



# TASMANIAN BEEKEEPERS ASSOCIATION INC.

[www.tasmanianbeekeepers.org.au](http://www.tasmanianbeekeepers.org.au)

Department of Foreign Affairs and Trade  
Via email: [FTAModernisation@dfat.gov.au](mailto:FTAModernisation@dfat.gov.au)

Dear Sir/Madam

## **Submission to the General Review of the Indonesia–Australia Comprehensive Economic Partnership Agreement (IA-CEPA)**

The Tasmanian Beekeepers Association (TBA) welcomes the opportunity to provide input to the General Review of the Indonesia–Australia Comprehensive Economic Partnership Agreement (IA-CEPA). TBA is the peak industry body representing beekeepers in Tasmania, with members across commercial production, pollination services, queen breeding, biosecurity, research and education.

TBA supports IA-CEPA in principle and recognises the importance of a strong and practical trade relationship between Australia and Indonesia.

From TBA's perspective, the value of IA-CEPA is not limited to large-volume agricultural commodities. It is also important that the agreement works in practice for smaller, high-value and premium food producers, including honey and other bee products.

DFAT notes that over 99 per cent of Australian goods exports to Indonesia became duty free or benefited from significantly improved preferential arrangements under IA-CEPA, and that the agreement provides improved access for Australian agricultural goods more broadly. TBA supports this direction and encourages continued work to ensure that niche and premium agricultural sectors are also able to make practical use of these settings.

For sectors such as honey, the key issues are often not tariffs alone, but the practical operation of market access arrangements. In our view, the General Review should pay close attention to regulatory and administrative barriers that can disproportionately affect smaller exporters, including certification requirements, labelling, documentation, customs processes and other technical compliance obligations.

This is consistent with the structure of IA-CEPA itself, which includes chapters dealing with non-tariff measures, customs procedures, trade facilitation, sanitary and phytosanitary measures, and technical barriers to trade. Those are the areas most likely to determine whether smaller premium exporters can realistically access the Indonesian market.

TBA notes the relevance of Indonesia's halal certification framework for imported food and beverage products.

While pure honey would generally be understood as a halal product, it is important that certification and compliance arrangements are clear, practical and proportionate for smaller Australian exporters, so that avoidable cost, delay or uncertainty does not become a barrier to trade.

TBA encourages the Australian Government to continue working closely with Indonesian counterparts and Australian industry to ensure these arrangements are implemented in a practical, transparent and proportionate way. For smaller food exporters, unclear or burdensome compliance settings can become a real barrier to trade even where headline market access settings are favourable.

Tasmania is well placed to contribute to Australia's reputation for premium, clean and high-quality agricultural products. While honey may not currently be a major export line into Indonesia compared with some larger commodities, premium food demand and the growth of higher-value consumer segments create potential opportunities over time.

Accordingly, TBA considers it important that IA-CEPA implementation remains practical and accessible not only for major commodities, but also for smaller sectors seeking to develop new commercial opportunities in premium food markets. DFAT has highlighted Indonesia as an important and growing market and has emphasised the role of IA-CEPA in improving access for Australian goods, including agriculture.

TBA recommends that the Australian Government, through the General Review of IA-CEPA:

1. Continue to strengthen practical market access outcomes for Australian agricultural exporters, including smaller and premium food sectors.
2. Prioritise reduction of non-tariff and administrative barriers that may disproportionately affect smaller exporters, including certification, labelling, documentation and customs processes.
3. Work closely with industry on Indonesia's halal implementation settings to minimise unnecessary compliance burden, uncertainty and delay for Australian food and beverage exporters ahead of the 17 October 2026 implementation date.
4. Provide clear, sector-friendly guidance and engagement for niche agricultural industries, including honey and bee products, so that smaller exporters can better understand and use IA-CEPA in practice.

TBA supports IA-CEPA and the broader Australia–Indonesia trade relationship. This review is a useful opportunity to ensure that the agreement continues to deliver not only for major export sectors, but also for smaller premium agricultural industries with future growth potential.

TBA would welcome practical improvements that make the agreement easier to use, reduce avoidable compliance friction, and support Australian producers seeking to build trusted market opportunities in Indonesia.

Yours sincerely,



**Jan Davis**  
**Secretary**

*30<sup>th</sup> March 2026*