AK EUROPA

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AK Position Paper

EU-India Free Trade Agreement - sustainability-relevant aspects

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About us

The Federal Chamber of Labour is by law representing the interests of about 3.2 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore the Austrian Federal Chamber of Labour is a part of the Austrian social partnership.

The AK EUROPA office in Brussels was established in 1991 to bring forward the interests of all its members directly vis-à-vis the European Institutions.

Organisation and Tasks of the Austrian Federal Chamber of Labour

The Austrian Federal Chamber of Labour is the umbrella organisation of the nine regional Chambers of Labour in Austria, which have together the statutory mandate to represent the interests of their members.

The Chambers of Labour provide their members a broad range of services, including for instance advice on matters of labour law, consumer rights, social insurance and educational matters.

More than three quarters of the 2 million member-consultations carried out each year concern labour-, social insurance- and insolvency law. Furthermore the Austrian Federal Chamber of Labour makes use of its vested right to state its opinion in the legislation process of the European Union and in Austria in order to shape the interests of the employees and consumers towards the legislator.

All Austrian employees are subject to compulsory membership. The member fee is determined by law and is amounting to 0.5% of the members' gross wages or salaries (up to the social security payroll tax cap maximum). 560.000 - amongst others unemployed, persons on maternity (paternity) leave, communityand military service - of the 3.2 million members are exempt from subscription payment, but are entitled to all services provided by the Austrian Federal Chambers of Labour.

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President

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Executive Summary

The BAK is basically very critical of trade liberalisations. However, it prefers the multilateral process, which primarily includes developing countries, to bilateral free trade agreements. In its bilateral negotiations with developing countries, the EU should generally dispense with reciprocity and orientate its market access requirements towards India's level of development (e.g. in respect of India's retailing, milk and poultry production).

As a condition for the conclusion of the EU-India Free Trade Agreement, the BAK requests the ratification of all eight ILO Minimum Standards and selected environmental standards. The implementation and compliance with these minimum standards must be supervised by independent monitoring, involving the trade unions. It has to be ensured that the same implementation provisions apply to the Sustainability Chapter as to all other provisions of the Agreement. Hence, these provisions have to be subject to the same dispute settlement procedures as all other elements of the Agreement.

From the point of view of the BAK it has to be ensured that public services are bindingly exempt from the scope of the Free Trade Agreement. It is important that the room for manoeuvre in the case of public services is guaranteed, which is also particularly essential for the future social and economic development in India. In any case the European Commission must stop its efforts to undermine already established safeguards for public services in trade negotiations. Apart from that, the liberalisation of free movement of labour (mode 4) beyond the GATS level resp. CARIFORUM Agreement must be generally excluded.

Foreign direct investment policy has to be developed in a way that it induces a balance between the rights of investors and their duties. It must support positive investment behaviour by promoting sustainable investments as well as EU targets in respect of development, social, ecological, human and women's rights. Investment Protection Agreements should not contain exclusive rights as international investor-state dispute settlement procedures, but should be replaced by state-state dispute settlement mechanisms within the scope of the WTO. A comprehensive „Right to regulate" clause must comply with public interest and clearly give priority to measures and regulations over financial interests in particular with regard to foreign direct investments.

The AK position in detail

1. Contribution of foreign trade to economic growth and market access requirements of the EU

The contribution of foreign trade to economic growth is often overrated. The European Commission frequently makes assumptions, which do not adequately reflect the reality within the EU itself and even less in third countries. The majority of the demand for goods and services comes from the EU: 87 % of the EU's demand for goods comes from the EU itself. That means that only about an eighth of all goods produced in the EU are exported to third countries. Hence, the economy of the EU is primarily characterised by developments within the internal market, which can be influenced by economic policy. This also applies to Austria, where foreign trade concentrates on the EU internal market. That is why the decisive determinant for more growth and employment in Europe is still represented by the dynamics of domestic demand.

The impact of trade agreements on employees within the European Union and in third countries, which has been frequently presented by the European Commission, is controversial. The European Commission particularly praises improved market access and tariff dismantling as being the key for growth and wealth. EU foreign trade has contributed to growth in the European Union. However, the distribution of prosperity gains in the various global regions – also within the EU – is uneven and has created economic and social tensions. Studies have shown that the liberalisation and deregulation of market access does by no means always result in more wealth and economic growth, but may generate structural problems, often accompanied by rising unemployment, greater poverty etc. The argument that growth based on trade is sufficient for improving labour standards is henceforth questioned. Studies prove that over the past years trade liberalisations in Africa, Latin America, the NAFTA States as well as in Central and Eastern Europe have led to job losses on a large scale (Hobbs, G., Tucker, D., „Trading Away Our Jobs – How free trade threatens employment around the world", War on Want, March 2009).

According to the theory which implies that increasing exports lead to greater economic growth and thereby quasi automatically bring about better working conditions for employees, the increase in trade liberalisations over the past decades should have resulted in significant reductions of violations against labour laws or in the improvement of working conditions. This is even confirmed by the World Bank, when it admits that existing jobs are so-

metimes more easily lost in the course of trade liberalisations, than new ones are created. That is why the impact of dismantling trade barriers on the Indian market should be considered on a case-by-case basis. Possible negative effects of the liberalisation on the Indian economy and employment situation, caused for example by large multinationals accessing the market, should be taken into account.

2. Market access of the EU to the Indian market and its impact on sensitive industries

Retail companies

Retail is the most important basis for jobs and subsistence in India, closely following agriculture. The retail sector is characterised by small traders, who make up 98 % of the market. Only 4 % of their premises are larger than 46 square metres. Most Indian people do their shopping in small family-owned shops and markets and not in supermarkets. Abolishing the ban on European direct investment would have a massive impact on this sector, as it has to be feared that the large number of traders could be driven out by international corporations, which in turn would no longer ensure the supply of food particularly for the poorest part of the population. About 80 % of the Indian population lives on less than two US Dollars a day, about a third on less than one US Dollar a day. The current retail structure is important for the survival of many families, as they are often in a position to negotiation a discount.

Therefore, the Free Trade Agreement must not contain any regulations, which would make it more difficult for India to sustain the existing ban on European direct investment with regard to multi-brand retail. India's political scope to protect the existing structures of current retailing by disallowing foreign direct investment (FDI) must be maintained.

Impact of the EU's pressure in respect of market access on India's milk and poultry production

About 60 % of India's working population lives of agriculture. Milk, poultry and egg production, which is to a large extent in the hands of small scale and micro farmers, is thereby of particular significance. Further liberalisation – particularly concerning the export of surplus milk powder or poultry parts from the EU – threatens the often only possibility of earning an income for a large part of the Indian rural population.

The impact of tariff dismantling must be supervised and inspected by an independent body, which ensures a continuous evaluation. Any threat to the Right to Food must result in a review of the problematic provisions of the Free Trade Agreement.

Due to the extraordinary sensibility concerning India's rural population and security of supply, in particular tariff rates for poultry and milk products have to be exempt from tariff reduction obligations. Accordingly, no standstill clause must be allowed to cap current tariffs in this sector. The scope for political reactions to developments of supply and demand as well as to national and international price fluctuations must be maintained.

Production of generic drugs in India

The epidemic-like occurrence of diseases such as and in particular HIV/AIDS in combination with the increase of common diseases such as tuberculosis, malaria, yellow fever etc. confronts many developing countries with problems they can hardly solve themselves. On the one hand, the available palette of drugs to treat these diseases is still limited. Many of the drugs used are technologically outdated and, due to developing resistance, they are only effective to a certain degree; apart from causing serious side effects. However, newly developed drugs, for example against AIDS confront countries with a problem of cost. A large part of the population is not able to afford the necessary drugs and equally, due to a lack of financial resources, the public sector is, not in a position to cope with the demand. Furthermore the development of drugs both in industrial and developing countries has been marked by severe cuts over the last decades and there has been a general lack of interest by large pharmaceutical companies to develop new drugs for Southern markets with limited purchasing power.

For some years now, India has been producing high-quality generic drugs at relatively low prices. Governments, UNO and Doctors Without Borders have to rely on these significantly cheaper drugs to be able to treat people in developing countries. Due to the competition between manufacturers of generic drugs in India, the price of HIV/AIDS drugs for example has fallen by more than 98.5 %, from 10,000 US Dollar p.a. in 2000 to currently 150 US Dollar per person. This significant price cut has enabled the treatment of a vastly increased number of HIV/Aids patients worldwide: more than 80 % of HIV/AIDS drugs, which are used to treat about 6.6 million people in developing countries, come from Indian manufacturers; in addition, 90 % of HIV/AIDS drugs for children are produced in India.

Non-Governmental Organisations are concerned that the Agreement could also result in export bans of these significantly cheaper and lifesaving generic drugs from India to other countries. In addition, the investment provisions of the Free Trade Agreement provide pharmaceutical companies with more options to sue the Indian Government,

for example if it decides to cancel a patent in order to improve access to drugs, in which case it would act in the interest of public health.

We therefore request to ensure that generic drugs used to treat HIV/AIDS, tuberculosis, malaria, yellow fever etc will be exempt from the provisions of the Free Trade Agreement.

3. Services

Mode IV – Presence of Natural Persons

Any opening of the labour market within the scope of Mode IV, which goes beyond the offers of the not yet concluded GATS negotiations as well as the current obligations of the CARIFORUM Agreement is rejected with reference to the economic situation as well as the predictions of the European Commission and the Austrian Institute of Economic Research.

The economy of the European Union is stagnating and unemployment has reached record levels. More than 24 million and out of that 5.5 million young people in the EU are out of work. The labour market crisis in the Euro zone is reflected by a youth unemployment rate of 22.6 %, and in some EU countries the level of youth unemployment is more than 50 %.

However, Austria is also affected by the crisis. According to the Austrian Institute of Economic Research, her GDP will only grow by 0.6 %. The unemployment rate is forecast to increase to 7.1 %, and growth in 2013 will not be sufficient enough to reverse this development.

Protection of public services – Services of general interest

From an employee's perspective, it must be ensured that public services are bindingly exempt from the scope of the Free Trade Agreement.

Public services include all services that fulfil people's basic needs. Therefore, these services should not be forced to comply with market principles. An exhaustive definition of public services in the EU is not viable as there are significant differences in various Member States and on-going demands for regulatory flexibility. Insofar, we also reject any efforts towards an exhaustive classification or definition of public services within the scope of European trade policy. In this case, it would be the sole responsibility of the European Commission to define in its interpretation of "offensive commercial interests", which services are actually affected. However, this would significantly restrict or even cancel the decision-making competence and the room for manoeuvre of the Member States, and in particular of the communities in respect of public

services. The Member States must also continue to be able to decide on how they want to supply these services without restrictions. This is in contrast to relevant liberalisation obligations in the Free Trade Agreement, which is in particular characterised by a severe limitation of policy space due to its long-term binding commitments ("lock-in effect"). It is important to secure current and also any future scope for action in this sensitive area. Therefore it is necessary to exclude public services from the scope of the Free Trade Agreement. This goal is diametrically opposed to a final list of public services in potential schedules of commitment. Consequently we are also strictly opposed to the latest attempts of the European Commission to include detailed lists of public service providers in international trade agreements.

The principle of far-reaching self-determination of Member States, federal countries and municipalities in the sector of services of general interest is embedded in the Lisbon Treaty (Art 14 TFEU) and in the Protocol on Services of General Interest. Apart from that, the focus must be on already established protection standards in the Free Trade Agreement: under no circumstances must the so-called horizontal public utilities exemption in accordance with the EU-GATS obligation list be restricted. This exemption is based on a broad understanding of public services: it does not only include network connected services (such as water, energy, transport, postal services) but also sectors such as education, health, social services or culture. In addition, this clause underlines the central role of the national, regional and local level for a regulation of public services based on democratic needs. Hence, the more problematic are the latest attempts of the European Commission to restrict the scope of this exemption in negotiations for bilateral free trade agreements. Against this background, it must not be allowed that the EU-India negotiations permit any deterioration of already established protection standards.

Under reference of numerous examples, we would like to point out again that the universal, affordable and high-quality supply of services of general interest as well as good employment conditions are put at risk by unfettered liberalisation.

At the same time, we want to emphasise once again that we are strictly opposed to any demands of the EU for liberalising these services with regard to India. In doing so, the EU would increase the pressure of liberalisation on Member States and hardly be in a position to make a credible case that services of general interest are part of the European welfare and social model.

However, the continuation to provide room for manoeuvre for public services

is in particular also essential for the further social and economic development in India. The large number of demonstrations in India, where an end to privatising public services has been demanded, confirms the negative impact of liberalisations in these sectors on the population.

4. Investment policy

India's economy has been able to achieve her economic catching up process to become one of the emerging markets by applying a partially protectionist economic policy. In order to develop regional economic structures, direct investments are restricted and linked to performance requirements. This economically successful and very complex framework has to be respected by the EU and European demands to open the market for direct investments have to be subjected to a comprehensive socio-economic assessment. Apart from that, the Agreement must also provide the option to cancel or delay signed agreements in case of social distortions in order to be able to achieve socially compatible structural change. We are strongly opposed to the use of negative lists in respect of performance requirements to contractually restrict the scope of governments to shape economic and social policy.

Investment protection provisions

India has signed numerous bilateral investment protection agreements, among other with 23 EU Member States. However, the latest developments in international investment law resp. the disputed arbitration awards in investor-state dispute settlement procedures have led to a critical analysis of the exclusive investor right to sue states directly in Europe, as well as in India.

From our point of view the **following key elements are relevant to meet the European interests in the negotiations on investment provisions:**

- **Scope resp. definitions**

We believe that the new EU investment policy should be based on a clear and narrow definition of foreign direct investment, which promotes sustainable investment conduct and socio-ecological future-oriented investments in the respective recipient country. We are opposed to granting investments, which cover any kind of asset, a level of protection. Portfolio investments have to be excluded from the field of application as these represent pure financial transactions and possibly short-term speculations and therefore in the actual sense do not fall under foreign direct investment.

We request to exclude sensible sectors such as education, health, culture, services of public interest and public transport as well as policy areas such as labour and social issues, the environment, financial market regulation and tax policy from the area of application of an investment protection chapter.

• Standards for treatment

The term "fair and equitable" is rather vague. This wording has enabled investors to challenge a broad range of regulatory measures before international arbitration tribunals, including measures with a clear public purpose. We therefore request clarification of the term "fair and equitable" so that non-discriminating measures, which have been taken in good faith and in public interest cannot be challenged. Apart from that no umbrella clause is to be included. The fair and equitable treatment clause has to be clarified in such a way that a claimant may only sue if he is able to prove intended or de facto discrimination. In the light of recent decisions by international investment arbitration tribunals, the most-favoured nation clause has to be re-evaluated to avoid so-called forum shopping and thereby the - non-assessable - risk for the Member States to be sued in respect of regulatory measures by investors from states that are not part of the Agreement.

A compensation provision needs to be clearly specified. This clause has enabled investors to challenge a broad range of regulatory measures before international arbitration tribunals including measures in the public interest. A clear definition of standards to protect investors must be provided, which is not vulnerable to far-reaching and questionable interpretations. Diminished or lost future returns of investors due to regulatory measures in the public interest may not institute compensatory payments.

• „Right to regulate"

From our point of view, it is completely insufficient to include the unrestricted legislative power of the contracting states in the Sustainability Chapter or the Preamble, as this only has a subordinated effect! Both legislative power as well as public interest objectives must be standardised as independent facts in the text of the Agreement. To achieve this, a specific clause, which determines the law of the EU and its Member States, must be included. This clause shall also ensure that the public interest objectives are exempt from the scope of the Investment protection Chapter. The public interest objectives stated by the Commission (protection of public health, security and the environment) must be supplemented by the rights of employees, social legislation, human rights, financial market regulation, industrial policy and tax policy. However,

at the same time it has to be ensured that the ability of the state to intervene will remain in case of future socio-political developments.

The negotiation mandate states that regulatory measures shall only be possible if they are non-discriminatory. This is a large restriction of the regulatory options for the purpose of the "legitimate" public interest as demonstrated by many arbitration court decisions; hence the "right to regulate" clause has been reduced to absurdity.

• Performance requirements - Corporate responsibility

Investors' rights must go hand in hand with obligations. The obligation of foreign investors to legally abide by international human rights standards and in particular to ILO Core Labour Standards can, make a significant contribution to the socio-economic development of a country, such as India. European investors, who would like to be the beneficiaries of investment protection provisions, have to comply with the OECD-Guidelines of Multinational Enterprises, the UN Economic and Human Rights framework of reference as well as its guidelines as multilateral standards and in addition to relevant environmental agreements. Hereby, concrete approaches to corporate responsibility, such as adhering to due diligence, abiding by human rights standards also in the value chain, as well as transparency (information obligations towards relevant stakeholders and the interested public) and credibility criteria (independent monitoring, inclusion of relevant stakeholders) must also be part of performance requirements. The intention to grant investors preferential treatment in connection with an investment must be linked to the fulfilment of concrete criteria.

Dispute settlement mechanism for investors

We are in favour of future European investment protection provisions not to contain any international investor-state dispute resolution procedures and believe that the dispute settlement mechanisms between states provided for in bilateral free trade agreements resp. the state-state dispute settlement procedures within the scope of the WTO are also well suited for investment protection.

5. Sustainability Chapter: fundamental issues and key requirements

In the sense of sustainable development, future free trade agreements have to give the same priority to social and ecological objectives as they do to economic interests. Apart from that, the EU has to a certain degree remain coherent in all its policy areas - including its trade policy - and meet its international obligations, in particular concerning

human rights and the United Nations, ILO and OECD Conventions. Hence, the trade policy of the EU has to be designed in such a way that free trade agreements with third countries do not run counter to these agreements. Hence, the BAK welcomes that the new generation of bilateral free trade agreements includes so-called sustainability chapters and requests the compliance with all ILO minimum labour and selected environmental standards by the EU and its trading partners. The compliance with these minimum standards must be independently monitored and fall under the dispute settlement mechanism of the respective free trade agreement.

Report of the International Trade Unions Confederation on the compliance with the eight ILO-minimum labour standards

So far, India has not yet ratified ILO Conventions 87 (Freedom of Association and Protection of the Right to Organise Convention, 1948) and 98 (Right to Organise and Collective Bargaining Convention, 1949). There are federal and national laws for the regulations concerning trade unions in India; however, these frequently restrict basic trade union rights.

Employees in India were confronted with numerous attempts to undermine any effective trade union representation - often with the help of the government and by police force. Many employees for example, who took part in national mass protests demanding a minimum wage of INR 10,000 per month (ca. 145 Euro), price cuts resp. price controls for essential goods, an end to the privatisation of public services as well as a universal social security protection, were arrested or assaulted by the police.

More than 5,000 injuries were documented in 2011; there were more than 2,000 strike-related arrests as well as over 2000 strike-related dismissals. 179 people were injured by police.

Another problem is the lack of recognition of trade unions, in particular also by multinationals from industrial countries (e.g. Unilever, Ford, Hyundai).

Key elements for a Sustainability Chapter in bilateral free trade agreements

- **Compliance with all eight Core Labour Standards of the International Labour Organisation (ILO):** the contracting parties must ratify, implement into national law and effectively apply all Conventions, which are laid down by the ILO Declaration on Fundamental Principles and Rights at Work (Core Labour Standards). 183 States have already been committed to do so in their capacity as ILO members. The eight Core Labour Standards refer to the freedom of association and the right to collective bargaining, the removal of forced labour, the removal of child

labour and the ban on discrimination at work. We also request a ban on export production zones, as these zones normally do not even comply with the most basic national labour laws. Apart from that, the current official version of the 2008 ILO Declaration "Social Justice Declaration for a Fair Globalization" has to be adopted, according to which it has been explicitly clarified that the violation of Core Labour Standards must not be allowed to legitimise comparative advantages.

• **Additional ILO Conventions:** depending on the level of development of the partner countries, the EU should also request the implementation of ILO Convention 155 (Occupational Safety and Health Convention), the so-called "ILO Priority Conventions", i.e. Convention 122 (Employment Policy Convention), Conventions 81 and 129 (Labour Inspection Convention) and Convention 144 (Tripartite Consultation Convention) resp. the Conventions of the Decent Work Agenda.

• **Duty to report on the implementation status of labour standards:** the governments of both contracting parties should regularly report on the progress made regarding the implementation of all commitments undertaken in the Agreement. These include, apart from the commitments included in the ILO Declaration on Fundamental Principles and Rights at Work, any other possible applicable Conventions mentioned above.

• **Non-Lowering Standards Clause (resp. Upholding Levels of Protection Clause):** this provision shall ensure that existing social and environmental standards are not lowered in order to attract foreign investors. Apart from that, this commitment shall make reference to the fact that it applies to all regions of a country to avoid that the Agreement results in an increase in production in export production zones.

• **Sustainability impact assessments - contents, participation of social partners and follow up:** provisions concerning sustainability impact assessments should be included as well as in respect of measures, which will be taken as a result of these assessments. Sustainability impact assessments shall take into account all relevant aspects of the social and economic impact of the Agreement. These include the possibility to access high-quality public services and the application of different strategies, including trade-related strategies to achieve industrial development. Labour and employer representations as well as non-governmental organisations have to be involved in the evaluation of the sustainability impact assessment concerning the effects of the Agreement. A follow-op process after the sustainability impact assessment must be determined.

• **Forum for the exchange of information between governments and social partners:** a forum for trade and sustainable development should be set up, which enables the exchange of information on the implementation of the Agreement between representatives of governments and partner countries on the one hand, and labour and employer organisations and NGOs on the other. This forum should strike a clearly defined and reasonable balance between these three member groups. It should meet at least twice a year and give its members the opportunity to publicly discuss social issues and problems.

• **Ensure governments' responses to complaints by social partners:** it is important to oblige governments to take action in response to officially submitted notifications of their social partners. This should become an obligatory mechanism, which provides recognised labour and employer organisations as well as NGOs on both sides of a FTA with the opportunity to submit such calls for action. Such complaints should be dealt with within a determined period of time (e.g. two months); they should also be part of a permanent follow-up and review process to ensure that governments are effectively dealing with complaints.

• **Independent experts shall assess complaints and develop recommendations:** if the response of a party to complaints by the other government is not satisfactory, these complaints should be assessed by independent and qualified experts. Relevant recommendations by experts must be part of a determined speedy process to ensure that assessments are not only used for reports and recommendations but also lead to provisions on follow-up and review procedures. The purpose of this is to keep the pressure on governments to prevent employees' rights to be violated on their territories. At least one independent expert should be an ILO representative.

• **The dispute resolution procedure must also be applied to the Sustainability Chapter:** it should be clarified that the same implementation provisions apply to the Chapter on Sustainable Development as for all other regulations of the Agreement. Hence, the provisions of this chapter are therefore in particular subject to the same dispute settlement treatment as all other elements of the Agreement.

• **Preventing continuous violation of minimum labour standards by fines:** in case that during the consultation procedures between governments and social partners as well as non-governmental organisations and following the recommendations of independent experts no positive changes have been made within a reasonable period, imposing fines has to be an option of the dispute resolution procedure. These should be large enough to have a deterrent effect. The revenue of these fines should be used to improve the social standard

and the working conditions in those sectors and areas, where the relevant problems occur. In this context, technical and administrative support in co-operating with international organisations, in particular the ILO, to remedy any shortcomings has to be provided for.

• **Ensuring compliance with the Environmental Agreement:** in order to justify the name given to this Sustainable Development Chapter, it is essential to implement strong clauses on the compliance with multilateral environmental agreements, including the Kyoto Protocol. In accordance with the Generalized System of Preferences of the EU (GPS+), its environmental agreements have to be ratified and implemented. This concerns the following agreements: Montreal Protocol (Ozone Depleting Substances), Basel Convention (Hazardous Wastes), Stockholm Convention (Persistent Organic Pollutants), Convention on International Trade in Endangered Species of Wild Fauna and Flora, Convention on Biological Diversity, Rotterdam Convention (Hazardous Chemicals and Pesticides).

• A Sustainability Chapter with relevant agreement on the protection of **Human Rights** (in particular the access to International Covenant on Economic, Social and Cultural Rights of the UN) should also be tied to the Agreement.

Should you have any further questions please do not hesitate to contact

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