



Australia-India Comprehensive Economic Co-operation Agreement (CECA)

15 June 2026

Submission Prepared By:

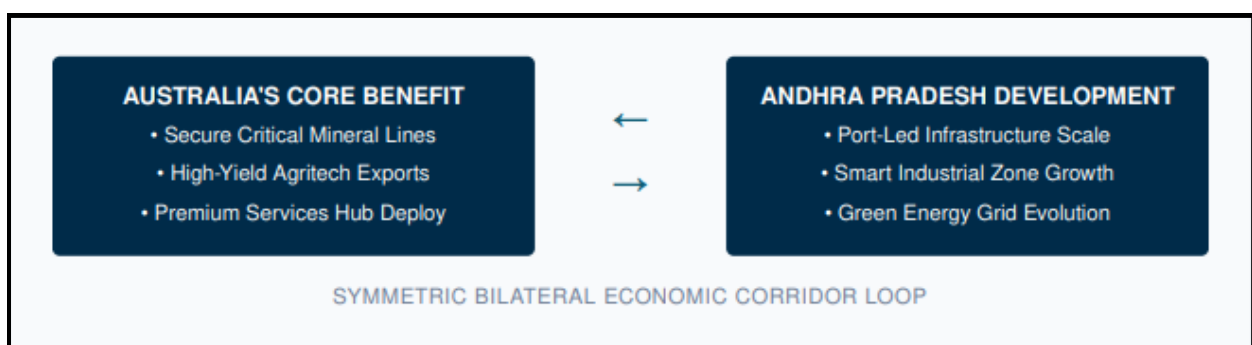
CA ANZ VIDHI ASHIK MODY
PRINCIPAL FOUNDER, PINNACLE ADVISORS

OUR APPROACH: THE RECIPROCAL GROWTH ARCHITECTURE

The Australia-India Economic Cooperation and Trade Agreement (ECTA) successfully laid the institutional foundation for reduced tariff barriers on goods. However, the true frontiers of the economic partnership remain constrained by subnational market navigation hurdles, structural bottlenecks in service trade, and incomplete recognition of professional credentials.

This submission provides the Australian Government with a strategic recommendation in a cross-border-led, sub-national blueprint to optimise the upcoming Comprehensive Economic Cooperation Agreement (CECA) framework. It presents a data-driven case for designating Andhra Pradesh as Australia's subnational gateway to India.

Crucially, this framework introduces a symmetric growth engine: by matching Australia's sovereign strengths in resources, technology and capital with Andhra Pradesh's industrial ambitions, CECA can unlock massive commercial returns for Australia's industry while simultaneously driving fast-tracked infrastructure development, port modernisation and green industrialisation for Andhra Pradesh.





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1. ACKNOWLEDGEMENT

Thank you for the opportunity to provide a submission to the Australia–India Comprehensive Economic Cooperation Agreement (CECA) negotiations. We welcome DFAT's invitation to individuals, businesses, and stakeholders to contribute, and we are pleased to present a substantive, practitioner-grounded perspective on the bilateral corridor.

We note that this consultation has already attracted submissions from some of Australia's most credible and respected institutional stakeholders – including representatives across the agricultural, resources, professional services, education, and infrastructure sectors. Organisations such as the Australian Chamber of Commerce and Industry, the Australia India Business Council, Business Council of Australia, and Minerals Council of Australia have participated in earlier rounds of this process, and the quality of that evidence base reflects the depth of the bilateral relationship.

This submission seeks to complement that institutional foundation with strategic advisory-level insight from within the professional services and cross-border advisory corridor – a dimension of the bilateral relationship that we believe deserves dedicated attention in the CECA framework.

This submission is written by Vidhi Ashik Mody, Principal of Pinnacle Advisors – a specialist accounting and advisory practice with over a decade of daily engagement in the Australia–India trade, tax, and compliance landscape. It is not a brief email. It is a more comprehensive analytical recommendation, focused on resolving specific market challenges and proposing concrete mechanisms through which CECA can address them.



2. ABOUT US

Pinnacle Advisors is a boutique advisory and accounting firm based in Mumbai & Melbourne, helping businesses navigate the Australian jurisdiction with ease. We provide comprehensive hand-holding for global businesses across the business lifecycle, including initial due diligence, incorporation, accounting, payroll, bookkeeping, and taxation, complemented by strategic advisory services tailored to each business's unique needs.

Our approach focuses on delivering globally aligned financial solutions while maintaining strong compliance and operational efficiency. We believe in impact over volume; partnership over process and clarity over complexity.

At Pinnacle Advisors, the India–Australia corridor is not a niche offering. It is the foundation of what we do. Our founder holds the Australian CA qualification through CA ANZ, is a Registered BAS Agent under the Tax Practitioners Board, and has deep professional and personal roots in both countries. We advise Indian businesses entering Australia, Australian businesses entering India, and individuals navigating the corridor on GST compliance, business establishment, market entry strategy, and cross-border structure, from both sides.

3. PRINCIPAL FOUNDER



Vidhi Ashik Mody is the principal founder of Pinnacle Advisors, bringing over a decade of professional experience in the Australian accounting and taxation domain.

She did not become a Chartered Accountant to file tax returns. She grew up in India, studied Commerce at the University of Mumbai, and moved to Sydney in 2016 with a clear intention: to understand Australian accounting not from the outside, but from the inside.

She is registered with the Tax Practitioners Board (TPB), Australia, with extensive experience advising NRIs and global businesses on navigating the Australian regulatory, accounting, and taxation framework with ease. Over the years, she has developed insight that goes well beyond technical qualifications. She knows the ATO, how it thinks, what it looks for, and where businesses inadvertently create problems for themselves. She understands the India–Australia corridor and is fluent across the full Australian accounting tech ecosystem. Clients consistently describe feeling clearer, more confident, and more in control.

Qualifications:

- Bachelor of Commerce (BCom), University of Mumbai
- Master of Professional Accounting – University of New South Wales (UNSW)
- Chartered Accountant, Chartered Accountant of Australia and New Zealand (CAANZ)
- Registered Business Activity Statement (BAS) Agent, Tax Practitioners Board (TPB)

CAANZ Member ID (3022997) | TPB BAS Agent License Number (26089289)

4. OUR JOURNEY

A Decade Across Two Jurisdictions

2016 - Mumbai to Sydney: The Strategic Move

Relocated from Mumbai to Sydney as an international student to undertake a Master's degree at UNSW, driven by a clear intent to master the Australian tax, regulatory, and financial ecosystems from the inside out.

2016–2018 - UNSW Ambassador for Indian students

Recognised within the UNSW international student cohort and appointed as a UNSW Ambassador. Selected as a primary face for high-profile university marketing campaigns promoting Australian business education to incoming Indian students.

2016–2022 - Deep Practice Inside Australian CA Firms

Secured an accounting role at a Coogee-based boutique firm within four months of arrival. Gained hands-on experience within Australian accounting practices, managing complex ATO compliance jobs.

2019 - CA ANZ Qualification:

Formally achieved the prestigious Chartered Accountant designation through Chartered Accountants Australia and New Zealand (CA ANZ), completing the rigorous qualification early and on independent terms.

2019 - NSW Government Consulting & Policy Projects:

Contributed to key stakeholder engagement and strategic initiatives through Global Scope's Study NSW project, gaining firsthand exposure to Australian public policy and the interaction between legislative frameworks, government priorities, and the business environment.

2021 -Registered BAS Agent Credential

Formally registered with the Tax Practitioners Board (TPB) of Australia. This regulated credential established the legal framework for overseeing Indirect tax laws (GST), Business Activity Statements (BAS) submissions, Fringe Benefits Tax (FBT) compliance, and complex Single Touch Payroll (STP) structures.

2022 - Cross-Border Experience & Independent Advisory

Returned to India as a seasoned tax professional with over six years of experience, having in-depth experience of working across top Australian Accountancy firms and delivered 150+ highly rated projects across bookkeeping, taxation, and advisory services.

2024 - Pinnacle Advisors Founded

Identified increasing demand for trusted financial expertise within the Australia-India economic corridor and established Pinnacle Advisors to address this need. The firm supports Australian CA practices and businesses on both sides of the corridor with specialised accounting, taxation, compliance, and advisory services, facilitating cross-border growth and commercial collaboration.

Professional Memberships

- 1. Australia New Zealand (ANZ) Business Chamber**
- 2. Australia India Business Council (AIBC)**
- 3. India-Australia Business & Community Alliance (IABCA)**
- 4. Indo Australia Chamber of Commerce (AustCham)**

Recognitions

2025 IABCA Businesswoman of the Year Finalist

2026 IABCA Micro Business of the Year Finalist

For over ten years, cross-border advisory between Australia and India has been the daily focus of Vidhi's professional practice, advising clients on both sides, navigating two regulatory systems, and building a practice that understands the corridor not from a distance but from within it.

A curated archive of our institutional records, testimonials, and verifications can be accessed via this [Google Drive link](#).

5. THE MARKET CHALLENGE

While ECTA delivered critical tariff relief for commodities, it left several key pillars of the services trade and sub-national execution under-addressed. Trade data reveals an execution gap between what current trade agreements theoretically permit and what mid-market entities actually experience on the ground.

The **Three Structural Bottlenecks**: Three market challenges are most visible to us in practice:

1. **Sub-national market entry** is not supported by the current framework. Most Australian businesses entering India default to national-level approaches poorly calibrated to India's state-led economic architecture – resulting in delayed entry, misallocated capital, and missed opportunity.
2. **Professional qualification** recognition remains fragmented across key service sectors. Australian and Indian credentials are not consistently recognised in a manner that enables professionals to efficiently leverage their expertise across both jurisdictions, creating unnecessary barriers to labour mobility, knowledge transfer, and people-to-people economic engagement.
3. **Services trade infrastructure** lags behind goods trade. The bilateral relationship has developed more rapidly on goods than on services – yet professional services, tech, financial advisory, and education are precisely where the comparative strengths of both countries align most naturally.

This submission addresses, with particular focus on the first market challenge, mainly Sub-national market entry, the case for Andhra Pradesh as Australia's priority sub-national gateway. The analysis is grounded in first-hand corridor experience and supported by research from active organisations working across this segment.



6. WHY ANDHRA PRADESH

The long-term realisation of the Australia-India Comprehensive Economic Cooperation Agreement (CECA) will not be defined by macro-level diplomatic declarations, but by the precise execution of sub-national economic mapping. Historically, Australian commercial exploration has instinctively drifted toward India's oversaturated Tier-1 urban hubs, such as Bengaluru, New Delhi, or Mumbai. However, modern supply chain de-risking and corporate scaling demand geographical diversification toward specialised provincial corridors that align structurally with Australia's priority industries.

Andhra Pradesh (AP) is not a speculative proposition. It is a state that has undergone substantial structural transformation over the past decade – in infrastructure, industrial policy, port capacity, agribusiness, and technology. Its growth trajectory over the past ten years has been significant, and the alignment between AP's demonstrated strengths and Australia's priority export and investment sectors is structural, not coincidental. We believe CECA is the right vehicle to formalise it.

7. DECADE OF DEVELOPMENT (2016-2026)

Andhra Pradesh is one of India's fastest-growing coastal states and a strategic gateway to the Indo-Pacific region, offering Australian businesses access to a large consumer market, competitive operating costs, and strong export infrastructure. With a 974-kilometre coastline, multiple deep-water ports, extensive road and rail connectivity, and a growing industrial ecosystem, the state is well positioned for trade, logistics, manufacturing, agribusiness, renewable energy, education, technology, and professional services collaboration.

Home to over 50 million people and supported by a business-friendly investment environment, Andhra Pradesh combines a skilled workforce, abundant natural resources, and strategic proximity to key Asian markets, making it an attractive destination for Australian companies seeking to establish, expand, or diversify their presence in India.

Andhra Pradesh's present position as a top-tier investment destination is the result of a deliberate, ten-year structural rebalancing strategy split across three distinct phases:

Phase 1: Infrastructure Foundation (2016-2019)

Following state reorganisation, the government focused heavily on building a friendly environment for private capital. The state earned the #1 national ranking under the World Bank's Ease of Doing Business index by launching a unified single-window regulatory clearance framework. This period drew in major anchor investments, including Kia Motors (Anantapur), Foxconn (Sri City), and large expansions across the deep-water port at Visakhapatnam alongside the greenfield Ramayapatnam port project.



Phase 2: Administrative Consolidation & Maritime Dominance (2019-2024)

This phase stabilised investor confidence while optimising regional development. The state consolidated its position as a maritime export powerhouse, commanding approximately 42% of India's total marine export volumes. It also upgraded the processing capacity of the State Investment Promotion Board (SIPB) and improved state-to-federal investment governance mechanisms.

Phase 3: Re-Industrialisation & Green Energy Leadership (2024-2026)

The current operational landscape focuses on clean industrialisation. Backed by fast-tracked SIPB clearances, the state has built out substantial capacity in green hydrogen production, pumped-storage hydro, and clean energy component manufacturing. Driven by these modernisation efforts, Andhra Pradesh currently captures roughly 25% of India's total announced industrial capital investments.

8. CECA POLICY RECOMMENDATIONS

To move beyond basic tariff cuts, CECA should introduce precise, sector-specific regulatory mechanisms. Introducing a three-layered architecture, identifying the Problem, the Proposed Mechanism, and the Expected Shared Outcome ensures actionable policy design.

8.1 Category A: Mitigating Operational & Regulatory Friction

Recommendation 1: Streamline Agricultural Border Inspections

The Problem: Redundant phytosanitary and food-safety testing regimes for agricultural imports at designated ports add unnecessary transaction costs and storage delays without adding risk mitigation benefits.


Proposed Mechanism: Establish a risk-based mutual recognition framework for food-safety testing and sanitation compliance standards between Australian agricultural exporters and state-level port authorities.

Expected Shared Outcome: Both regions experience streamlined biosecurity processes and accelerated bilateral agricultural trade. Australian premium produce gains efficient access to southern Indian markets, while Andhra Pradesh's major ports (Visakhapatnam, Kakinada, and Ramayapatnam) capitalise on increased container volumes by serving as premier, highly automated distribution hubs for perishable goods.

Recommendation 2: Transition Tariffs to Flexible, Capacity-Linked Windows

The Problem: Rigid quota caps on Australian pulse and grain imports create market volatility and hinder predictable trade patterns.

Proposed Mechanism: Transition fixed or punitive import tariffs into rolling, transparent import quota windows calibrated directly to the processing and absorption capacity of Andhra Pradesh's active mega food parks.



Expected Shared Outcome: Australia's agricultural sector gains predictable, high-volume multi-year sales. Meanwhile, Andhra Pradesh secures steady feedstock inputs that directly feed and justify the infrastructure expansion of its localised agro-processing zones.

8.2 Category B: Establishing Co-Investment Infrastructure Corridors

Recommendation 3: Bilateral Maritime Customs Fast-Lanes

The Problem: Bulk shipments of critical minerals face standard commercial cargo congestion lanes. This bottleneck extends lead times for industrial deployment. It also exposes vital energy transition supply chains to avoidable geopolitical transit risks.

Proposed Mechanism: Establish dedicated, digitally monitored bilateral maritime green lanes connecting Western Australian mineral ports directly with the deep-water receiving hubs of Andhra Pradesh at [Visakhapatnam](#) and [Ramayapatnam](#). These dedicated corridors will bypass traditional multi-state transit routes by utilising integrated blockchain documentation, pre-arrival customs clearances, and automated biosecurity scanning to route Australian raw bulk shipments straight into Andhra Pradesh's coastal infrastructure.

Expected Shared Outcome: Australia secures a high-value, long-term export destination for its upstream resource sector. Concurrently, Andhra Pradesh leverages these consistent flows to scale up its port infrastructure, automated cargo handling facilities, and coastal industrial zones. This direct pipeline positions the state to become India's premier, self-contained hub for downstream critical mineral processing and battery manufacturing.

Recommendation 4: Sub-National Investment Tracking Nodes

The Problem: National-level foreign direct investment (FDI) tracking aggregates data at the federal level. This masks regional success metrics, dilutes state-specific incentives, and makes it difficult to optimise capital allocation for localised industrial corridors.



Proposed Mechanism: Establish a dedicated Sub-National Investment Desk within DFAT (collaborating with Austrade and Invest India). This institutional node will actively monitor, de-risk, and report capital flows directed into Andhra Pradesh's specialised corridors. It will provide Australian investors with localised regulatory navigation, early-stage project pipelines, and direct state-level troubleshooting mechanisms.

Expected Shared Outcome: Australian institutional investors gain unmatched data clarity and risk mitigation for regional deployments. Concurrently, Andhra Pradesh secures long-term, predictable capital injections. This funding will target public-private partnerships (PPPs) dedicated to building out green logistics corridors, industrial water systems, and smart manufacturing ecosystems.

8.3 Category C: Strategic Tariff Harmonisation & Structural Incentives

Recommendation 5: Strategic Optimisation of Critical Mineral Supply Chains:

Suggestion: Maximise the tariff-free provisions of the federal Australia-India Economic Cooperation and Trade Agreement (ECTA) to funnel raw and minimally processed critical minerals directly into Andhra Pradesh's specialised manufacturing zones.

Proposed Mechanism: Implement zero-state-tax structural incentives—including full State GST (SGST) credits, dedicated land banks, and accelerated single-window clearances—for unrefined or minimally processed critical minerals (Lithium, Cobalt, Nickel) entering Andhra Pradesh's Special Economic Zones (SEZs) and industrial clusters.

Expected Shared Outcome: Australia captures a highly predictable, long-term market share for its upstream resource sector. Concurrently, Andhra Pradesh leverages lowered input costs to construct world-class battery manufacturing and electric vehicle (EV) component infrastructure, solidifying its position as India's primary clean energy industrial hub.

Recommendation 6: Agritech Infrastructure Fiscal Subsidies

The Problem: The adoption of advanced agricultural technology and cold-chain systems is hindered by high upfront capital costs and complex local supply networks. This delays the modernisation of rural storage and leads to high post-harvest losses.

Proposed Mechanism: Leverage the tariff-reduction frameworks of the federal India-Australia ECTA while deploying Andhra Pradesh's specialised **Food Processing Policy** incentives. The state will provide a fast-tracked 35% to 50% capital subsidy and complete State GST (SGST) reimbursements for local enterprises purchasing advanced Australian agritech, automated farming equipment, and thermal cold-chain systems.

Expected Shared Outcome: Australian agritech exporters secure high-volume commercial sales in a rapidly expanding agricultural market. Concurrently, Andhra Pradesh rapidly upgrades its rural cold-storage infrastructure, scales its integrated warehouse networks, and minimises post-harvest supply chain wastage for its primary export crops.


9. STRUCTURED BILATERAL ACTION

The transition from ECTA to CECA represents more than a tariff adjustment; it is an institutional evolution. By anchoring Australia's premium capabilities in resources, institutional capital, and agritech within Andhra Pradesh's high-growth industrial and maritime architecture, both nations move beyond standard transactional trade to establish a highly resilient, structurally integrated economic corridor.

To operationalise this sub-national bridge, the Principal and Pinnacle Advisors formally present the following strategic requests to the Australian Government and DFAT:

Establish an Official Sub-National Trade Track: Formally advocate for the integration of a dedicated "**Sub-National Cooperation Annexure**" within the final CECA text. This institutional mechanism will legally empower federal agencies to clear targeted regulatory fast-lanes, pilot digital customs green lanes, and deploy dedicated investment desks focused exclusively on high-performing industrial states like Andhra Pradesh.

Launch a Joint Critical Minerals & Infrastructure Working Group: Form a dedicated, bilateral sub-national coalition linking Western Australian resource exporters and Australian institutional investors directly with the Andhra Pradesh State Investment Promotion Board (SIPB). This specialised working group will coordinate project-ready capital flows, streamline licensing pipelines, and fast-track the co-development of downstream battery manufacturing ecosystems within the Visakhapatnam and Ramayapatnam industrial nodes.



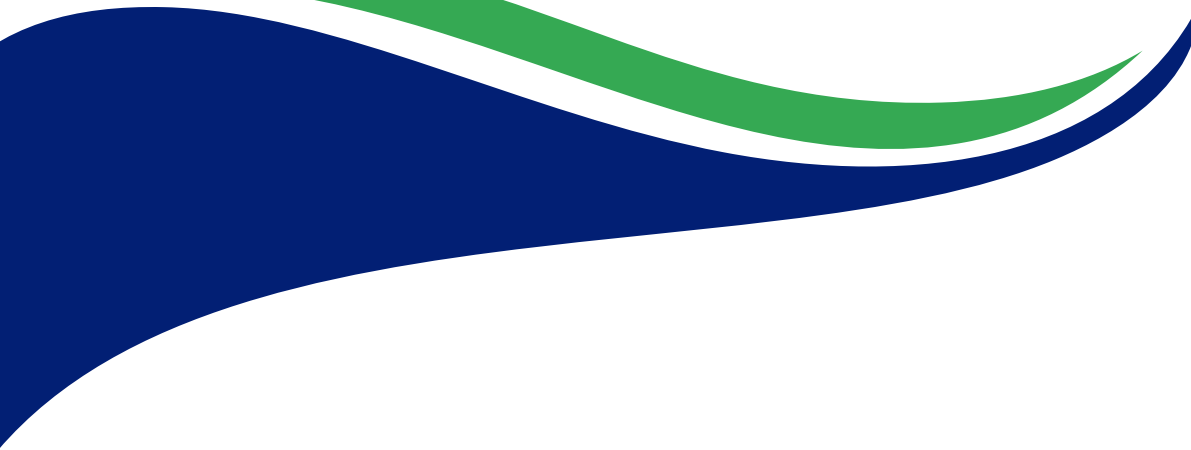
Operationalise Co-Investment Pilot Projects: Task the bilateral working group with launching immediate, high-visibility pilot projects in Andhra Pradesh's primary agricultural and aquaculture clusters (e.g., Krishna, Guntur, and Godavari regions). By matching federal India-Australia ECTA tariff rollbacks with Andhra Pradesh's 50% capital subsidies, the facility will de-risk commercial entry for Australian tech firms while rapidly building out zero-waste thermal warehouse corridors.

10. CONCLUSION

The transition from ECTA to CECA represents far more than a routine tariff adjustment; it is a profound institutional evolution. By anchoring Australia's premium capabilities in institutional capital, upstream critical minerals, and agritech directly into the high-growth industrial nodes, automated ports, and tech corridors of Andhra Pradesh, both nations move beyond standard transactional trade to build a highly resilient, structurally integrated sub-national economic corridor. To turn this strategic vision into immediate reality, the Australian Government and DFAT must take decisive bilateral action: formally integrate the Sub-National Cooperation Framework into the final CECA text, deploy the Joint Critical Minerals Working Group across the Visakhapatnam-Ramayapatnam nodes, and launch the Australia-Andhra Pradesh Agritech Activation Facility.

Pinnacle Advisors operates with a highly specialised mandate focused on this exact corridor, serving as a true bridge that actively connects Australian and Indian businesses through targeted capital and technology deployments within the growing industrial architecture. We are fully committed to supporting this institutional evolution, leveraging our specialised expertise to translate high-level bilateral policy into tangible, regional economic outcomes across the Australia-India corridor

As a proud 2026 IABCA Micro Business of the Year Finalist, Pinnacle Advisors will be participating in the invitation-only IABCA Future of Industries Roundtable at Australian Parliament House on Thursday, 2 July 2026. Co-hosted with The Hon. Dr Andrew Charlton MP, Cabinet Secretary and Assistant Minister for Science, Technology and the Digital Economy, this forum provides the ideal platform to formally share and advocate for these sub-national recommendations ahead of the forthcoming visit of the Prime Minister of India to Australia in July 2026. We look forward to actively contributing to subsequent bilateral discussions and working collaboratively to advance this vital economic partnership



We trust our submission has been of assistance. We would be grateful for the opportunity to meet with relevant DFAT personnel to discuss these recommendations in further detail, explore how we can support the implementation of these sub-national frameworks, and receive an update on the progress of the CECA negotiations. To arrange a suitable meeting time, please contact me directly at **+61 432 840 793** or via email at [**vidhi@pinnacleadvisorss.com**](mailto:vidhi@pinnacleadvisorss.com).

Kind Regards,

Vidhi Mody

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B. Com, MPA (Professional), BAS Agent, CA from CAANZ

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