Submission to the Department of Foreign Affairs and Trade

General Review of the Regional Comprehensive Economic Partnership Agreement

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EXECUTIVE SUMMARY

Australian Catholic University (ACU) welcomes the opportunity to contribute to Australia's input to the General Review of the Regional Comprehensive Economic Partnership Agreement (RCEP). The Department of Foreign Affairs and Trade (DFAT) is seeking views on implementation, gaps and opportunities to improve or expand RCEP, including in services and digital trade.[1]

International education is a major Australian export, generating approximately $55 billion in education-related export income in 2025.[2] However, this measure does not capture the full scale of Australian universities' offshore activities, including income generated through offshore campus operations. As international education increasingly encompasses institutional partnerships, transnational delivery, research collaboration and digital education, Australia's regional trade settings need to respond to a broader range of international engagement models.[3]

ACU's primary recommendation is that Australia use the General Review to reduce unnecessary regulatory friction affecting cross-border education and research and to strengthen mechanisms for regional research and innovation collaboration, while preserving appropriate quality assurance, academic standards, professional accreditation, research integrity and legitimate public policy safeguards.

ACU proposes three priority reforms:

- Regulatory transparency for contemporary transnational education and institutional partnerships: clearer, more predictable and proportionate rules that accommodate partner-based, joint, dual, digital and hybrid delivery models, alongside transparent arrangements for articulation and academic pathways.
- Coordinated research mechanisms: stronger RCEP arrangements for complementary and co-funded research, research training and enduring institutional platforms in areas of shared regional priority.
- Mobility and digital enablement: practical settings that facilitate short-term academic and researcher mobility and trusted cross-border digital education and research.

ACU recognises that these objectives will require different implementation mechanisms. Some may be advanced through review of existing RCEP commitments and schedules; others through regulatory cooperation, improved transparency and voluntary initiatives under the Agreement's economic and technical cooperation framework. ACU does not propose harmonisation of national education systems or the displacement of domestic regulatory authority. ACU seeks more effective coordination between existing systems to facilitate high-quality education and research partnerships.

These reforms should be supported by stronger qualification and professional recognition, capability-building through RCEP economic and technical cooperation, and mechanisms to identify and resolve implementation barriers.

This agenda is consistent with RCEP's existing architecture, which already includes services, temporary movement, electronic commerce and economic and technical cooperation. It would also build on regional developments such as the upgraded ASEAN–Australia–New Zealand Free Trade Area (AANZFTA) education services cooperation framework, particularly Annex 8D, which provides for cooperation on qualification recognition, digital and blended delivery, credit transfer, TNE quality assurance, research collaboration, and staff and student exchange.[4] It is also consistent with the ASEAN Work Plan on Education 2026–2030, which provides a regional framework for strengthening education systems and advancing a resilient, innovative, dynamic and people-centred ASEAN.

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[1] Australian Government, Department of Foreign Affairs and Trade, 'RCEP General Review and submissions', 2026: https://www.dfat.gov.au/trade/agreements/in-force/rcep/submissions.

[2] Australian Government, Department of Education, 'Education export income', 2025 data, https://www.education.gov.au/international-education-data-and-research/education-export-income-calendar-year.

[3] Australian Government, Department of Education, 'Offshore delivery of Australian higher education courses', 2024 data: https://www.education.gov.au/international-education-data-and-research/offshore-delivery-australian-higher-education-courses.

[4] ASEAN – Australia – New Zealand Free Trade Area (AANZFTA), Annex 8D - https://www.dfat.gov.au/trade/agreements/in-force/aanzfta/official-documents/agreement-establishing-asean-australia-new-zealand-free-trade-area-aanzfta/annex-8d-education-services-co-operation.

CONTEMPORARY TRANSNATIONAL EDUCATION MODELS

Recommendation: Australia should seek greater regulatory transparency and predictability for contemporary TNE arrangements and related institutional partnerships across RCEP economies, including partner-based delivery, joint and dual awards, digital and hybrid delivery, and articulation and pathway arrangements where relevant. This should include accessible information on licensing and approval requirements, responsible authorities, indicative processing timeframes and material regulatory changes, while preserving domestic quality assurance and student protection requirements.

International education is no longer centred only on students travelling to another country to study. Australian universities increasingly use partner-based delivery, articulation and pathways, joint and dual awards, block and intensive teaching, and digital or hybrid delivery. Australian Government data confirms that 107,437 students were enrolled in Australian higher education courses offshore globally in 2024, including through offshore campuses, institutional partnerships and distance education.[5]

Regulatory frameworks for foreign higher education vary considerably across the region. Requirements may concern establishment, ownership, local partnerships, program approval, registration, curriculum, staffing and delivery. These requirements may serve legitimate domestic objectives, but complexity, duplication, limited transparency and lengthy approval processes can create avoidable barriers.

Greater regulatory transparency should extend to the different ways in which universities establish and operate international partnerships. Regulatory frameworks should not assume that foreign education provision necessarily requires a conventional branch campus where domestic law permits alternative arrangements. Partner-based delivery shared academic provision, joint and dual awards, and digital or hybrid models may involve different institutional responsibilities and approval requirements.

Clear guidance on the treatment of these models would reduce uncertainty for institutions and regulators while preserving domestic quality assurance, academic standards and student protection requirements.

Contemporary TNE and collaborative research also depend on the ability of academics, researchers and specialist staff to undertake short-duration and intermittent activity across RCEP economies. The General Review should examine whether existing temporary entry commitments and their domestic implementation adequately support activities such as block teaching, quality assurance, research supervision, collaborative research and institutional partnership development, with greater transparency and predictability where domestic law permits these activities.

Cross-border partnership arrangements should also provide appropriate safeguards for students, including clarity about institutional responsibilities, continuity of delivery and teach-out obligations where a partnership changes or concludes, consistent with applicable domestic requirements.

Digital education and research collaboration also depend on reliable cross-border data arrangements, secure digital infrastructure and trusted mechanisms for verifying academic credentials. Australia should encourage practical cooperation under RCEP's electronic commerce framework to support these activities, consistent with applicable privacy, cybersecurity, intellectual property and data protection requirements. The objective should be to improve interoperability and regulatory clarity rather than displace legitimate domestic safeguards.

QUALIFICATIONS, CREDIT AND PROFESSIONAL RECOGNITION

Recommendation: Strengthen cooperation on qualifications, academic credit, prior learning and professional recognition without displacing institutional academic judgement or professional standards.

[5] Australian Government, Department of Education, 'Offshore delivery of Australian higher education courses', 2024 data: https://www.education.gov.au/international-education-data-and-research/offshore-delivery-australian-higher-education-courses.

Cross-border education works best when students, institutions, employers and regulators can understand how qualifications and learning are recognised. RCEP should strengthen cooperation between governments, education authorities, quality assurance agencies and relevant professional bodies on transparent recognition arrangements.

This should extend beyond completed qualifications to academic credit, prior study, articulation pathways, joint and dual awards, and shorter-form or digital credentials where appropriate. Recent regional arrangements provide useful precedent: the upgraded AANZFTA[6] education services framework includes cooperation on qualification systems, recognition, digital education and mechanisms supporting recognition and transfer of academic credit.

Professional recognition should be approached in the same way: greater transparency of registration requirements, information exchange between regulators, digital verification of qualifications and clearer pathways for graduates to satisfy additional local requirements. This should not require automatic equivalence or weaken public protection.

Decisions concerning academic credit, admission and qualification recognition should remain subject to institutional academic judgement and applicable regulatory requirements. Professional registration and recognition should remain the responsibility of relevant professional authorities, consistent with domestic standards and public protection obligations.

RESEARCH COLLABORATION AND COORDINATED FUNDING

Recommendation: Australia should seek to establish research and innovation cooperation as a substantive priority within RCEP's economic and technical cooperation framework. This should include voluntary mechanisms for participating governments to identify shared priorities, coordinate complementary funding opportunities, support collaborative doctoral training and facilitate enduring institutional research partnerships, without requiring the establishment of a centralised RCEP research funding scheme.

Such cooperation should operate consistently with participating countries' requirements for research integrity, foreign interference risk management, intellectual property protection, data governance and national security.

Universities contribute to regional integration through research, innovation, knowledge exchange, research training and institutional capability as well as education services. Shared regional challenges affecting human flourishing and economic and social resilience, including health and wellbeing, demographic change, education and human capital, responsible AI and digital transformation, social cohesion, disaster resilience and climate resilience, require sustained collaboration across borders.

A practical constraint is fragmentation of research funding. National schemes appropriately reflect domestic priorities, but different eligibility rules, application windows, assessment processes and project timelines can make genuinely joint programs difficult even where governments share policy objectives. RCEP could provide an enabling framework for matched or complementary funding, coordinated calls, seed funding, joint PhD and research training programs, researcher mobility and research translation, while leaving funding administration with national systems.

ACU's participation in Vietnam's Project 89 doctoral scholarship initiative illustrates how government funding and institutional contributions can be combined to support international research training. This approach aligns with the Australia–Vietnam Enhanced Economic Engagement Strategy Implementation Plan,[7] which expressly identifies Australian support for Project 89, stronger institutional partnerships, research collaboration and increased joint doctoral qualifications.[8] ACU also supports applications for Indonesia's government-funded Lembaga Pengelola Dana

[6] ASEAN – Australia – New Zealand Free Trade Area (AANZFTA), Annex 8D - https://www.dfat.gov.au/trade/agreements/in-force/aanzfta/official-documents/agreement-establishing-asean-australia-new-zealand-free-trade-area-aanzfta/annex-8d-education-services-co-operation.

[7] Australian Government, Department of Foreign Affairs and Trade, Australia-Vietnam Enhanced Economic Engagement Strategy, Implementation Plan, Section 4: Education, Skills and Training, https://www.dfat.gov.au/australia-vietnam/eees/en/implementation-plan/education-skills-and-training.html.

[8] Government of Vietnam, Prime Minister's Decision No. 89/QD-TTg, 18 January 2019, Approving the Scheme for Enhancing the Capacity of Lecturers and Administrators of higher Education Institutions, 2019-2030, https://vanban.chinhphu.vn/default.aspx?docid=196014&pageid=27160.

Pendidikan (LPDP) scholarships. These arrangements demonstrate practical approaches to aligning national investment and institutional capability to strengthen regional research training and enduring academic relationships.

ACU's research strategy emphasises long-term global partnerships that connect research, translation, education and research training, particularly across the Asia-Pacific. ACU is developing the Indonesia–Australia Human Flourishing Centre in partnership with Universitas Gadjah Mada. The Centre is intended to provide a platform for collaborative research, research training and knowledge exchange in areas of shared regional importance. Such partnerships demonstrate the potential for coordinated institutional and government investment to strengthen regional research capability.

This approach is consistent with the Australia–Indonesia Comprehensive Strategic Partnership Plan of Action 2025–2029, which promotes joint research, academic collaboration, joint and double degrees, and credit transfer.[9]

Within this framework, ACU encourages Australia to explore the following practical measures with RCEP partners:

- periodic identification of a limited number of shared research and innovation priorities;
- voluntary coordination of national funding opportunities, including matched funding where appropriate;
- greater visibility of collaborative funding opportunities across RCEP economies; and
- support for enduring institutional platforms connecting research, HDR training, mobility, industry, government and communities.

The opportunity is to make existing national investment more interoperable, using RCEP to complement and extend bilateral cooperation initiatives rather than duplicate them. Australia's existing economic engagement frameworks with Vietnam and Indonesia demonstrate that this approach is already consistent with national policy priorities.

TRANSPARENT IMPLEMENTATION AND CAPABILITY BUILDING

Recommendation: Australia should encourage RCEP parties to develop a coordinated, publicly accessible information framework that links existing national regulatory resources and identifies relevant authorities, market-access commitments, approval processes and contact points for education services. This should be complemented by a periodic stakeholder consultation mechanism to identify implementation barriers and prioritise practical improvements.

Services commitments can be difficult for institutions to translate into practical operating requirements because relevant rules may sit across treaty chapters, country schedules, reservations and domestic regulation. A coordinated information framework should therefore provide accessible links to authoritative national sources, including relevant market-access commitments, education regulators, approval requirements, qualification recognition arrangements and temporary entry settings. Responsibility for maintaining domestic regulatory information should remain with the relevant national authorities.

RCEP should also establish a practical mechanism for education and research stakeholders to identify implementation barriers after the General Review. Periodic engagement between trade officials, education and research ministries, regulators, funding bodies and universities could distinguish issues requiring treaty change from those better addressed through domestic implementation, regulatory cooperation, coordinated research funding or economic and technical cooperation.

Finally, RCEP's economic and technical cooperation framework should be used not only to facilitate greater cross-border activity, but also to build the institutional capability needed for participating economies and universities to engage sustainably in regional education and research networks. Priorities could include TNE quality assurance, research management and integrity, qualification transparency, digital credentialling, academic and research mobility,

[9] Australian Government, Department of Foreign Affairs and Trade, Australia-Indonesia Comprehensive Strategic Partnership Plan of Action 2025-2029, Section 2.2, https://www.dfat.gov.au/geo/indonesia/plan-of-action-for-the-indonesia-australia-comprehensive-strategic-partnership-2025-2029.

HDR development and responsible digital capability. RCEP already contains a dedicated Economic and Technical Cooperation chapter, providing an institutional basis for this work.

This approach would enable participating economies to strengthen institutional capability through existing regional and bilateral relationships, while avoiding unnecessary duplication of established cooperation mechanisms.

CONCLUSION

The RCEP General Review is an opportunity to align regional economic architecture more closely with the way universities now operate across borders. International education increasingly involves the movement of education, knowledge and research across borders, alongside the movement of students.

ACU encourages Australia to pursue a focused agenda: enable contemporary TNE models through transparent and proportionate regulation; improve recognition; establish stronger mechanisms for coordinated research and co-investment; facilitate academic and researcher mobility and trusted digital delivery; and create practical implementation and capability-building mechanisms.

These reforms should complement rather than duplicate bilateral initiatives and should preserve legitimate domestic requirements concerning academic standards, quality assurance, student protection, professional accreditation, research integrity, privacy and cybersecurity.

ACU would welcome further engagement with DFAT on the education, research and innovation dimensions of the General Review.