.

Should you wish to discuss our submission further, please contact WoolProducers Australia General Manager, Ashley Cooper on 0455 442 776 or via email (acooper@woolproducers.com.au).

Yours Sincerely,



Jo Hall
Chief Executive Officer

Contents

List of recommendations	1
The Australian wool industry	2
The United Kingdom sheep industry.....	3
Comparison of Australian and United Kingdom wool	Error! Bookmark not defined.
Goods market access (tariffs and quotas)	3
Biosecurity	4
Equivalency	4
Animal welfare	5
Antimicrobial resistance	5
Environment & sustainability.....	7
Subsidies	8
Wool payment systems.....	9
Agricultural labour	10
Conclusion.....	11
Appendix 1: Change in commodity tariffs under UK Global Tariff.....	12

List of recommendations

Recommendation 1: That the A-UK FTA should bind tariffs for wool and wool tops at zero, and eliminate tariffs for associated products.

Recommendation 2: That the Australian Government upholds Australia's existing biosecurity standards and regulations, and their enforcement, when negotiating and concluding the A-UK FTA.

Recommendation 3: That the Australian and United Kingdom Governments recognise the high standards upheld by both parties across animal welfare, antimicrobial resistance, environment and sustainability.

Recommendation 4: That the A-UK FTA does not include animal welfare provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to animal welfare.

Recommendation 5: That the A-UK FTA does not include antimicrobial stewardship provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to antimicrobial resistance.

Recommendation 6: That the A-UK FTA does not include provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to the environment and its protection.

Recommendation 7: That the A-UK FTA does not include provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to sustainability.

Recommendation 8: That the Australian Government considers the subsidies received by UK farmers (both current and future) in A-UK FTA negotiations and ensures outcomes in the FTA are fair and equitable for Australian farmers.

Recommendation 9: That the Australian Government recognises the differences in payment systems for Australian and UK wool, and ensures that Australian farmers are not disadvantaged because of these in outcomes of the A-UK FTA.

Recommendation 10: That the Australian Government seeks provisions in the A-UK FTA that allows skilled labour exchange between Australia and the UK for wool harvesting.

The Australian wool industry

The wool industry is a significant commodity in Australian agriculture and makes a substantial contribution to the national economy. The industry employs approximately 200,000 workers¹ and contributes more than \$3.8 billion to Australian exports each year². Australia is the world's biggest producer of raw wool, which makes up 1.2 per cent of the global apparel market by volume but 8 per cent by value¹. The map below indicates the main wool production areas in Australia, many of which are in regional and remote areas³.

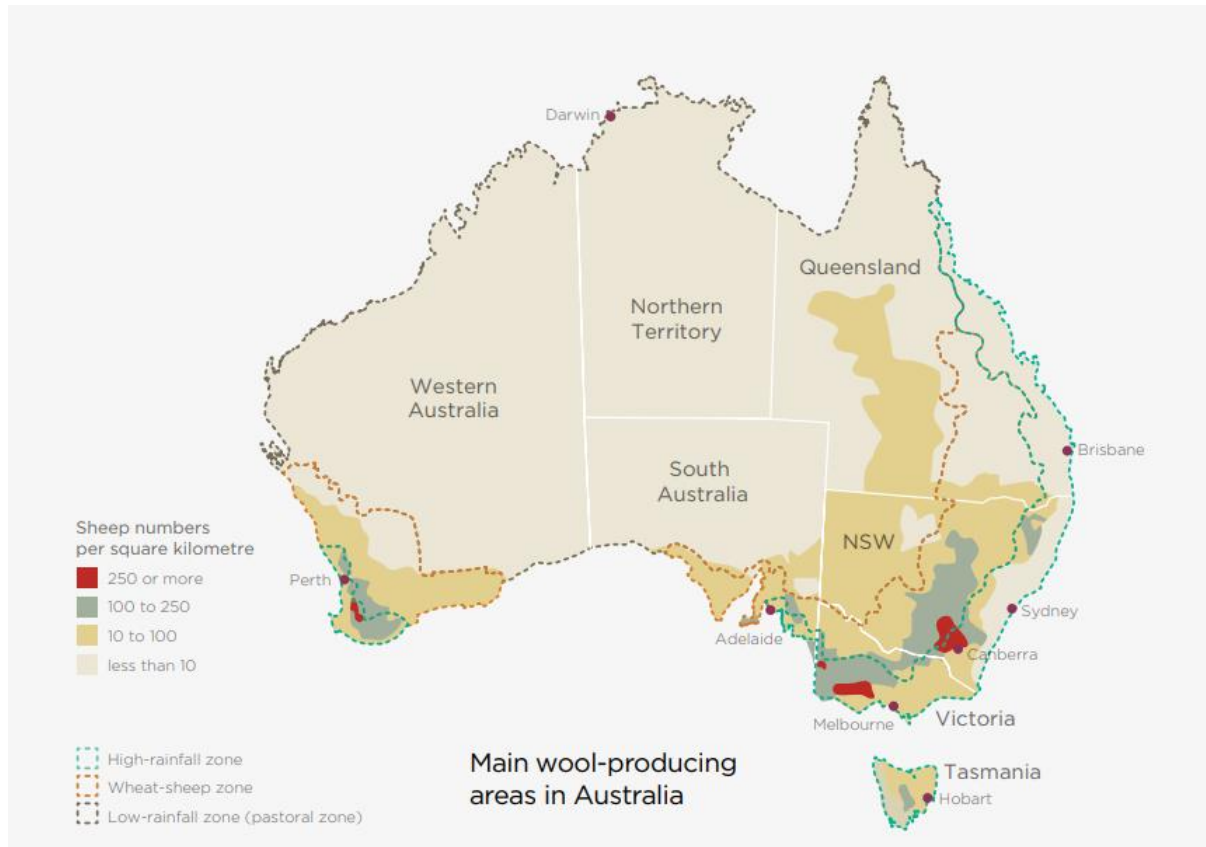


Figure 1 Main wool-producing areas in Australia³

WoolProducers is supportive of the National Farmers' Federation's (NFF) vision for Australian agriculture to become a \$100 billion industry by 2030. Opportunities for the industry to benefit from its reputation for producing safe, high quality food and fibre will enable agriculture to work towards achieving this vision. But to do so, the industry must be supported by regulatory and public policy settings that support the industry to grow. WoolProducers believes that the A-UK FTA provides a mechanism to help grow agriculture to a \$100 billion industry by 2030 and that there are opportunities for good outcomes on wool into the UK that will support this vision being achieved.

The recommendations in this submission are organised by key priorities for the wool industry in a free trade agreement with the United Kingdom. The recommendations made in this submission will benefit not only the wool industry and its contribution to the agricultural sector, but all Australians through the significant contribution wool, and the whole of agriculture, can deliver to our nation through a strong trading relationship supported by the A-UK FTA.

¹ WoolPoll, 2018

² National Council of Wool Selling Brokers and Agents, 2020

³ Adapted from www.learnaboutwool.com

The United Kingdom sheep industry

Wool is generally produced as a secondary product of sheep meat and mutton in the UK, whereas in Australia there are a significant number of farms that are dedicated to wool production with mutton being a secondary product at the end of the sheep's productive wool growing life. Table 1 below compares the UK sheep industry with the Australian sheep⁴ and wool industries.

	Australia ^{1,5}	United Kingdom ^{6,7,8}
Flock size	63 000 000 ⁴	33 337 000
Number of woolgrowers	60 000	45 000
Number of farms (holdings)	6000	72, 272
Value to economy	AUD \$3.8 billion	£100 million
No. employees in industry	200 000	145 405

Table 1 Comparison of Australia and UK wool industry statistics

Goods market access (tariffs and quotas)

The UK Global Tariff has on some wool products has seen the Common External Tariff either remain, be liberalised, or simplified, on wool commodities. The table in [Appendix 1](#) outlines these changes.

WoolProducers encourages the Australian Government to seek duty free, quota free access for all Australian wool and associated products into the United Kingdom, particularly as for the value of these goods, the applied UK Global Tariff is relatively high for the value of the product to which it is applied. We do acknowledge that existing tariffs for some wool lines are bound at zero in the World Trade Organisation (WTO) and therefore no further action on these tariffs is required.

As Australian wool does not compete with that grown by UK farmers due to differences in micron and end-product use, we believe this is an achievable outcome in the A-UK FTA, particularly given the tariffs currently applied on Australian wool into the European Union. The complementary nature of Australian wool for the wool textile industry in Britain should support this outcome being achieved without detriment to the UK's domestic industry.

Recommendation 1: That the A-UK FTA should bind tariffs for wool and wool tops at zero, and eliminate tariffs for associated products.

⁴ Note: the figure for the Australian flock includes sheep that are in the sheep meat industry.

⁵ AWI, www.wool.com

⁶ Duchy College, 2018, *The value of the sheep industry: North East, South West and North West Regions*, National Farmers' Union, www.nfuonline.com/assets/106083

⁷ British Wool, date unknown, *British wool facts – did you know?*, www.britishwool.org.uk (accessed 2 July 2020)

⁸ Make it British, date unknown, *10 facts you may not know about British wool*, www.makeitbritish.co.uk (accessed 2 July)

Biosecurity

Australian wool is sourced by export markets not only for its high quality, but because of its disease-free status from many livestock diseases that cause significant losses in other countries. These diseases include Foot and Mouth Disease (FMD), which the UK experienced a devastating outbreak of in 2001 and again in 2007.

An outbreak of an emergency animal disease such as FMD would have an enormous impact on the Australian wool industry, with export markets closing imports of wool for a minimum of six to 12 months. ABARES has estimated a large outbreak of FMD alone could cost around AUD\$50 billion over ten years. It is therefore essential that in any free trade agreement, the Australian Government maintains our strong biosecurity regulations.

Australia imports agricultural products from the UK, including dairy, eggs and meat. These products pose risks to our livestock disease freedoms. Other biosecurity incursions that can occur through trade include the entry of exotic pests and weeds.

Biosecurity not only supports market access and international competitiveness, which is underpinned by our favourable pest and disease status but is also central to on-farm productivity, profitability and sustainability, minimising the damaging impacts of invasive species and the associated costs of management. Without a strong biosecurity system, our \$60 billion agriculture industry is at risk.

Therefore, WoolProducers advocates that the Australian Government upholds Australia's existing biosecurity requirements, regulations and legislation and does not compromise on these in any way to achieve an A-UK FTA.

Recommendation 2: That the Australian Government upholds Australia's existing biosecurity standards and regulations, and their enforcement, when negotiating and concluding the A-UK FTA.

Equivalency

Australian farmers care for our livestock while upholding high standards of animal health and welfare. They are also stewards of more than 50 per cent of Australia's landmass⁹, caring for our environment through sustainable practices including the control of invasive species, soil management, water conservation, and land conservation. We have a unique climate, and production environments that range from high altitude alpine regions to arid deserts that each require specific production systems and practices to produce agricultural products to the high standards that we achieve. WoolProducers therefore believes that the A-UK FTA (or any FTA for that matter) should not contain animal welfare, antimicrobial resistance, environment, or sustainability provisions as this ignores the differences in production systems between Australia and the United Kingdom.

However, the Australia-European Union FTA will set a precedent for future FTA's for Australia and it is our understanding that animal welfare, antimicrobial resistance, environment, and sustainability provisions will be included in this agreement. As such, we are proactive in our approach to advocate that no requirement to adopt regulations of our trading partners is enforced upon Australian agriculture through FTAs. Australia and the UK should recognise in a non-binding manner the high standards each country holds across these provisions.

⁹ ABARES, 2020, *Snapshot of Australian Agriculture 2020*, www.agriculture.gov.au/abares (accessed 3 June 2020)

Recommendation 3: That the Australian and United Kingdom Governments recognise the high standards upheld by both parties across animal welfare, antimicrobial resistance, environment and sustainability.

Animal welfare

Animal welfare is regulated and enforced in Australia through state and territory laws. Our animal welfare regulation and policy standards are progressive; an example of this is evidenced by the federal Australian Animal Welfare Standards and Guidelines which have been developed for livestock species through an evidence-based approach incorporating relevant scientific literature, current practice, and community expectations¹⁰. Additional examples of animal welfare leadership include the mandating of pain relief for mulesing of sheep in the state of Victoria, which came into force on 1 July, 2020 under the Prevention of Cruelty to Animals (POCTA) Regulations 2019; and the recognition of animals as sentient beings by the Australian Capital Territory under the *Animal Welfare Legislation Bill 2019*.

President of the UK's National Farmers' Union (NFU), Minette Batters, called on the British Government in her opening address at their annual conference in February 2020 to *'show global leadership on international trade and insist that British farm standards are the benchmark for any food imports in future trade deals'*, and *'... highlighted the gulf between the high animal welfare and environmental standards British farmers adhere to and the lack of equivalent regulation around the world'*¹¹.

These statements are simply untrue. It is well known that Australian sheep are raised in extensive production systems that result in more freedoms being experienced by the animals than if they are raised in the UK's more intensive systems. Our extensive production systems result not only in better animal welfare outcomes for our sheep, but also improved outcomes on issues such as antimicrobial resistance. It is for this reason that WoolProducers does not support any requirement for adoption of the same animal welfare standards between Australia and the UK.

As stated in WoolProducers' submission to DFAT on the A-EU FTA, we acknowledge the importance of information exchange and cooperation on matters of mutual benefit to Australia and other countries. We believe that forums such as the World Organisation for Animal Health (OIE), direct inter-government relationships and industry exchanges between Australia and the UK provide opportunities for communication, information exchange and collaboration on matters of animal welfare and we would support the inclusion of text in the A-UK FTA that acknowledges these forums for facilitating information exchange, but exchange and collaboration should not be obligated.

Recommendation 4: That the A-UK FTA does not include animal welfare provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to animal welfare.

Antimicrobial resistance

Usage rates of antimicrobials in Australia is one of the lowest in the world, particularly in agriculture, and this is a result of our responsible use to prevent Antimicrobial Resistance (AMR). WoolProducers recognises global efforts being undertaken in the area of antimicrobial resistance, including surveillance and control activities.

¹⁰ *Australian Animal Welfare Standards and Guidelines*, 2020, www.animalwelfarestandards.net.au (accessed 1 July 2020)

¹¹ National Farmers' Union, 2020, *NFU20: British farm standards must be the benchmark in future trade deals*, www.nfuonline.com/news/euexit

The Australian Government leads *Australia's National Antimicrobial Resistance Strategy – 2020 and Beyond* to minimise development and spread of AMR, and to ensure the continued availability of effective antimicrobials¹². The Australian Pesticides and Veterinary Medicines Authority is an independent statutory body that evaluates and registers antimicrobials for livestock use in Australia, which includes an assessment of the risk of antimicrobial resistance developing.

Australia has good control over the supply of antimicrobials as this class requires veterinary prescription to be obtained by non-veterinarians. Each state/territory Veterinary Surgeons' Board controls the practice of veterinary science in line with jurisdictional laws, which include how antimicrobials can be prescribed and supplied. Further, by law, states/territories are responsible for the control of veterinary medicine use. As such, WoolProducers strongly believes that Australia is already responsibly supplying and using antimicrobials.

To play our part, WoolProducers Australia, on behalf of industry, has also supported the Australian Veterinary Association, Animal Medicines Australia, and Animal Health Australia to undertake a large-scale project to develop best practice antibiotic prescribing guidelines for sheep. These guidelines are being developed in consultation with veterinarians and AMR experts to ensure that they are evidence-based and clinically relevant. By providing veterinarians with guidance on best-practice antimicrobial treatments for sheep, the health and welfare of both meat and wool producing sheep will be optimized, and development of resistance will be avoided.

Ms Batters' speech exemplified Australia as a country that uses '*antibiotics for growth promotion*' in our livestock. For sheep meat production, this claim about antibiotic use is untrue and substantiates the need for the Australian Government to strongly advocate for our high antimicrobial stewardship and usage standards, that our farmers and industry uphold daily. It is also somewhat contradictory given an article in the UK Farmers Weekly¹³ which stated Anglesey sheep farmers have reduced antibiotic use during lambing by almost 60% over a two year period. This reduction was in part due to veterinary and nutritional advice funded by the European Innovation Partnership Wales and included other husbandry procedures such as allowing sufficient feeding space for ewes to contribute to the decline in antibiotic usage.

The Australian wool industry does not intensively house sheep. Because of our extensive grazing systems, we do not require the use of antibiotics at lambing the way that our UK counterparts do. We also do not have space issues around feed bunkers in wool production systems; our sheep are grown on native and improved pastures in rangeland systems. This means we are not challenged by the hygiene and husbandry and other issues associated with housing sheep indoors that UK farmers have to combat.

The National Residue Survey is a federal government system, funded by industry levies, that manages the risk of chemical residues and environmental contaminants in Australian plant and animal products. The system confirms our status as a producer of safe food and facilitates access to export markets by testing for pesticide and veterinary medicine residues, and environmental contaminants. The NRS maintains a database of maximum residue limits (MRLs) established for both Australia and our export markets, and results are checked for compliance with the relevant international MRLs. The results of sheep industry compliance rates for the past six years, relative to Australian standards, demonstrate industry's good practices across pesticide, veterinary medicine, and environmental contaminants (refer to Table 1).

¹² Australian Government, 2017, *National AMR Strategy*, www.amr.gov.au (accessed 1 July 2017)

¹³ Farmers Weekly, 7 May 2020, *How Anglesey farmers have cut antibiotics at lambing by 60%*, www.fwi.co.uk (accessed 19 June 2020)

Years	Samples collected	Compliance rates (%)
2013-14	5,494	99.76
2014-15	2,543	99.68
2015-16	2,539	99.68
2016-17	2,590	99.96
2017-18	2,591	99.69
2018-19	2,589	99.73

Table 2 NRS compliance rates for past six years relative to Australian standards (adapted from NRS 2018-19)

In our submission to DFAT on the A-EU FTA, we acknowledged the importance of information exchange and cooperation on matters of mutual benefit to Australia and other countries including on AMR. We believe that international forums that allow direct inter-government relationships and industry exchanges between Australia and the UK provide opportunities for communication, information exchange and collaboration on matters of AMR and we would support the inclusion of text in the A-UK FTA that acknowledges these forums for facilitating information exchange, but exchange and collaboration should not be obligated.

Recommendation 5: That the A-UK FTA does not include antimicrobial stewardship provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to antimicrobial resistance.

Environment & sustainability

Australian agriculture, and our wool industry, are committed to continual improvement across environmental and sustainability outcomes. This is evidenced by the development of the Sheep Industry Sustainability Framework, which will be launched in late 2020. Other evidence of success includes agriculture's 63 per cent reduction in greenhouse gas emissions intensity between 1996-2016¹⁴. Further examples include the Australian red meat industry's carbon neutral by 2030 initiative, and innovation to preserve our water assets, safeguard our soil and increase biodiversity on Australian farms through pasture management and environmental practices that maintain existing species. We are also seeing renewable energy being embraced with increased solar panel use and the use of farm waste to generate electricity, and growing numbers of wind turbines appearing on properties¹⁵. All these positive environmental outcomes contribute to agriculture's ongoing sustainability in Australia.

Wool is one of the world's most ecologically sustainable fibres. Its benefits include being a carbon sink and reducing fashion's contribution of 10 per cent to annual global carbon emissions¹⁶. Wool is not a synthetic fibre created through the use of plastics; as such, it does not contribute to the issue of plastic waste in both landfill and in the oceans (particularly the microplastics issue in the world's seas). As such, any FTA should favour the use of wool through duty-free, quota free tariffs and abolishment of any non-tariff trade barriers.

¹⁴ National Farmers' Federation, 2019, *2030 Roadmap: Australian agriculture's plan for a \$100 billion industry*, National Farmers' Federation, Barton, pg11

¹⁵ National Australia Bank, 2019, *Hats off to Australian farmers putting sustainable agriculture into practice*, www.business.nab.com.au (accessed 2 July 2020)

¹⁶ The World Bank, 2019, *How much do our wardrobes cost to the environment?*, www.worldbank.org (accessed 2 July 2020)

Sustainability for Australian agriculture is codified in national and state legislative instruments, and through individual state and territory Environmental Protection Agencies. Long-running industry and Commonwealth partnership in the funding of research, development, and extension across areas that bolster sustainability and environmental practices and protections have delivered significant returns on investment, and positive outcomes, for decades.

Australian woolgrowers must adhere to environmental protection, biodiversity and ecological sustainable development through commonwealth and jurisdictional legislation. As previously stated, Ms. Batters' speech at the National Farmers' Union conference in February 2020 referred to the gap in environmental standards adhered to by British farmers and the lack of equivalent regulation in other countries. This is an inaccurate statement when referring to Australia, as evidenced by the examples provided in this submission. It also must be highlighted that UK farmers receive subsidies for environmental stewardship which are not received by Australian farmers.

Recommendation 6: That the A-UK FTA does not include provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to the environment and its protection.

Recommendation 7: That the A-UK FTA does not include provisions that detract from either party's capacity to maintain their regulatory systems and standards in relation to sustainability.

Subsidies

Australian farmers are the second-least subsidised in the world, surpassed only by New Zealand farmers. In contrast, UK farmers currently receive approximately £3.4 billion in subsidies under the EU's Common Agriculture Policy, with money farmers received based primarily on the size of their farm¹⁷.

The UK Agriculture Bill, which is currently being considered by the UK Parliament to replace the EU's Common Agricultural Policy post-Brexit, will provide subsidies to British farmers for environmental protection and improving animal health and welfare, should it become law¹⁸. The Agriculture Bill incorporates changes to farmers being paid not on the size of their farm, but instead to reward for protecting land, air and water; tackling climate change, maintaining the landscape in addition to improving animal health and welfare¹⁷.

The UK National Sheep Association Brexit Policy¹⁹ on 'Rural Funding' states that:

- *“Financial support for UK sheep farmers must, at a minimum, be maintained to reflect the hugely important role farm businesses play in the provision of public goods.*
- *An effective, smooth and suitable length of transition period must be ensured when moving from the current EU scheme to its post-Brexit successor. Funding should be promised for a fixed number of years, regardless of any change of Government in the meantime.*
- *A programme that is strongly focused towards truly active farmers should include:*

¹⁷ Sky News, 17 January 2020, *Farmers to be paid to protect the environment and improve animal welfare*, <https://news.sky.com/story/farmers-to-be-paid-to-protect-the-environment-and-improve-animal-welfare-11909574#:~:text=Currently%2C%20British%20farmers%20get%20around,the%20size%20of%20the%20farm.> (accessed 3 June 2020)

¹⁸ UK Parliament, *Agriculture Bill 2019-21*, <https://services.parliament.uk/bills/2019-21/agriculture.html> (accessed 3 June 2020)

¹⁹ National Sheep Association, 2018, *NSA policy position on Brexit*, www.nationalsheep.org.uk

- *Capital investment support/grant funding to encourage investment in efficiency and agri-environment improvements such as farm buildings, handling systems, fencing, bracken management etc.*
- *An efficiency and productivity scheme including farm health planning, disease screening, post-mortems and involvement in accreditation schemes, and soil and pasture management.*
- *A public goods reward scheme, with an entry level as described above and an optional, deeper level to broaden out the prescriptive nature of existing agri-environment schemes with a more intuitive, outcome-based approach based on the desired outcomes of safe food production from an enhanced environment.*
- *Succession planning and facilitation to enable older farmers to retire and younger farmers to come through. This would include: start-up or low interest loans for new entrants; percentage-based additional payments for young entrants who qualify; relaxation of planning controls to encourage older farmers to retire and stay on the farm; and tax breaks to encourage business succession.*
- *Additional support for farming activity in uplands, hill and marginal areas, continuing to use existing land classification for Less Favoured Areas and Areas of Natural Constraint. These areas are home to 41% of English ewes, 63% of Welsh cattle and sheep holdings, 80% of Northern Irish sheep and 91% of Scottish ewes”.*

The programme asks of the UK National Sheep Association Brexit Policy are all standard requirements for the operation of farm businesses in Australia. As such, and to the point of existing and future subsidies, the Australian Government must be cognisant of the subsidies received by British farmers when negotiating the A-UK FTA and understand that agreement to equivalency across production, environment, sustainability, or animal health and welfare practices cannot occur fairly if British farmers are being subsidised to achieve their own standards.

Recommendation 8: That the Australian Government considers the subsidies received by UK farmers (both current and future) in A-UK FTA negotiations and ensures outcomes in the FTA are fair and equitable for Australian farmers.

Wool payment systems

In Australia, most wool is sold through an open-cry auction system where prices received by woolgrowers are subject to the influences of supply and demand for the type of wool offered. Some wool is sold through other means such as forward and direct contracts or online transaction platforms.

By comparison, the UK farmer-owned ‘British Wool’ handles and sells graded wool on behalf of woolgrowers in a series of auctions held over 12 months. The price paid is the average of that attained over all of the sales during the year, less handling costs, resulting in the same grade wool being paid the same price irrespective of where it is farmed, the clip size, or when wool is received²⁰. The average price is unknown until it is calculated at the end of the selling season, and farmers receive payment on receipt of their clip in the following year.

The payment is made up of an Advance Payment (when the wool is delivered to British Wool) and a second Balance Payment, which is paid on receipt of the following year’s clip.

The *2020 Producer Information and Wool Values*²¹ states that due to COVID-19, British wool has had to place a value on an unsold wool stock of 9 million kilograms (out of a total 2019.20 clip of 27 million

²⁰ British Wool, 2018, *2018 Producer information and wool values*, www.britishwool.org.uk

²¹ British Wool, 2020, *2020 Producer information and wool values*, www.britishwool.org.au

kilograms) to calculate the wool values for 2019/20. The average price paid to producers for the 2019/20 clip is 32p/kg, with some mountain wools achieving 15p/kg and some finer white wools more than 70p/kg. A payment will be made to growers, additional to the 32p/kg average, if the unsold 2019/20 wool stock is sold at a price higher than British Wool's assumed value (this will depend on the economic outlook at the time).

By contrast, in Australia, we have seen the Eastern Market Indicator continually fall since the beginning of COVID-19 and prices are now at a five-year low²². WoolProducers conducted a survey of woolgrowers during the early pandemic response phase which found that our growers have been impacted both financially and non-financially. The financial impact averaged an estimated 32.6 per cent loss to growers, and this data was consistent with that of AWEX²³ who provided WoolProducers with an analysis of wool sale statistics relating to an eight week period commencing 16 March 2020 with the same period of time in 2019. AWEX's comparison found that the value of wool sold during this time period had decreased 33.1 per cent. The market effects culminating from the impacts of COVID-19 have seen high wool storage rates, as well as wool being passed-in or withdrawn from sale at auctions. This has had a significant, detrimental impact on Australian woolgrowers' cashflows, and the resultant stockpiling will lead to a future glut in the market that will continue the price issues being experienced.

Therefore, our woolgrowers are subjected to price volatility in markets that British farmers do not experience through their selling and buying system, which appears to be similar to the former Wool Reserve Price Scheme that existed in Australia until 1991 when the Australian Government ended the scheme. As such, it is important that the Australian Government is aware of the differences in wool selling systems between Australia and the UK, and ensures that outcomes of the negotiations are fair and equitable for Australian wool in the context of payment and any issues that could arise from this.

Recommendation 9: That the Australian Government recognises the differences in payment systems for Australian and UK wool, and ensures that Australian farmers are not disadvantaged because of these in outcomes of the A-UK FTA.

Agricultural labour

The UK National Sheep Association policy on Brexit¹⁹ identifies there will be a need in the UK for migrant labour from other countries including for seasonal shearing work. Australia already experiences a lack of shearers and associated workers, such as wool handlers, in the wool industry and we rely on migrant labour to fill this void, mainly from New Zealand.

WoolProducers Australia therefore supports an A-UK FTA that provides for agricultural labour exchange between our countries so as to facilitate greater access to skilled-labour for wool harvesting.

Recommendation 10: That the Australian Government seeks provisions in the A-UK FTA that allows skilled labour exchange between Australia and the UK for wool harvesting.

²² As at 1 July 2020

²³ AWEX is the company responsible for:

- Monitoring and administering trading rules in Australia,
- Managing wool industry self-regulation through the provision of a framework of business rules governing the trade of wool between buyer and seller members of AWEX,
- Maintaining recognised standards and codes of practice, and
- Value adding by providing pre- and post-sale market information.

Conclusion

WoolProducers Australia is supportive of an A-UK FTA that benefits Australian agriculture through increased demand for our products. WoolProducers seeks a free trade agreement that has duty-free, quota-free access for Australian wool exports to the UK, and that does not allow for UK regulation to be imposed through the agreement on Australian farmers.

We advocate the importance of the Australian Government ensuring that outcomes of the A-UK FTA are fair and equitable for Australian woolgrowers, particularly given the differences that exist across existing and future subsidies (those that are expected to eventuate from the UK Agriculture Bill) and also should any outcomes be effected by the different marketing and payment systems that exist for Australian and British wool.

WoolProducers seeks provisions in the A-UK FTA that allow skilled labour exchange between the UK and Australia for wool harvesting. This is particularly beneficial given the shortage of shearers experienced in Australia, and so this outcome would provide an additional opportunity to overcome this challenge.

Appendix 1: Change in commodity tariffs under UK Global Tariff

Commodity	Description	Common External Tariff	UK Global Tariff	Change
15050010	Crude wool grease	3.2%	0.0%	Liberalised
15050090	Wool grease and fatty substances derived therefrom, incl. lanolin (excl. crude wool grease)	0.0%	0.0%	No change
51011100	Greasy shorn wool, incl. fleece-washed wool, neither carded nor combed	0.0%	0.0%	No change
51011900	Greasy wool, incl. fleece-washed wool, neither carded nor combed (excl. shorn wool)	0.0%	0.0%	No change
51012100	Shorn wool, degreased, non-carbonised, neither carded nor combed	0.0%	0.0%	No change
51012900	Degreased wool, non-carbonised, neither carded nor combed (excl. shorn wool)	0.0%	0.0%	No change
51013000	Carbonised wool, neither carded nor combed	0.0%	0.0%	No change
51022000	Coarse animal hair, neither carded nor combed (excl. wool, hair and bristles used in the manufacture of brooms and brushes, and horsehair from the mane or tail)	0.0%	0.0%	No change
51031010	Noils of wool or of fine animal hair, non-carbonised (excl. garnetted stock)	0.0%	0.0%	No change
51031090	Noils of wool or of fine animal hair, carbonised (excl. garnetted stock)	0.0%	0.0%	No change
51032000	Waste of wool or of fine animal hair, incl. yarn waste (excl. noils and garnetted stock)	0.0%	0.0%	No change
51040000	Garnetted stock of wool or of fine or coarse animal hair, neither carded nor combed	0.0%	0.0%	No change
51051000	Wool, carded	2.0%	0.0%	Liberalised
51052100	Wool, combed, in fragments "open tops"	2.0%	0.0%	Liberalised
51052900	Wool, combed (excl. that in fragments "open tops")	2.0%	0.0%	Liberalised
51053900	Fine animal hair, carded or combed (excl. wool and hair of Kashmir "cashmere" goats)	2.0%	0.0%	Liberalised

51061010	Carded wool yarn containing $\geq 85\%$ wool by weight, unbleached (excl. that put up for retail sale)	3.8%	2.0%	Simplified
51061090	Carded wool yarn containing $\geq 85\%$ wool by weight (excl. unbleached and that put up for retail sale)	3.8%	2.0%	Simplified
51062010	Carded wool yarn containing predominantly, but $< 85\%$ wool by weight, with a wool and fine animal hair content of $\geq 85\%$ (excl. put up for retail sale)	3.8%	2.0%	Simplified
51062091	Carded wool yarn containing predominantly, but $< 85\%$ wool by weight, unbleached (excl. that with a wool and fine animal hair content of $\geq 85\%$ and that put up for retail sale)	4.0%	4.0%	No change
51062099	Carded wool yarn containing predominantly, but $< 85\%$ wool by weight (excl. unbleached yarn, yarn with a wool and fine animal hair content of $\geq 85\%$ and yarn put up for retail sale)	4.0%	4.0%	No change
51071010	Yarn of combed wool containing $\geq 85\%$ wool by weight, unbleached (excl. that put up for retail sale)	3.8%	2.0%	Simplified
51071090	Yarn of combed wool containing $\geq 85\%$ wool by weight (excl. unbleached and that put up for retail sale)	3.8%	2.0%	Simplified
51072010	Yarn of combed wool containing predominantly, but $< 85\%$ wool by weight, with a wool and fine animal hair content of $\geq 85\%$, unbleached (excl. that put up for retail sale)	4.0%	4.0%	No change
51072030	Yarn of combed wool containing predominantly, but $< 85\%$ wool by weight, with a wool and fine animal hair content of $\geq 85\%$ (excl. unbleached and that put up for retail sale)	4.0%	4.0%	No change
51072051	Yarn of combed wool containing predominantly, but $< 85\%$ wool by weight, mixed principally or solely with synthetic staple fibres, unbleached (excl. that put up for retail sale)	4.0%	4.0%	No change

51072059	Yarn of combed wool containing predominantly, but < 85% wool by weight, mixed principally or solely with synthetic staple fibres (excl. unbleached and that put up for retail sale)	4.0%	4.0%	No change
51072091	Yarn of combed wool containing predominantly, but < 85% wool by weight, unbleached (excl. yarn mixed principally or solely with synthetic staple fibres, yarn with a wool and fine animal hair content of $\geq 85\%$, and yarn put up for retail sale)	4.0%	4.0%	No change
51072099	Yarn of combed wool containing predominantly, but < 85% wool by weight (excl. unbleached yarn, yarn mixed principally or solely with synthetic staple fibres, yarn with a wool and fine animal hair content of $\geq 85\%$, and yarn put up for retail sale)	4.0%	4.0%	No change
51081010	Carded yarn of fine animal hair, unbleached (excl. that of wool or that put up for retail sale)	3.2%	2.0%	Simplified
51081090	Carded yarn of fine animal hair (excl. unbleached yarn, yarn of wool and yarn put up for retail sale)	3.2%	2.0%	Simplified
51082010	Combed yarn of fine animal hair, unbleached (excl. that of wool and that put up for retail sale)	3.2%	2.0%	Simplified
51082090	Combed yarn of fine animal hair (excl. unbleached yarn, yarn of wool and yarn put up for retail sale)	3.2%	2.0%	Simplified
51091010	Yarn containing $\geq 85\%$ wool or fine animal hair by weight, put up for retail sale in balls, hanks or skeins, weighing > 125 g but ≤ 500 g	3.8%	2.0%	Simplified
51091090	Yarn containing $\geq 85\%$ wool or fine animal hair by weight, put up for retail sale (excl. that in balls, hanks or skeins and weighing > 125 g but ≤ 500 g)	5.0%	4.0%	Simplified
51099000	Yarn containing predominantly, but < 85% wool or fine animal hair by weight, put up for retail sale	5.0%	4.0%	Simplified
51111100	Woven fabrics containing $\geq 85\%$ carded wool or carded fine animal hair by weight and weighing ≤ 300 g/m ²	8.0%	8.0%	No change

51111900	Woven fabrics containing $\geq 85\%$ carded wool or carded fine animal hair by weight and weighing $> 300 \text{ g/m}^2$ (excl. fabrics for technical uses specified in heading 5911)	8.0%	8.0%	No change
51112000	Woven fabrics containing predominantly, but $< 85\%$ carded wool or carded fine animal hair by weight, mixed principally or solely with synthetic or artificial filaments	8.0%	8.0%	No change
51113010	Woven fabrics containing predominantly, but $< 85\%$ carded wool or carded fine animal hair by weight, mixed principally or solely with synthetic or artificial staple fibres and weighing $\leq 300 \text{ g/m}^2$	8.0%	8.0%	No change
51113080	Woven fabrics containing predominantly, but $< 85\%$ carded wool or carded fine animal hair by weight, mixed principally or solely with synthetic or artificial staple fibres and weighing $> 300 \text{ g/m}^2$	8.0%	8.0%	No change
51119010	Woven fabrics containing predominantly, but $< 85\%$ carded wool or carded fine animal hair and $> 10\%$ silk, silk waste by weight (excl. those mixed principally or solely with synthetic or artificial filaments or staple fibres)	7.2%	6.0%	Simplified
51119091	Woven fabrics containing predominantly, but $< 85\%$ carded wool or carded fine animal hair by weight and weighing $\leq 300 \text{ g/m}^2$ (excl. those mixed principally or solely with synthetic or artificial filaments or staple fibres and those containing $> 10\%$ silk, silk waste by weight)	8.0%	8.0%	No change
51119098	Woven fabrics containing predominantly, but $< 85\%$ carded wool or carded fine animal hair by weight and weighing $> 300 \text{ g/m}^2$ (excl. those mixed principally or solely with synthetic or artificial filaments or staple fibres and fabrics containing $> 10\%$ silk, silk waste by weight)	8.0%	8.0%	No change

51121100	Woven fabrics containing \geq 85% combed wool or combed fine animal hair by weight and weighing \leq 200 g/m ² (excl. fabrics for technical uses of heading 5911)	8.0%	8.0%	No change
51121900	Woven fabrics containing \geq 85% combed wool or combed fine animal hair by weight and weighing $>$ 200 g/m ²	8.0%	8.0%	No change
51122000	Woven fabrics containing predominantly, but $<$ 85% combed wool or combed fine animal hair by weight, mixed principally or solely with synthetic or artificial filaments (excl. fabrics for technical uses of heading 5911)	8.0%	8.0%	No change
51123010	Woven fabrics containing predominantly, but $<$ 85% combed wool or combed fine animal hair by weight, mixed principally or solely with synthetic or artificial staple fibres and weighing \leq 200 g/m ² (excl. fabrics for technical uses of heading 5911)	8.0%	8.0%	No change
51123080	Woven fabrics containing predominantly, but $<$ 85% combed wool or combed fine animal hair by weight, mixed principally or solely with synthetic or artificial staple fibres and weighing $>$ 200 g/m ² (excl. fabrics for technical uses of heading 5911)	8.0%	8.0%	No change
51129010	Woven fabrics containing predominantly, but $<$ 85% combed wool or combed fine animal hair by weight and $>$ 10% silk, silk waste by weight (excl. those mixed principally or solely with synthetic or artificial filaments or staple fibres and fabrics for technical uses of heading 5911)	7.2%	6.0%	Simplified
51129091	Woven fabrics containing predominantly, but $<$ 85% combed wool or combed fine animal hair by weight and weighing \leq 200 g/m ² (excl. those mixed principally or solely with synthetic or artificial filaments or staple fibres, those containing $>$ 10% silk, silk waste by weight and fabrics for technical uses of heading 5911)	8.0%	8.0%	No change

51129098	Woven fabrics containing predominantly, but < 85% combed wool or combed fine animal hair by weight and weighing > 200 g/m ² (excl. those mixed principally or solely with synthetic or artificial filaments or staple fibres, those containing > 10% silk, silk waste by weight and fabrics for technical uses of heading 5911)	8.0%	8.0%	No change
55095200	Yarn containing > 50% to < 85% polyester staple fibres by weight, mixed principally or solely with wool or fine animal hair (excl. sewing thread and yarn put up for retail sale)	4.0%	4.0%	No change
55095900	Yarn containing predominantly, but < 85% polyester staple fibres by weight, other than that mixed principally or solely with cotton, wool, fine animal hair or artificial staple fibres (excl. sewing thread and yarn put up for retail sale)	4.0%	4.0%	No change
55096100	Yarn containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, mixed principally or solely with wool or fine animal hair (excl. sewing thread and yarn put up for retail sale)	4.0%	4.0%	No change
55096900	Yarn containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, other than that mixed principally or solely with cotton, wool or fine animal hair (excl. sewing thread and yarn put up for retail sale)	4.0%	4.0%	No change
55099100	Yarn containing predominantly, but < 85% synthetic staple fibres by weight, mixed principally or solely with wool or fine animal hair (excl. sewing thread, yarn put up for retail sale and yarn of polyester, acrylic or modacrylic staple fibres)	4.0%	4.0%	No change

55099900	Yarn containing predominantly, but < 85% synthetic staple fibres by weight, other than that mixed principally or solely with cotton, wool or fine animal hair (excl. sewing thread, yarn put up for retail sale and yarn of polyester, acrylic or modacrylic staple fibres)	4.0%	4.0%	No change
55102000	Yarn containing predominantly, but < 85% artificial staple fibres by weight, mixed principally or solely with wool or fine animal hair (excl. sewing thread and yarn put up for retail sale)	4.0%	0.0%	Liberalised
55109000	Yarn containing predominantly, but < 85% artificial staple fibres by weight, other than that mixed principally or solely with cotton, wool or fine animal hair (excl. sewing thread and yarn put up for retail sale)	4.0%	0.0%	Liberalised
55151311	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, mixed principally or solely with carded wool or carded fine animal hair, unbleached or bleached	8.0%	8.0%	No change
55151319	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, mixed principally or solely with carded wool or carded fine animal hair, dyed, made of yarn of different colours, or printed	8.0%	8.0%	No change
55151391	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, mixed principally or solely with combed wool or combed fine animal hair, unbleached or bleached	8.0%	8.0%	No change
55151399	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, mixed principally or solely with combed wool or combed fine animal hair, dyed, made of yarn of different colours, or printed	8.0%	8.0%	No change

55151910	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, other than those mixed principally or solely with wool or fine animal hair, man-made filament, viscose staple fibres or cotton, unbleached or bleached	8.0%	8.0%	No change
55151930	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, other than those mixed principally or solely with wool or fine animal hair, man-made filament, viscose staple fibres or cotton, printed	8.0%	8.0%	No change
55151990	Woven fabrics containing predominantly, but < 85% polyester staple fibres by weight, other than those mixed principally or solely with wool or fine animal hair, man-made filament, viscose staple fibres or cotton, dyed or made of yarn of different colours	8.0%	8.0%	No change
55152211	Woven fabrics containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, mixed principally or solely with carded wool or carded fine animal hair, unbleached or bleached	8.0%	8.0%	No change
55152219	Woven fabrics containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, mixed principally or solely with carded wool or carded fine animal hair, dyed, made of yarn of different colours, or printed	8.0%	8.0%	No change
55152291	Woven fabrics containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, mixed principally or solely with combed wool or combed fine animal hair, unbleached or bleached	8.0%	8.0%	No change

55152299	Woven fabrics containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, mixed principally or solely with combed wool or combed fine animal hair, dyed, made of yarn of different colours, or printed	8.0%	8.0%	No change
55152900	Woven fabrics containing predominantly, but < 85% acrylic or modacrylic staple fibres by weight, other than those mixed principally or solely with wool, fine animal hair, man-made filaments or cotton	8.0%	8.0%	No change
55163100	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, mixed principally or solely with wool or fine animal hair, unbleached or bleached	8.0%	8.0%	No change
55163200	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, mixed principally or solely with wool or fine animal hair, dyed	8.0%	8.0%	No change
55163300	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, mixed principally or solely with wool or fine animal hair, made of yarn of different colours	8.0%	8.0%	No change
55163400	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, mixed principally or solely with wool or fine animal hair, printed	8.0%	8.0%	No change
55169100	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, other than those mixed principally or solely with cotton, wool, fine animal hair or man-made filament, unbleached or bleached	8.0%	8.0%	No change

55169200	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, other than those mixed principally or solely with cotton, wool, fine animal hair or man-made filament, dyed	8.0%	8.0%	No change
55169300	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, other than those mixed principally or solely with cotton, wool, fine animal hair or man-made filament, made of yarn of different colours	8.0%	8.0%	No change
55169400	Woven fabrics containing predominantly, but < 85% artificial staple fibres by weight, other than those mixed principally or solely with cotton, wool, fine animal hair or man-made filament, printed	8.0%	8.0%	No change
56021031	Felt in the form of stitch-bonded fibre fabrics, not impregnated, coated, covered or laminated, of wool or fine animal hair, n.e.s.	6.7%	6.0%	Simplified
56021038	Felt in the form of stitch-bonded fibre fabrics, not impregnated, coated, covered or laminated, n.e.s. (excl. that of wool or of fine animal hair)	6.7%	6.0%	Simplified
56022100	Felt, not impregnated, coated, covered or laminated, of wool or fine animal hair, n.e.s. (excl. needleloom felt and stitch-bonded fibre fabrics)	6.7%	6.0%	Simplified
56022900	Felt, not impregnated, coated, covered or laminated (excl. that of wool or fine animal hair; needleloom felt and stitch-bonded fibre fabrics)	6.7%	6.0%	Simplified
57011010	Carpets and other textile floor coverings, of wool or fine animal hair, knotted, whether or not made up, containing > 10% silk or waste silk other than noil by weight	8.0%	0.0%	Liberalised
57011090	Carpets and other textile floor coverings, of wool or fine animal hair, knotted, whether or not made up (excl. those containing > 10% silk or waste silk other than noil by weight)	8.00% MAX 2.80 EUR / m2	0.0%	Liberalised

57019090	Carpets and other textile floor coverings, of textile materials, knotted, whether or not made up (excl. those of wool or fine animal hair, of silk or waste silk other than noil, or of textile materials containing metal yarn)	3.5%	0.0%	Liberalised
57023110	Axminster carpets of wool or fine animal hair, woven, not tufted or flocked, of pile construction, not made up	8.0%	8.0%	No change
57023180	Carpets and other floor coverings, of wool or fine animal hair, woven, not tufted or flocked, of pile construction, not made up (excl. Axminster, Kelem, Schumacks, Karamanie and similar hand-woven rugs)	8.0%	8.0%	No change
57024110	Axminster carpets of wool or fine animal hair, woven, not tufted or flocked, of pile construction, made up	8.0%	8.0%	No change
57024190	Carpets and other floor coverings, of wool or fine animal hair, woven, not tufted or flocked, of pile construction, made up (excl. Kelem, Schumacks, Karamanie and similar hand-woven rugs, and Axminster carpets)	8.0%	8.0%	No change
57025010	Carpets and other floor coverings, of wool or fine animal hair, woven, not tufted or flocked, not of pile construction, not made up (excl. Kelem, Schumacks, Karamanie and similar hand-woven rugs)	8.0%	8.0%	No change
57029100	Carpets and other floor coverings, of wool or fine animal hair, woven, not tufted or flocked, not of pile construction, made up (excl. Kelem, Schumacks, Karamanie and similar hand-woven rugs)	8.0%	8.0%	No change
57031000	Carpets and other floor coverings, of wool or fine animal hair, tufted "needle punched", whether or not made up	8.0%	8.0%	No change

57050080	Carpets and other textile floor coverings, of wool or animal hair or vegetable materials, whether or not made up (excl. knotted, tufted "needle punched", and woven or of felt but non-flocked)	8.0%	8.0%	No change
58011000	Woven pile fabrics and chenille fabrics, of wool or fine animal hair (excl. terry towelling and similar woven terry fabrics, tufted textile fabrics and narrow woven fabrics of heading 5806)	8.0%	8.0%	No change
61021010	Women's or girls' overcoats, car coats, capes, cloaks and similar articles of wool or fine animal hair, knitted or crocheted	12.0%	12.0%	No change
61021090	Women's or girls' anoraks, incl. ski jackets, windcheaters, wind-jackets and similar articles, of wool or fine animal hair, knitted or crocheted (excl. suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers, bib and brace overalls)	12.0%	12.0%	No change
61029010	Women's or girls' overcoats, car coats, capes, cloaks and similar articles, of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton and man-made fibres)	12.0%	12.0%	No change
61029090	Women's or girls' anoraks, incl. ski jackets, windcheaters, wind-jackets and similar articles, of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton and man-made fibres, suits, ensembles, jackets, blazers, dresses, skirts, divided skirts, trousers, bib and brace overalls)	12.0%	12.0%	No change
61031010	Men's or boys' suits of textile materials, knitted or crocheted, of wool or fine animal hair (excl. tracksuits, ski suits and swimwear)	12.0%	12.0%	No change
61031090	Men's or boys' suits of textile materials, knitted or crocheted (excl. of wool or fine animal hair, tracksuits, ski suits and swimwear)	12.0%	12.0%	No change

61032900	Men's or boys' ensembles of textile materials (excl. wool, fine animal hair, cotton or synthetic fibres, ski ensembles and swimwear)	12.0%	12.0%	No change
61033100	Men's or boys' jackets and blazers of wool or fine animal hair, knitted or crocheted (excl. wind-jackets and similar articles)	12.0%	12.0%	No change
61033900	Men's or boys' jackets and blazers of textile materials (excl. of wool, fine animal hair, cotton or synthetic fibres, wind-jackets and similar articles)	12.0%	12.0%	No change
61034100	Men's or boys' trousers, bib and brace overalls, breeches and shorts of wool or fine animal hair, knitted or crocheted (excl. swimwear and underpants)	12.0%	12.0%	No change
61034900	Men's or boys' trousers, bib and brace overalls, breeches and shorts of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, swimwear and underpants)	12.0%	12.0%	No change
61042910	Women's or girls' ensembles of textile materials (excl. of cotton or synthetic fibres, ski ensembles and swimwear) Of wool or fine animal hair	12.0%	12.0%	No change
61043100	Women's or girls' jackets and blazers of wool or fine animal hair, knitted or crocheted (excl. wind-jackets and similar articles)	12.0%	12.0%	No change
61043900	Women's or girls' jackets and blazers of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, wind-jackets and similar articles)	12.0%	12.0%	No change
61044100	Women's or girls' dresses of wool or fine animal hair, knitted or crocheted (excl. petticoats)	12.0%	12.0%	No change
61044900	Women's or girls' dresses of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton, man-made fibres and petticoats)	12.0%	12.0%	No change
61045100	Women's or girls' skirts and divided skirts of wool or fine animal hair, knitted or crocheted (excl. petticoats)	12.0%	12.0%	No change

61045900	Women's or girls' skirts and divided skirts of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, and petticoats)	12.0%	12.0%	No change
61046100	Women's or girls' trousers, bib and brace overalls, breeches and shorts of wool or fine animal hair, knitted or crocheted (excl. panties and swimwear)	12.0%	12.0%	No change
61046900	Women's or girls' trousers, bib and brace overalls, breeches and shorts of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, panties and swimwear)	12.0%	12.0%	No change
61059010	Men's or boys' shirts of wool or fine animal hair, knitted or crocheted (excl. nightshirts, T-shirts, singlets and other vests)	12.0%	12.0%	No change
61059090	Men's or boys' shirts of textile materials, knitted or crocheted (excl. of cotton, man-made fibres, wool or fine animal hair, nightshirts, T-shirts, singlets and other vests)	12.0%	12.0%	No change
61069010	Women's or girls' blouses, shirts and shirt-blouses of wool or fine animal hair, knitted or crocheted (excl. T-shirts and vests)	12.0%	12.0%	No change
61069090	Women's or girls' blouses, shirts and shirt-blouses of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or man-made fibres, silk or silk waste, flax or ramie, T-shirts and vests)	12.0%	12.0%	No change
61099020	T-shirts, singlets and other vests of wool or fine animal hair or man-made fibres, knitted or crocheted	12.0%	12.0%	No change
61101110	Jerseys and pullovers containing $\geq 50\%$ by weight of wool and weighing ≥ 600 g/article, knitted or crocheted	10.5%	10.0%	Simplified

61101130	Men's or boys' jerseys, pullovers, cardigans, waistcoats and similar articles, of wool, knitted or crocheted (excl. jerseys and pullovers containing \geq 50% by weight of wool and weighing \geq 600 g/article, and wadded waistcoats)	12.0%	12.0%	No change
61101190	Women's or girls' jerseys, pullovers, cardigans, waistcoats and similar articles, of wool, knitted or crocheted (excl. jerseys and pullovers containing \geq 50% by weight of wool and weighing \geq 600 g/article, and wadded waistcoats)	12.0%	12.0%	No change
61109090	Jerseys, pullovers, cardigans, waistcoats and similar articles, of textile materials, knitted or crocheted (excl. of man-made fibres, wool, fine animal hair, cotton, flax or ramie, and wadded waistcoats)	12.0%	12.0%	No change
61119011	Babies' gloves, mittens and mitts, of wool or fine animal hair, knitted or crocheted	8.9%	8.0%	Simplified
61119019	Babies' garments and clothing accessories, of wool or fine animal hair, knitted or crocheted (excl. gloves, mittens, mitts and hats)	12.0%	12.0%	No change
61119090	Babies' garments and clothing accessories of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, and hats)	12.0%	12.0%	No change
61159400	Full-length or knee-length stockings, socks and other hosiery, incl. footwear without applied soles, of wool or fine animal hair, knitted or crocheted (excl. graduated compression hosiery, pantyhose and tights, women's full-length or knee-length stockings, measuring per single yarn $<$ 67 decitex, and hosiery for babies)	12.0%	12.0%	No change

61159900	Full-length or knee-length stockings, socks and other hosiery, incl. footwear without applied soles, of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, graduated compression hosiery, pantyhose and tights, women's full-length or knee-length stockings, measuring per single yarn < 67 decitex, and hosiery for babies)	12.0%	12.0%	No change
61169100	Gloves, mittens and mitts, of wool or fine animal hair, knitted or crocheted (excl. for babies)	8.9%	8.0%	Simplified
61169900	Gloves, mittens and mitts, of textile materials, knitted or crocheted (excl. of wool, fine animal hair, cotton or synthetic fibres, impregnated, coated or covered with plastics or rubber, and for babies)	8.9%	8.0%	Simplified
62011100	Men's or boys' overcoats, raincoats, car coats, capes, cloaks and similar articles, of wool or fine animal hair (excl. knitted or crocheted)	12.0%	12.0%	No change
62011900	Men's or boys' overcoats, raincoats, car coats, capes, cloaks and similar articles, of textile materials (excl. of wool or fine animal hair, cotton or man-made fibres, knitted or crocheted)	12.0%	12.0%	No change
62019100	Men's or boys' anoraks, incl. ski jackets, windcheaters, wind-jackets and similar articles, of wool or fine animal hair (excl. knitted or crocheted, suits, ensembles, jackets, blazers and trousers)	12.0%	12.0%	No change
62019900	Men's or boys' anoraks, incl. ski jackets, windcheaters, wind-jackets and similar articles of textile materials (excl. of wool, fine animal hair, cotton or man-made fibres, knitted or crocheted, suits, ensembles, jackets, blazers and trousers)	12.0%	12.0%	No change
62021100	Women's or girls' overcoats, raincoats, car coats, capes, cloaks and similar articles, of wool or fine animal hair (excl. knitted or crocheted)	12.0%	12.0%	No change

62021900	Women's or girls' overcoats, raincoats, car coats, capes, cloaks and similar articles, of textile materials (excl. of wool or fine animal hair, cotton or man-made fibres, knitted or crocheted)	12.0%	12.0%	No change
62029100	Women's or girls' anoraks, incl. ski jackets, windcheaters, wind-jackets and similar articles, of wool or fine animal hair (excl. knitted or crocheted, suits, ensembles, jackets, blazers and trousers)	12.0%	12.0%	No change
62029900	Women's or girls' anoraks, incl. ski jackets, windcheaters, wind-jackets and similar articles, of textile materials (excl. of wool, fine animal hair, cotton or man-made fibres, knitted or crocheted, suits, ensembles, jackets, blazers and trousers)	12.0%	12.0%	No change
62031100	Men's or boys' suits of wool or fine animal hair (excl. knitted or crocheted, tracksuits, ski suits and swimwear)	12.0%	12.0%	No change
62031990	Men's or boys' suits of textile materials (excl. of wool or fine animal hair, cotton or synthetic fibres, knitted or crocheted, tracksuits, ski suits and swimwear)	12.0%	12.0%	No change
62032930	Men's or boys' ensembles of wool or fine animal hair (excl. knitted or crocheted, ski ensembles and swimwear)	12.0%	12.0%	No change
62032990	Men's or boys' ensembles of textile materials (excl. of wool, fine animal hair, cotton, man-made fibres, knitted or crocheted, ski ensembles and swimwear)	12.0%	12.0%	No change
62033100	Men's or boys' jackets and blazers of wool or fine animal hair (excl. knitted or crocheted, and wind-jackets and similar articles)	12.0%	12.0%	No change
62033990	Men's or boys' jackets and blazers of textile materials (excl. of wool, fine animal hair, cotton or man-made fibres, knitted or crocheted, and wind-jackets and similar articles)	12.0%	12.0%	No change

62034110	Men's or boys' trousers and breeches of wool or fine animal hair (excl. knitted or crocheted, bib and brace overalls and underpants)	12.0%	12.0%	No change
62034130	Men's or boys' bib and brace overalls of wool or fine animal hair (excl. knitted or crocheted)	12.0%	12.0%	No change
62034190	Men's or boys' shorts of wool or fine animal hair (excl. knitted or crocheted, underpants and swimwear)	12.0%	12.0%	No change
62034990	Men's or boys' trousers, bib and brace overalls, breeches and shorts of textile materials (excl. of wool, fine animal hair, cotton or man-made fibres, knitted or crocheted, underpants and swimwear)	12.0%	12.0%	No change
62041100	Women's or girls' suits of wool or fine animal hair (excl. knitted or crocheted, ski overalls and swimwear)	12.0%	12.0%	No change
62042100	Women's or girls' ensembles of wool or fine animal hair (excl. knitted or crocheted, ski overalls and swimwear)	12.0%	12.0%	No change
62043100	Women's or girls' jackets and blazers of wool or fine animal hair (excl. knitted or crocheted, wind-jackets and similar articles)	12.0%	12.0%	No change
62044100	Women's or girls' dresses of wool or fine animal hair (excl. knitted or crocheted and petticoats)	12.0%	12.0%	No change
62045100	Women's or girls' skirts and divided skirts of wool or fine animal hair (excl. knitted or crocheted and petticoats)	12.0%	12.0%	No change
62046110	Women's or girls' trousers and breeches of wool or fine animal hair (excl. knitted or crocheted, panties and swimwear)	12.0%	12.0%	No change
62046185	Women's or girls' bib and brace overalls and shorts, of wool or fine animal hair (excl. knitted or crocheted, panties and swimwear)	12.0%	12.0%	No change
62062000	Women's or girls' blouses, shirts and shirt-blouses of wool or fine animal hair (excl. knitted or crocheted and vests)	12.0%	12.0%	No change

62099010	Babies' garments and clothing accessories of wool or fine animal hair (excl. knitted or crocheted and hats)	10.5%	10.0%	Simplified
62142000	Shawls, scarves, mufflers, mantillas, veils and similar articles of wool or fine animal hair (excl. knitted or crocheted)	8.0%	8.0%	No change
63012010	Blankets and travelling rugs of wool or fine animal hair, knitted or crocheted (excl. electric, table covers, bedspreads and articles of bedding and similar furnishing of heading 9404)	12.0%	12.0%	No change
63012090	Blankets and travelling rugs, of wool or fine animal hair (excl. knitted or crocheted, electric, table covers, bedspreads and articles of bedding and similar furnishing of heading 9404)	12.0%	12.0%	No change
65050010	Hats and other headgear, knitted or crocheted, or made up from lace, of fur felt or of felt of wool and fur, made from the hat bodies, hoods or plateaux of heading 6501, whether or not lined or trimmed (excl. made by assembling strips or pieces of felt, and toy and carnival headgear)	5.7%	4.0%	Simplified
65069910	Hats and other headgear, of fur felt or of felt of wool and fur, made from the hat bodies, hoods or plateaux of heading 6501, whether or not lined or trimmed (excl. knitted or crocheted or made up from lace, made by assembling strips or pieces of felt, and toy and carnival headgear)	5.7%	4.0%	Simplified
67030000	Human hair, dressed, thinned, bleached or otherwise worked; wool, other animal hair or other textile materials, prepared for use in making wigs or the like (excl. natural plaits of human hair, whether or not washed and degreased, but not otherwise processed)	1.7%	0.0%	Liberalised

