



UK-India trade consultation response

Consultation: <https://www.gov.uk/government/consultations/trade-with-india-call-for-input>

Deadline: 31 August 2021

Please describe the purpose and nature of your organisation (membership, representative organisation, etc).

The Trade Justice Movement (TJM) is a UK-wide network of sixty civil society organisations, with millions of individual members, calling for trade rules that work for people and the planet. Our members include trade unions, NGOs, consumer groups and faith organisations. Together we are calling for trade justice, where the global system of trade ensures sustainable outcomes for ordinary people and the environment.

Which of these areas of a free trade agreement best describe your organisation's priorities?

- Sanitary and phytosanitary measures
- Digital
- Government procurement
- Intellectual property
- International development
- Investment
- Labour standards
- Gender equality / women's economic empowerment
- Environment and climate change
- Other: human rights

Based on the priority areas you have outlined above, what would your organisation want the UK government to achieve through a free trade agreement (or related trade talks) with India, and why? (10,000 characters / about 1500 words)

This question is poorly framed as it fails to recognise that many organisations might reasonably have doubts about the benefits of a UK-India FTA. The slow and repeatedly stalled negotiation process between the EU and India demonstrates that both parties may - following appropriate consultation and scoping assessments - question whether such a deal brings sufficient benefits. Later in this submission TJM seeks to contribute to this process by outlining specific concerns about the content of a potential trade deal. In answer to this question, we will focus on the current context for the deal and the process surrounding it.

Democracy and scrutiny

As has been raised by a number of organisations including businesses, trade unions, environmental organisations and other NGOs, the UK's democratic and scrutiny processes are extremely weak compared to other countries, and expose a democratic deficit in an important area of government policy.

Although some verbal reassurances about scrutiny of new trade deals were offered by ministers during the passage of the Trade Act (2021), it remains unclear how a future UK-India FTA would be scrutinised. It is essential that the Government incorporates the following procedural safeguards as it begins negotiations:

- Before negotiations: the Government should present its negotiation objectives to Parliament and give MPs sufficient time to read, debate and vote on them.
- During negotiations: the Government should provide regular updates to MPs and the public, with opportunities for questions, and release the texts from negotiation rounds where appropriate.
- After negotiations: MPs should have a guaranteed debate and vote on the final deal, with the ability to reject it.
- At all stages, there should be public consultation with civil society groups and businesses, to ensure the deal has broad support from a variety of constituencies.

The UK Government should also make a particular effort to understand and address the concerns of civil society organisations in both the UK and India.

Consultation

Although we welcome the Department for International Trade's (DIT) consultation on this deal, we have some concerns about its structure, process and aims. In particular:

- The questions in the consultation are mostly business-oriented. While it is important to hear the views of UK businesses, this should not mean neglecting the input of UK and Indian civil society, which represents a range of interests including those of workers, the environment, development aims, animals and wider society.
- The questions focus on tariffs and trade flows, while there is little focus on the impact of trade on wider issues. In particular, areas including climate change, food standards and animal welfare are noticeably absent or only superficially covered. The rest of our response addresses some of these issues.
- The Department should clarify whether there are any proposals for a civil society forum as part of a future UK-India deal. If so, plans for this should be made public as soon as possible. The Government should outline how civil society organisations can feed into the trade deal; both during negotiations and when the deal is in force.

Impact assessment

DIT has rightly begun conducting 'scoping assessments' for new trade agreements prior to formal negotiations. However these should be complemented with full impact assessments at the point of signature, so that MPs and the public can see the fully expected impact of a trade deal before considering ratification. A pre-negotiation scoping assessment cannot give

a full account of the impact of the deal before it is agreed. Impact assessments should ideally be conducted by a body independent of DIT and appropriate methodology should be employed to take into account a wide range of social and environmental impacts, not just economic impact. In the case of UK-India trade negotiations, impact assessments should as a minimum cover:

- Sustainable development, including impact on other developing economies
- Impact of trade on vulnerable communities, including: women, minority religious or social groups, migrant workers, farmers and poorer communities
- The environment and climate change
- Animal welfare
- Human rights
- Geopolitics and social justice between Global North and Global South countries
- Regional trade (i.e. India's trade with its immediate neighbours)
- Response to the Covid-19 pandemic, including vaccine provision and public health

Context for these negotiations

The UK and India are both undergoing periods of political change. Brexit means that the UK is adopting an independent trade policy for the first time in fifty years, and deliberately prioritising FTAs with new partners. The UK Government's Integrated Review of foreign and defence policy has encouraged a pivot towards the Indo-Pacific region. A UK-India FTA therefore has a substantial geopolitical dimension and should not be understood as a purely economic gesture. The UK Government has also as yet, not clearly articulated its trade strategy, which makes judging the relative merits of any particular FTA challenging.

Meanwhile, India is undergoing its *Atmanirbhar Bharat* campaign, led by Prime Minister Modi's Government, which can broadly be understood as a campaign for self-sufficiency and localism. The campaign has led to various reforms to support local industry and at times restrict foreign competition. At the same time, India has been rocked by farmers' protests this year, following reforms to the collective bargaining system for agricultural produce. These examples indicate that India's economic and trade policy will be driven by domestic politics, and that drastic changes to the system will sometimes be met with strong local opposition.

This context means that launching a UK-India trade agreement at this moment could prove to be poor timing: while the UK's priority is the rapid signature of a large number of FTAs, India is undergoing a more domestic-focused economic campaign.

There are numerous hurdles to a UK-India FTA, as shown by the failed EU-India talks. Many of the issues, explored later in this response, will resurface in UK-India negotiations. Likewise, many of the concerns raised about the EU-India trade deal, related to sustainable development and the impact of the deal on India's domestic economy, also apply to the UK-India context.

Using the same list, please select your organisation's top three priorities for a future free trade agreement (or related trade talks) with India.

- The environment and climate change
- International development
- Labour standards

Using the text box, please explain why these are your top priorities. (10,000 characters / about 1500 words)

The environment and climate change

The UK claims to be a world-leader in the fight against climate change, and was the first major economy to set a carbon-zero target of 2050. This year, the UK will host the COP26 Climate Conference, which hopes to build on the Paris Agreement to set new, ambitious targets for global emissions reduction. In 2019, Prime Minister Boris Johnson pledged that his government would make Britain the “cleanest, greenest country on Earth”, and has announced investment in green technologies, regulations towards decarbonisation and the maintenance of high environmental standards after Brexit.

Despite this, there is a concerning disconnect between the UK’s climate ambition and its new trade policy. DIT has been given free rein to negotiate new FTAs with countries which in many areas have far lower environmental standards than the UK, including India. ‘Rollover’ FTAs with existing partners have not been reformed to account for climate change, and the Government refused to accept amendments to the Trade Bill which would have maintained high standards.

A particular area of concern is Investor-State Dispute Settlement (ISDS), which can have disastrous implications for environmental and climate policy. ISDS allows firms to sue governments for policies which harm their profits. While the aim is to mitigate against unreasonable and unpredictable government behaviour, in practice ISDS has been used to challenge all sorts of important environmental regulations, including: the phase-out of coal-fired power stations, water pollution controls in Germany, a ban on fracking in Canada, and various regulations on mining in East Asia and South America. There is a risk that ISDS is used to challenge new regulations which are essential for fighting climate change.

In particular, foreign investments in certain areas such as mining have come into conflict with not just environmental standards but also local democracy. There are instances of both the local population and environmental activists being targeted and prosecuted in India.

The UK Government has maintained its Bilateral Investment Treaties (BITs) which include ISDS, but has thus far not included it in trade agreements with Japan, Australia and New Zealand. India reviewed its investment treaties in 2016 following a string of legal challenges. The review led to the termination of a number of treaties, including the UK-India BIT in 2017. It is likely that India will want to base investment protection negotiations on its ‘model BIT’ developed during the 2016 review and will be resistant to a wholesale incorporation of ISDS within any new trade agreement. It is important that the UK does not put pressure on India to capitulate in this area, particularly given the implications for climate goals.

Another environmental concern is that trade agreements often encourage a race to the bottom on standards, which severely hampers environmental regulation. This could happen

through multiple avenues: first, trade negotiations could put pressure on the UK to reduce its product standards or allow imports of goods made using practices banned in the UK, as part of seeking a trade agreement. For instance, India's pesticide regulation is far laxer than the UK's. India is the world's second highest user of pesticides after China, and follows a 'risk based' rather than precautionary approach. It has been reported that around eight to ten 20 tonne containers of Indian grown basmati rice are being returned every month due to high pesticide residue levels which don't meet the domestic standard of the importing country. This implies that India stands to gain from lowering UK pesticide standards, in addition to other agricultural and food standards, and might seek to achieve this (for example via a regulatory cooperation chapter or mutual recognition agreement) as part of FTA negotiations.

Second, trade rules at the World Trade Organization make it difficult for countries to ban products on the basis of process and production methods (PPMs), as shown by a number of WTO cases, even if other countries' PPMs are harmful for the environment. For instance, imported goods from India may be produced in carbon-intensive ways which are either banned or uncommon in the UK. Trade deals may make these products even more competitive through the removal of tariffs, potentially putting pressure on UK producers to lower their standards. We are aware that the UK is considering a Carbon Border Adjustment Mechanism (CBAM) to address this kind of carbon leakage (where imported goods do not face the same emissions taxation in production that similar products and processes would in the UK.) Such a measure must be given careful consideration and as yet we believe a number of important questions have not been answered: how would the UK ensure that a border tax would not increase pressure on those actors in the supply chain who are relatively less able to assert their rights (e.g. informal women workers)? How would the UK address the problem of the UK benefiting from a tax on production that it has outsourced to other countries? How would the UK come to a measurement of carbon emissions that was accepted by a sufficient number of partners? A CBAM would make it harder for India to export to the UK, in common with a number of developing countries, and this could impact on FTA negotiations.

Third, trade deals themselves increasingly contain regulatory cooperation chapters, which encourage regulators in each country to discuss, assess and harmonise regulations. Since this cooperation is geared towards increasing trade rather than tackling issues like climate change, there is a risk that it leads to a reduction in standards rather than a shared raising of standards.

In the context of a future UK-India trade agreement, it is essential that climate change is put at the heart of the deal to ensure that it does not conflict with the UK's climate ambitions. Particular attention must be paid to the risk posed by provisions including ISDS, regulatory cooperation, SPS, procurement and emissions resulting from the flow of goods.

Labour standards

It is important that the UK's future trade and investment agreements uphold workers' rights, decent jobs and fair pay, not just in the UK but worldwide. A UK-India FTA could impact on labour rights in several ways. India has ratified six of the eight ILO core Conventions (it has not ratified Convention 87 Freedom of Association and Protection of the Right to Organise

and Convention 98 Right to Organise and Collective Bargaining) and it has a weak recent track record of upholding labour rights. In particular, India has not implemented the convention on harassment and violence at work. In 2020 the ILO expressed deep concern about labour law amendments which weakened the requirement for tripartite consultations.

In the Indian context, it is especially important that any trade agreement promotes equal opportunity for vulnerable and marginalised communities such as Dalits, Muslims, Adivasis and women in hiring and promotion practices. It is essential that the work environment is conducive for people from these groups to work freely without harassment.

A further concern is the impact that trade and services liberalisation could have on workers in both countries. Trade unions around the world have consistently cautioned against trade deals that expose vulnerable sectors to premature competition, or which put pressure on public services either through lost tariff revenue or pressure to liberalise or lock in the privatisation of those sectors. These measures have serious impacts for workers' rights which are often overlooked by traditional impact assessments.

Investment protection provisions could also impact labour rights. There is a limited number of known ISDS cases challenging labour regulations, however, such challenges are possible. For example, when Egypt raised its minimum wage, which had previously been kept unsustainably low by the Mubarak regime, it was sued by French multinational Veolia. Although the government won on this occasion, the case took six years, and whilst the cost to the government was not publicised, it is likely to have been in the region of US\$8 million.

Traditional labour chapters in trade agreements are inadequate in mitigating these risks as they are weakly worded and often very difficult to enforce. To address labour rights concerns in an FTA it is important to have an effective impact assessment and review process, as well as legally binding commitments.

International development is discussed in answer to the next question

Of the three priorities you have selected, which one is the most important and why? (10,000 characters / about 1500 words)

International development

Although India's GDP is roughly the same size as the UK's, its population is over 20 times larger. This means that India's GDP per capita is about the same level as Angola, Bangladesh and Mauritania, countries that are classified as Least Developed Countries (LDCs). However, India's economy has grown significantly over the last few decades and its economic strength has led to debates about whether it should continue to be classified as a developing country, a question which led to the UK withdrawing Official Development Assistance (ODA) from India in 2018 (though it continues to provide aid in other forms).

Undoubtedly India remains a country with high levels of poverty and economic inequality. While the middle class in urban areas has grown, the vast majority of Indians live in rural areas in relative poverty. It is estimated that around 84 million Indians (or 6% of the

population) live in extreme poverty; more than the entire UK population, which makes India the country with the highest absolute number of poor people in the world.

In addition to poverty and inequality, many Indian workers face insecure employment in the informal economy, or employment in agricultural industries which are prone to fluctuating prices, weather conditions and climate change. The lack of a robust legal system means that corruption, child labour, human trafficking and illicit industries also remain a huge problem. Furthermore, the Indian caste system, which has its roots in ancient India but was reinforced by the British colonial era, means that certain demographic groups suffer particular forms of economic and social disadvantages. Women also face specific forms of structural discrimination, as addressed later in the question on gender equality and female empowerment.

These points highlight the need for a future UK-India trade to have sustainable development at its heart. There are a number of particular areas of concern.

1. Agriculture

- UK agricultural produce faces high tariffs from India and these are a target for any trade negotiations. However, if these were to be removed within the FTA, Indian farmers could be undercut by UK produce, further entrenching rural poverty.
- One area of particular concern is the UK's dairy industry, which would like access to the Indian market. India has a well-established national dairy co-operative owned by over three and a half million small dairy farmers. When India previously introduced a lower tariff on dairy imports, this led to European milk powder flooding the market, which damaged domestic producers. India subsequently reinstated the tariff.
- In practice India is likely to defend agriculture as a sensitive industry, the UK must take into account the challenges faced by Indian farmers, dairy producers and others operating in the agricultural sector and tailor its negotiating tactics accordingly.

2. Preference erosion

- A trade deal between the UK and India will have important implications for both countries' trading partners. At present certain Indian products are granted preferential access to the UK market under the General Framework of its trade preferences scheme, but these are not as generous as those offered to countries classed as LDCs.
- If the UK were to reduce tariffs for certain goods from India as part of an FTA, this could negatively affect countries currently benefiting from low or zero tariffs as their margin of preference would be lost or eroded and they would suddenly find themselves in the position of having to compete with India.
- The UK Government should examine this closely as part of its scoping assessment. Likely products of interest will be textiles, clothing and footwear where liberalisation could impact Bangladesh, Cambodia and some countries in Africa and horticulture products including vegetables and cut flowers where India is beginning to ramp up production which could impact Kenya, Tanzania and Ethiopia.

3. Retail

- India has traditionally limited foreign direct investment in the retail sector, and committed to supporting the thousands of small scale family owned shops that dominate retail in the country.
- Recent reforms have relaxed rules for international food retailers selling food manufactured within the country and clothing retailers provided they source thirty percent of their materials locally.
- Coupled with a growing openness to trade deals, these reforms will heighten concern amongst smaller shops and consumers about the potential future dominance of large multinational retailers.
- Such dominance would also have an impact on smaller suppliers, including farmers, weakening their bargaining power through monopsony influence, at a time when farmers have already been hit this year by changes to the traditional collective bargaining boards, leading to huge protests.

4. Financial services and fintech

- Financial services constitute an offensive interest for the UK, given its large financial services sector.
- The Indian Government has a 'priority sector lending' policy which requires domestic banks to lend to national priority sectors, including agriculture, small scale industries and housing. The Reserve Bank of India has started to extend these requirements to foreign banks with very gradual targets.
- Evidence (from Traidcraft) shows that the impact of the introduction of foreign banks to India has been mixed. In particular, while foreign banks are generating higher returns than domestic banks, they generally have a poorer track record of lending to small businesses or socially disadvantaged sectors than either public banks or domestic private banks.
- Both India and the UK have seen rapid growth in the fintech sector in recent years. Improving access to the India market in this area is likely to be a key objective for UK negotiators. It will be important to assess the likely impact of any liberalisation in this on development and financial inclusion in India.

5. Government Procurement

- The Indian government is the single largest procurer of goods and services in the country. Indian public procurement constitutes 30 percent of GDP and is estimated to be worth \$530 trillion according to the Open Contracting Partnership.
- Along with many countries, India uses its public procurement as a tool of social policy, for example setting targets for the percentage of purchase from Small and Medium Enterprises (SMEs) and women-owned businesses.
- As part of the Modi government's Atmanirbhar Bharat strategy a series of recent reforms has strengthened requirements to prefer local suppliers when awarding government contracts in order to support local manufacturing and job creation.
- This will be a hotly contested area in a UK-India trade agreement. India's domestic policies, designed with development goals in mind, could come under pressure from UK businesses seeking better access to this lucrative and hitherto protected market.

6. Digital

- According to McKinsey Global Institute, India is one of the largest and fastest-growing markets for digital consumers, with 560 million internet subscribers in 2018, second only to China.
- The Government of India is spearheading digital adoption through programmes such as 'Digital India' intended to make government services available online and Aadhaar, the largest single biometric digital identity programme in the world, with 1.2 billion records. The Indian Government is also seeking to position the country as a hub for innovation in Artificial Intelligence.
- Although India's rate of digitisation is one of the fastest in the world, it started from a low base, at just 32% digital adoption in 2017.
- India has a significant ICT sector, accounting for around 13% of total GDP, however it lags behind in terms of digital innovation: Bloomberg rank it 50th out of 111 countries.
- India also continues to face issues such as: a lack of digital connectivity in rural areas, patchy digital infrastructure and low levels of digital literacy.
- Given India's ambitions in the digital space, it is likely to seek a relatively liberal approach to the sharing of digital building blocks such as source code and algorithms in order to help boost its digital industries. In contrast, it may seek to limit the export of data associated with online interactions both to support its own industrial strategies and to protect user privacy.
- The recent exponential growth in digital adoption is likely to mean that India, in common with most other countries, is likely to be in the early stages of developing domestic regulation to protect digital rights and privacy, and ensure that digital products are safe. The UK's approach to e-commerce chapters, for example in the UK-Japan deal, could threaten India's ability to ensure regulation keeps pace with growth in the digital sector.
- The UK should adopt a cautious approach to any e-commerce chapter. Countries must be free to ensure that valuable digital resources generated domestically are used in ways that bring benefits to their populations and that they are able to ensure digital rights are protected.
- It is also likely that India will need to address the problem of job displacement, with up to 45 million workers needing to be redeployed. The UK must ensure that any FTA does not prevent India from taking action in this area.

7. Wider human rights concerns

- There are a number of concerns about human rights in India, which are often poorly protected both in law and in practice. It is important that, alongside sustainable development, UK-India diplomacy supports:
 - A more robust protection of freedom of expression and assembly, including: tolerance for diverse opinions, debate, and intellectual freedom. This is important for a well-functioning and transparent political and economic system.
 - Allowing civil society to thrive: it is essential that India champions and empowers civil society, particularly against private sector interests.
 - Rule of law: Increased mob attacks on minorities with little accountability has raised serious concerns over deteriorating rule of law in the country, especially in some parts of northern India.

What would your organisation's concerns about a trade agreement (or related talks) with India be?

- Sanitary and phytosanitary measures
- Digital
- Government procurement
- Intellectual property
- International development
- Investment
- Labour standards
- Gender equality / women's economic empowerment
- Environment and climate change
- Other: human rights

Based on your selection, please explain the concerns your organisation have about a future free trade agreement (or related talks) with India. (10,000 characters / about 1500 words)

Many of our concerns have already been covered in earlier sections of our consultation response, in particular:

- Democracy and scrutiny of the agreement
- Public consultation
- Impact assessment
- Sustainable development impacts, including:
 - Agriculture and food
 - Retail
 - Financial services
 - Public health
- Environment and climate change, including:
 - ISDS
 - Emissions from trade and imports
 - Regulatory cooperation and standards
- Workers' rights
- Gender equality and women's economic empowerment (explored in answer to the next question)

In addition to these concerns, there are a few other issues worth mentioning:

Intellectual property and technology transfer

During EU-India negotiations, the EU put pressure on India to reform its Intellectual Property (IP) regime to protect European firms' patents when operating in India. This was resisted by India and is likely to be a sticking point in UK-India negotiations as well.

India's IP regime has enabled it to develop a large and successful pharmaceutical and health sector, and it is home to the world's largest vaccine manufacturer, including affordable

generic products. An open approach to intellectual property has encouraged innovation and technology transfer, as well as lower medicine prices to the benefit of public health in India and many other countries.

India has suffered one of the highest official death tolls during the Covid-19 pandemic, particularly due to the recent Delta variant, despite its vaccine production capacity. While multiple factors have contributed to this, it is essential that Western countries including the UK make it easier for India to access vaccines and other technology in the fight against Covid-19.

One particular risk is that the UK seeks to go beyond the WTO TRIPS agreement in the trade agreement. This was a concern in the attempted EU-India trade agreement, whereby an insistence on data exclusivity would force Indian generic drug manufacturers to repeat the innovator company's costly and time consuming tests as public authorities would no longer be able to rely on existing test data to approve the generic drug. These measures would enable big pharmaceutical companies to maintain prohibitively high prices on medicines and drastically restrict India's ability to produce and export cheap, generic versions of drugs.

India's approach to IP has also been important in supporting its many small scale farmers. Acceding to the Union for the Protection of New Plant Varieties 1991 (UPOV '91) affords plant breeders a 20-25 year monopoly over seeds that are new, distinct, uniform and stable. Farmers are not allowed to produce, reproduce, sell or exchange seeds of these varieties without the breeder's permission. This system can lock farmers into reliance on monopoly seed companies, and sometimes also use of associated agrochemicals as well. India's refusal to join UPOV '91 was controversial during negotiations with EU as the latter tend to insist on this in their FTA negotiations. It is unclear what the UK's approach to this issue will be, although it is a signatory to the Convention. We would urge the UK not to put pressure on India to sign.

Mode 4 and labour movement

India is likely to push for Mode 4 provisions to make it easier for Indian nationals, particularly health and other professionals, to live, study and work in the UK. The migration and mobility partnership signed between the two parties in May 2021 is a first indication of the importance of this issue.

Increasingly open borders between the UK and India are welcome, and there is strong evidence that free movement of people can lead to economic prosperity as well as the sharing and transfer of knowledge, ideas and capital. However, there are also risks associated with such movement: Mode 4 provisions must not lead to the exploitation of Indian workers coming to the UK, nor to the undercutting or unemployment of those already in the resident labour market, care must also be taken to address potential 'brain drain' whereby India foots the bill for training workers, only for its own services or industries to face staff shortages due to high rates of emigration. It is vital therefore that these impacts are properly assessed and addressed during the FTA negotiation process and that any opening of borders is accompanied by shared commitments to labour standards and avoiding undermining important services and industries.

Are there any provisions that would help ensure women can fully access the benefits of trading opportunities between the UK and India? (10,000 characters / about 1500 words)

According to ActionAid, discrimination against women is widespread in India. Women living in the poorest areas have almost no access to financial services, land and inheritance rights. Domestic violence, rape, harassment, acid attacks and 'honour killings' are frequently reported. Within this overall context, the provisions in FTAs also impact different sections of the population, including men and women, differently due to the social norms, power relations and the different roles played by men and women in society and the economy.

Modern FTAs affect the rights and well-being of women in their diversity of roles as workers, producers, traders, consumers (including of public services) and taxpayers and carers. Traditionally however (as this question exemplifies with its emphasis on 'trading opportunities') the gender impacts of FTAs are assessed only in terms of the jobs or business opportunities they might create. This needs to change.

An FTA between the UK and India could have the following impacts, which need to be better understood:

- Women working in sectors at risk such as dairy could lose their source of income and have relatively less access to opportunities for re-training
- If there is a (locking in of) privatisation of public services - including health services - this will have a disproportionate impact on women who are more likely to find it difficult to pay for services and to take on the burden of any additional care.
- If there are changes to intellectual property provisions which increase the costs of medicines or affect farmers' ability to save and re-use seeds this will disproportionately impact women who will have less ability to cover the costs.
- If banking services in rural areas are negatively impacted by financial services liberalisation, this will impact women who are already poorly served.
- If further retail liberalisation leads to widespread entry of large UK retailers to the detriment of smaller shops, this will impact women as small business owners and as consumers potentially paying higher prices
- If public procurement is liberalised, women-owned businesses could potentially lose existing support.
- Women in other developing countries such as Bangladesh or Ethiopia could be impacted if UK buyers reorient supply chains towards India to take advantage of lower tariffs

This list is indicative. A gender responsive impact assessment process would include early consultation with women's groups in both countries to identify priority concerns and to then employ a range of methodologies (not just economic modelling) to assess further. Critically if an issue is found to have a detrimental impact on women's rights it should be possible to exclude this from the negotiation process.

Gender chapters in trade agreements suffer from similar drawbacks to labour and environmental chapters, lacking enforceability and potentially giving the impression that the issue has been dealt with. They are no substitute for a more comprehensive approach both

during the negotiation process and during ongoing implementation. Similarly, a limited approach focused only on 'how women entrepreneurs can access the benefits of trade' is not sufficient to address the multiple impacts of a trade deal.

Is there anything else that you would want to say about the UK's future trade relationship with India? (10,000 characters / about 1500 words)