

25 February 2010

Attn: Ms Cathy Raper
Trade Commitments Branch
Department of Foreign Affairs and Trade
R.G. Casey Building
John McEwen Crescent
Barton, ACT 0221
Australia

Dear Ms Raper,

Submission Regarding Australia's Participation in a Trans-Pacific Partnership Agreement (TPP) Negotiations

In light of the upcoming first negotiation round with the new participants to the TPP, the Australian Chamber of Commerce, Singapore (AustCham Singapore) wishes to make a submission in response to the Trade Commitment Branch of the Department of Foreign Affairs and Trade's request for public comment.

AustCham Singapore is an organization which fosters, and provides a forum for business links between Australia, Singapore and the Asian region. AustCham Singapore currently has over 600 members covering a broad cross-section of the Australian business community in Singapore including Australian companies in Singapore, Australians working in Singapore and Singaporeans and other nationalities who have a connection to Australian business.

AustCham Singapore supports the Australian government's participation in the TPP negotiations and would take this opportunity to highlight the following areas of interest to our members:

1. AustCham Singapore views it as vital that Vietnam join negotiations at this round. As a significant emerging market in the region, Vietnam is an appealing investment destination for Australian business. Vietnam also has the potential to become a major export market for Australia. Singapore's regional hub status means Australian business based here is particularly well placed to take advantage of these opportunities. Australia currently has no free trade agreement with Vietnam. Bringing Vietnam into the TPP at this round represents an excellent opportunity to establish a FTA with Vietnam that will allow Australian business based at home and in Singapore to take advantage of these investment and export opportunities.
2. AustCham Singapore views the TPP platform as the most likely way of eventually achieving the long desired goal of an APEC wide free trade zone. Accordingly, when considering the terms of reference for the TPP, AustCham Singapore believe that they should be crafted with sufficient flexibility so as to facilitate the addition of a new country without detailed renegotiations each time a new member country wishes to join the TPP.

3. While the reduction of tariffs is an important first step to benefit our member companies operating in TPP member countries, behind-the-border barriers have become increasingly detrimental to the ability of our member companies to operate effectively overseas. AustCham Singapore therefore advocates a strong emphasis on consideration of behind-the-border issues during negotiations. These include non tariff barriers such as logistics and supply chain, licensing new products and registration of professionals.
4. AustCham Singapore encourages negotiations which aim for reciprocity in professional licensing in the TPP, particularly as relates to foreign lawyers, architects, and engineers. We would encourage the adoption of a “negative list” approach to any restrictions on trade or investment in services.
5. The easing of all restrictions on Foreign Direct Investment is encouraged by AustCham Singapore so as to create an environment in all TPP countries where domestic and foreign investment operates from a level playing field.
6. AustCham Singapore members would benefit from Regulatory standardization across all TPP countries for industries such as financial and pharmaceutical thereby enhancing trade and investment across the region. Such regulatory standardisation would dramatically increase efficiency for companies operating in the region.

AustCham Singapore is planning to hold an education and outreach programme in mid-2010 with its members. The purpose of this programme will be to seek further input for the TPP in areas that the members believe would enhance trade and investment across the region. At the conclusion of this programme AustCham Singapore will submit a second response. AustCham Singapore would welcome guidance on any specific areas you see of value for consultation with our members.

Yours sincerely



Nicholas Cocks
President - Australian Chamber of Commerce, Singapore