

To the DFAT Trade Negotiators - INDIA, HS Code 081190 and ECTA

The Lime Caviar Company Pty Ltd - frozen Australian finger lime pearls / finger lime caviar - ECTA and 39.5% tariff + 5% GST.

HS Code 081190 - frozen fruit.

Please see <https://www.limecaviar.net>

The Lime Caviar Company is the world's only producer of frozen **finger lime caviar** - marketed for export as '**Australian finger lime pearls**'. It is produced by extracting the pearls (vesicles) from inside the skins of fresh finger limes. The relevant IP and 'processing equipment' was developed in-house over a period of five years at significant cost. The Company is HACCP certified and HARPC compliant.

The product - **finger lime caviar** - is 100% natural. It is gourmet food, was awarded the 2017 delicious.Produce Awards Innovation Trophy when in prototype form and was launched to the world market just prior to the start of Covid lock-downs. It has no additives, is gluten-free and allergen-free.

The Company developed finger lime caviar to by-pass the rigid fruit fly barriers that prevent to the commercial export of fresh Australia-grown finger limes to most of the world's gourmet food markets - barriers that do not apply too overseas finger lime growers. Because of its year-round availability and its very long frozen shelf life, finger lime caviar can develop into a significant agri-export and exploit a virtual monopoly is each hemisphere for up to seven months of each year.

The Company currently exports finger lime caviar to many of the world's food sector suppliers e.g. in Denmark, UK, Canada, the USA, U.A.E., Kuwait, Malaysia, Singapore, Thailand, Vietnam, Taiwan, Hong Kong, Japan and New Zealand.

Finger lime caviar is produced from fresh finger limes - ***citrus australasica*** - grown in Queensland (Atherton, Bundaberg, Bellthorpe, Kent's Lagoon, Running Creek) and New South Wales (Rous Mill).

The finger lime is Australia's unique native citrus. Inside its skin are hundreds of juice-full pearls (vesicles) that 'pop' in the mouth with bursts of delicious citrus flavour. Finger lime caviar has myriad culinary and mixologist uses. Finger limes were used by many of Australia's First Peoples as a health protective food and medicinally for some 50,000 years before the citron became popular in about 300BC. They still grow in the wild - only - in and about the sub-tropical rainforest regions of south east Queensland and the northern rivers of New South Wales.

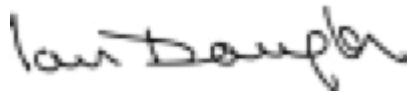
Two market-testing consignments have been sent to India (New Delhi) - the importer being Du Soleil Co.

However, all export possibilities to India have stalled because the product is subject to a tariff of **39.5% + 5% GST**. It was hoped that the ECTA would result in the speedy elimination of this tariff. But appears that this will not be so. I have been advised by Austrade and TIOQ that HS Code 081190 was excluded from the ECTA and as a consequence the tariff has not been eliminated.

Finger lime caviar's HS Code is 081190 - frozen fruit. I request that steps be taken to have **finger liner caviar / Australian finger lime pearls** placed within the scope of the ECTA, thereby leading to the elimination of the tariff. The ECTA is currently of no benefit.

Product specification attached.

Sincerely,

A handwritten signature in black ink that reads "Ian Douglas". The signature is written in a cursive style with a large, prominent initial "I".

Ian Douglas KC (retired)
CEO