



# Export Market Development Grants Independent Review

2026

Timothy Yeend

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# Foreword

Dear Minister,

Thank you for the opportunity to review the Export Market Development Grants (EMDG) program and the support it provides to Australian small and medium enterprises (SMEs). This report addresses the terms of reference and makes recommendations to refine and improve the EMDG program. I have considered the outcomes from stakeholder consultations, available reports, data and research.

The recommended refinements will improve applicant experience and program outcomes. I am mindful that the changes for Round 4 have not yet been fully realised and there is a risk of further, potentially burdensome changes so soon after Round 4. I have therefore focused on addressing the most significant problems to improve the program. I have also looked at opportunities to enhance collaborative work with representative bodies and across federal, state and territory agencies.

The broader economic and trade environment has shaped my findings. In a period of increased global uncertainty, the review of a flagship government program acquires a renewed sense of importance. During my time at the Department of Foreign Affairs and Trade (DFAT) and the World Trade Organization, I saw how changes to global trade have affected the export trajectory of Australian businesses. The EMDG program provides important support to help SMEs adjust and take on new market opportunities.

Throughout the process, I have been impressed by the degree of support for the program from stakeholders. I have received candid yet positive input from businesses, representative bodies, grant agents and individuals who have highlighted how the program sustains SMEs' exports.

I have found that the EMDG program remains relevant, bringing benefits to a wide range of SMEs. It supports marketing and promotional activities, as well as training opportunities that help expand and diversify exports. The benefits of the program are not just monetary. The program helps businesses do more marketing, enables a planning mindset, boosts confidence and encourages ambition and innovation. It also helps businesses to mitigate risk while alleviating financial pressure.

I would like to convey my appreciation for the many people who informed this review. Firstly, the businesses, representative bodies and other stakeholders that shared their experience. I would also like to extend my gratitude to Australian Government agencies and states and territories, who discussed better ways to collaborate. I would also like to recognise the invaluable support of the Secretariat provided to me by Austrade for this review.

I commend this report to you and look forward to the government's response.

Yours sincerely,  
**Timothy Yeend**



**Timothy Yeend**



# Executive summary

The Export Market Development Grants (EMDG) program is of significant value to Australian exporters. This review recommends targeted refinements to increase effectiveness and outcomes

## Introduction

The EMDG program plays an important part in supporting Australian SMEs to enter and expand in export markets. The enduring relevance of the program has been highlighted in previous reviews and improvements – and is reaffirmed in this review.

Following the last independent review in 2020, the Australian Government implemented a significant reform of the program. This included a shift from a reimbursement scheme to a multi-year, upfront grant program with a tiered structure based on an SME's export journey. In 2023–24, the government implemented a refocus of the program to better manage demand and align it more closely with trade diversification priorities.

This independent review, as required by the *Export Market Development Grants Act 1997* ('the Act'), has focused on assessing the efficacy of the most recent changes as implemented in Round 4, covering financial years 2025–26 and 2026–27.

The changes have brought positive benefits to the program's effectiveness. While the timing of this review means some of the Round 4 processes have yet to be completed, there have nevertheless been areas where it is clear the process has not worked optimally. Refinements are proposed to fix issues that will benefit the program. These refinements are targeted and focused so as not to pose any unnecessary additional burden on stakeholders so soon after the Round 4 changes.

The review is framed by an increasingly complex trade landscape. EMDG program objectives relate to the government's priorities to generate new international trade opportunities and deepen the diversity of trade relationships, which bring economic benefits to the Australian economy. As a cornerstone of the Australian economy, SMEs increasingly contribute to trade, and the program helps to address the unique challenges they face. Businesses have indicated that EMDG funding often underpins export marketing and promotional activities that could not otherwise be undertaken.

## Consultations

The review was informed by a wide range of stakeholder feedback from businesses, representative bodies, grant agents and government representatives. The consultation period for the review ran from 15 July to 12 September 2025. Stakeholders attended meetings, completed a survey and made submissions. It was clear that the program is highly valued, but that improvements can be made to the assessment process, program structure, application process, documentation and communications.

## Refinements for EMDG

The changes introduced ahead of Round 4 were designed to forge a stronger link between direct government support for exporters and Australia's broader geoeconomic and strategic resilience.

The program was streamlined to offer larger grant amounts and provide greater funding certainty. These adjustments have helped to deliver greater certainty of grant amounts and larger, more impactful grants, ahead of activities being undertaken that help with global marketing plans. This approach, coupled with clearer criteria and stronger compliance, aimed to ensure that available funding was directed to businesses with the greatest potential to successfully grow and diversify. This in turn was intended to contribute to Australia's longer-term economic and trade strategy.

While the direction of the 2024 changes helped the program to become more targeted and impactful, stakeholder feedback highlighted some concerns with the mechanics and architecture of the Round 4 process. This detracted from the program's overall effectiveness. The most pronounced of these issues was the shift to a first-in first-served approach for grant allocation. While this new system was intended to support the delivery of more certain and more impactful grants, it has risked prioritising speed of submission over the strategic alignment and quality of applicants' proposed export plans. This has resulted in the potential for lower-quality applications to secure funds, undermining the program's goal of supporting high-quality dynamic exporters.

To address this issue, it is recommended the program moves to a merit-based assessment model. Selection criteria would be developed that are aligned to the program's objectives and trade priorities, with funding awarded to the most competitive and meritorious applications against those criteria. This would be coupled with a streamlined 2-tier structure: one focused on promoting and supporting export readiness (the initial market entry phase); and a second comprehensive tier for established exporters to build on new and existing markets. A clear diversification focus can be maintained through the selection criteria for the program.

Several procedural refinements are also suggested to enhance certainty and access, including returning to an annual grant year application process to improve business planning; simplifying some of the documentation requirements for applications; and improving the review process for declined applications to enhance transparency, timeliness and fairness for applicants.

## Representative bodies

Representative bodies play an important role in supporting SMEs to export and they often act as a 'multiplier' that deliver broader impact from government funding across businesses. The program requirements are generally working well for representative bodies. Nevertheless, a move to a merit-based selection process is also recommended to be applied to representative bodies. This will better ensure that representative bodies help meet important program objectives such as on diversification outcomes and increasing engagement and awareness of activities. Recognising that representative bodies can be better utilised to increase diversification efforts, additional grant funding could be offered to those bodies that are accelerating activities in agreed key markets.

## Online application portal

Work undertaken to inform the review by Chalfont Consulting ('Chalfont') confirms that the EMDG online portal is sound, technically strong and resilient enough to manage and deliver the program. Nevertheless, there are tangible amendments that can be made to improve the accessibility and usability of the portal, which would improve the user experience. Considerations of artificial intelligence (AI) to improve efficiencies should also be considered.

## Targeted communications

Communications can be improved to reach out to businesses with export potential, including through targeted engagement and in collaboration with partners. There are also opportunities to communicate the breadth of government export services more effectively, which could in turn help applicants make the most of EMDG. During the application process and assessment period, direct communications with applicants, on a more regular basis, could also improve the overall user experience.

## Whole-of-government alignment

SMEs, which are crucial drivers of economic activity and job creation, have indicated that a more integrated approach to government assistance would support them to achieve increased export growth. A persistent challenge remains the coordination between EMDG and complementary government initiatives. While the EMDG program's value is its direct, matched incentive for international marketing and promotional activities, its efficacy could be further magnified when seamlessly connected to broader support. This support might include advisory services, capital access and support for business innovation.

Better cross-agency and inter-governmental cooperation would reduce complexity and administrative burden and ensure cohesive national export support. Such alignment would help improve the return on public funds by better equipping SMEs to successfully target global markets. As a practical first step, enhanced cooperation with Export Finance Australia (EFA) is suggested.

## Looking further ahead

There is a case for ongoing work to ensure the program's continuing relevance in a changing global environment. Further work to establish an evaluation and monitoring framework to better determine how EMDG supports businesses in the longer term would be valuable. In addition, analysis to determine the role of financial support and how this intersects with other services would underpin future considerations for the program in the longer term. Analysis should also include an examination of the administrative impacts of the legislative instruments. This analytical work would be a valuable undertaking for Austrade and ensure the EMDG program remains both highly valued and demonstrably fit for purpose.

# Summary of recommendations

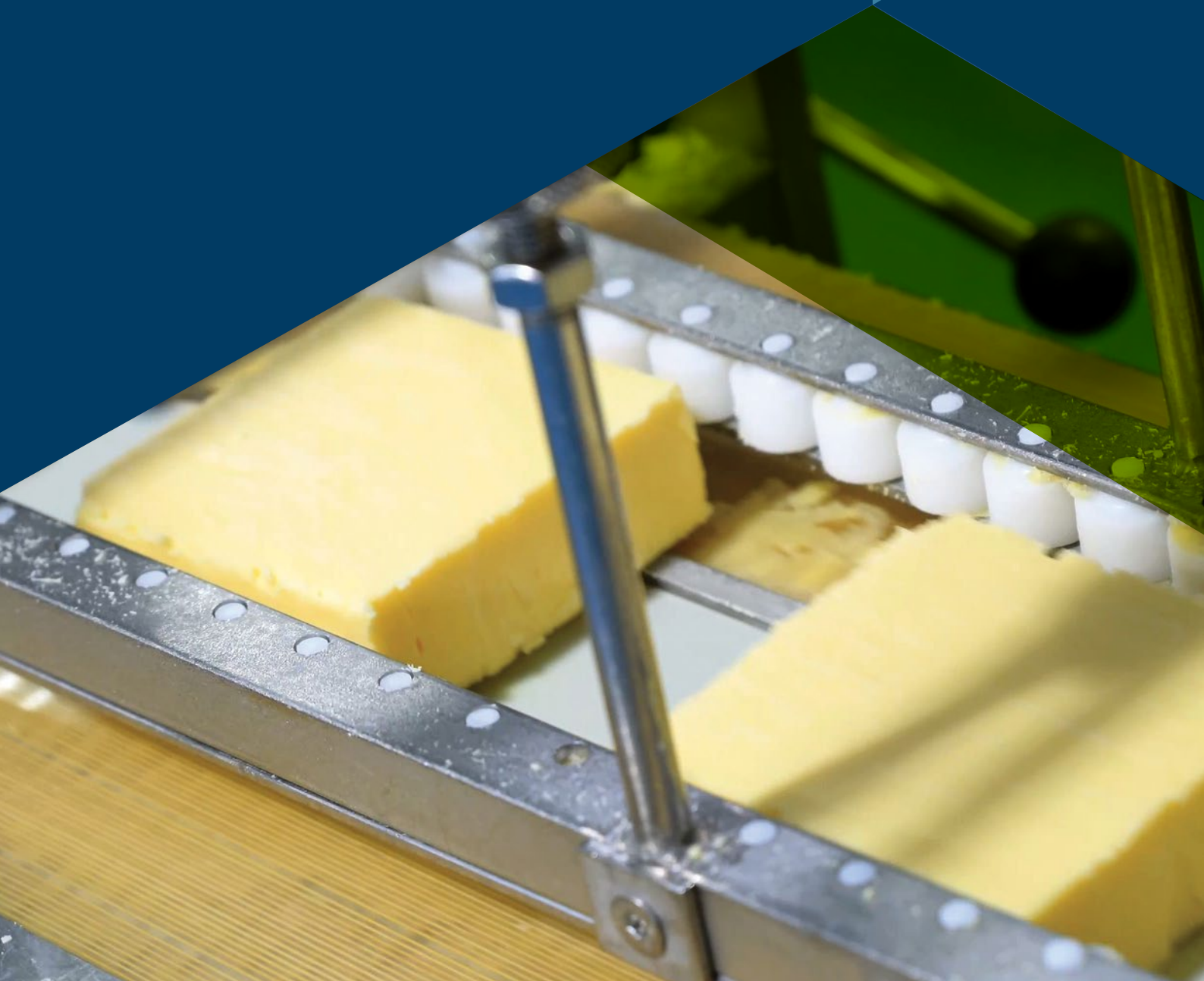
**TABLE 1:**  
Summary of the EMDG Independent Review recommendations

| Refinements for EMDG          |  |
|-------------------------------|--|
| Introducing merit             | <p><b>Recommendation 1:</b> Adopt a merit-based application process aligned to the EMDG program's objectives and trade priorities.</p> <p><b>Recommendation 2:</b> Base the selection process on eligibility and merit criteria, with criteria tied to the quality of the application, business capabilities and the anticipated grant impact.</p>   |
| Program structure             | <p><b>Recommendation 3:</b> Move to a 2-tiered structure for businesses: one focused on businesses that are ready to export; a second on established exporters.</p>  |
| Assessment and review process | <p><b>Recommendation 4:</b> In moving to a merit-based system, streamline assessment processes and minimise complexity to the extent possible.</p> <p><b>Recommendation 5:</b> Improve the internal review (appeal) process focusing on business facilitation, efficiency, and improvements in timing and transparency, so it is fit-for-purpose in a merit-based approach.</p>  |
| Improved access               | <p><b>Recommendation 6:</b> Adopt annual grant rounds, with annual grant agreements, to improve business planning.</p> <p><b>Recommendation 7:</b> Revisit the requirement for a detailed plan to market.</p> <p><b>Recommendation 8:</b> Review the milestone process, including changing the 15 June deadline to ensure grantees have sufficient time to plan and have a full 12 months of eligible expenditure.</p> <p><b>Recommendation 9:</b> Improve explanations and communications about eligible expenditure.</p> <p><b>Recommendation 10:</b> A capped price limit for international air travel should be determined and the per diem travel rates should be reviewed.</p> |
| Representative Bodies         |  |
| Role of representative bodies | <p><b>Recommendation 11:</b> Representative bodies that undertake eligible activities focused on diversification markets should be offered higher matched grant amounts.</p> <p><b>Recommendation 12:</b> Austrade should increase its engagement with representative bodies to better utilise the EMDG program to support strategic trade priorities.</p>   |
| Eligibility and expenses      | <p><b>Recommendation 13:</b> The specific requirement for 'new' marketing and promotional activities for representative bodies can be removed.</p> <p><b>Recommendation 14:</b> The requirement for a turnover limit related to membership of representative bodies should be removed.</p> <p><b>Recommendation 15:</b> Examine how industry contributions are assessed for eligible expenses.</p>   |

| Online application portal   |  |
|---|--|
| Improving accessibility   | <p><b>Recommendation 16:</b> Austrade should implement the practical improvements to the online portal identified by Chalfont Consulting.</p> <p><b>Recommendation 17:</b> Austrade should consider options to utilise AI, subject to risk assessment, feasibility and cost analysis.</p>  |
| Targeted communications and engagement  |  |
| Provide targeted communications   | <p><b>Recommendation 18:</b> Austrade should improve its regular communications, including providing notification when changes are made to the website.</p> <p><b>Recommendation 19:</b> Austrade should directly communicate to applicants about the status of their application during the assessment process.</p>   |
| Engage with stakeholders about the program  | <p><b>Recommendation 20:</b> Austrade should undertake targeted engagement to communicate EMDG opportunities. The audience should include representative bodies, and states and territories.</p> <p><b>Recommendation 21:</b> Austrade should engage with First Nations business chambers and other partners who could benefit from increased awareness of, and participation in, the EMDG program.</p>  |
| Support clients to apply for EMDG   | <p><b>Recommendation 22:</b> Austrade communications should focus on the range of complementary support available.</p> <p><b>Recommendation 23:</b> Austrade can promote the benefits of applying for the program directly, in combination with making the assessment process more accessible.</p>   |
| Whole-of-government alignment   |  |
| Export support and opportunities within Austrade, across the Australian Government, and with states and territories | <p><b>Recommendation 24:</b> Austrade should identify clearer connections between Austrade advisory services, digital tools (Go Global Toolkit) and in-market support to help firms progress their export capability and make more effective use of the EMDG program.</p> <p><b>Recommendation 25:</b> Austrade and states and territories should consider how EMDG activities could be better integrated with co-investment trade services like TradeStart.</p> <p><b>Recommendation 26:</b> Austrade should formalise a pilot partnership with EFA to provide an enhanced suite of export and loan services to SMEs.</p> |
| Resourcing  | <p><b>Recommendation 27:</b> The government should ensure continued sufficient resourcing for the EMDG program to implement these recommendations.</p>   |
| Looking further ahead   |  |
| Evaluation, trade services and legislation  | <p><b>Recommendation 28:</b> Austrade should strengthen the evaluation and monitoring arrangements for EMDG program performance.</p> <p><b>Recommendation 29:</b> Austrade should assess the legislative framework for the EMDG program to determine its impact, effectiveness and practicality.</p>   |

# Introduction

The EMDG program supports Australian businesses to expand and diversify their exports



## The review

The EMDG program assists Australian SMEs to undertake export marketing and promotion.

As outlined in section 3 of the Act, the program provides grants for marketing and promotional activities to SMEs and their representative bodies. The objective is for SMEs to develop skills to market their products internationally. Facilitated by Austrade, the program benefits the Australian economy through the creation, development and expansion of foreign markets for Australian products.

The EMDG program continues to be an important part of Australia's trade architecture, and its continuing relevance has been highlighted through various reviews and improvements. This independent review was initiated in March 2025 by Senator the Hon Don Farrell as required under section 106A of the Act.

The terms of reference for this independent review are included at **Appendix B**. The stated objectives of the review are to:

- Review the quality of current program processes and delivery, with a focus on applicants' experience engaging with Round 4 of the program.
- Identify how Austrade and representative bodies can work together to optimise representative body members' ability to leverage EMDG funded support to achieve export outcomes.

- With a focus on optimising a whole-of-Australian-government approach to support for SME's engaging in international business, identify approaches to better connect EMDG to relevant programs and other support provided by other Australian Government organisations, including states and territories.
- Identify any other matters the reviewer considers are relevant to the effective operation of the program, achievement of value for money, and delivery of trade outcomes.

Out of scope for this review are proposals to amend the Act, appropriation levels or the number of tiers in place for the EMDG program. My recommendations and findings align to the terms of reference. That said, I do make recommendations about the tiered structure, which I believe is an area where improvements can be made in alignment with the Act.

## Context

This independent review follows a period of change for the EMDG program. The last review in 2020 introduced significant reforms, shifting the grant program from a reimbursement scheme to the pre-approval of planned activities and funding. Iterative changes have been made during the first four rounds under the new program and are summarised below with full details in **Appendix C**.

**TABLE 2:****Timeline of program changes from 2020 to 2024**

| Timeline   | Change   |
|--|--|
| 2020 – the last independent review                 | <p>The review proposed that EMDG shift from a reimbursement scheme to an up-front grant program with multi-year grant agreements and targeted grant funding through a tiered program, reflecting stages in the export journey.</p> <p>The recommendations were accepted and implemented through a redesign of the program, the Act, and development of the <i>Export Market Development Grants Rules 2021</i> ('the Rules') and guidelines.</p>  |
| 2021 – the first round of the reformed program     | <p>Round 1 received 5,384 applications, which was around 2,000 more than anticipated. All eligible EMDG applicants were offered a grant. Many stakeholders were critical of average grant amounts (\$23,825) which were significantly lower when compared to the reimbursement scheme.</p>   |
| 2022 – operational review                          | <p>In August 2022 the Minister for Trade and Tourism asked Austrade to undertake an operational review to identify improvements to program design, client experience and communications.</p> <p>The review found there was a need to balance the high level of interest in the program against the fixed budget, to ensure businesses received meaningful grant amounts. A range of options to help manage demand were identified.</p>   |
| 2023 – strategic refocus                           | <p>In February 2023 the Minister asked Austrade to strategically refocus EMDG, to test the options for improvement that would:</p> <ul style="list-style-type: none"> <li>• increase grant amounts</li> <li>• better align the program with trade policy priorities</li> <li>• achieve quality outcomes within the available annual budget.</li> </ul> <p>In late 2023 the Minister approved changes which were endorsed by the Prime Minister in early 2024.</p>  |
| 2024 – changes are introduced for the fourth Round | <p>Changes were introduced ahead of Round 4 with the <i>Export Market Development Grants Amendment Rules 2024</i> ('the amendment Rules') which were tabled in Parliament on 20 March 2024.</p> <p>The changes amended eligibility to support exporters to develop new markets in line with trade diversification priorities, deliver more impactful grants and ensure budget sustainability.</p> <p>Tightened eligibility conditions were introduced for businesses and representative bodies. The changes require that businesses new to export must pass a test and/or training to ensure they are export ready, and all businesses must be tax compliant. A high-quality plan to market is required for all applicants, including representative bodies.</p> <p>The amended Rules provided new eligibility conditions. They enable Austrade's Chief Executive Officer (CEO) to exercise discretion to manage high demand on the program, select quality businesses and target eligibility towards the government's priority markets.</p> |

## Round 4 outcomes

Austrade opened Round 4 of the EMDG program on 6 November 2024 and received 2,693 applications for grants covering the 2025–26 and 2026–27 financial years.

Round 4 opened to applications for:

- Representative bodies at 10am AEDT on 6 November 2024
- Tier 1, Tier 2 and Tier 3 at 10am AEDT on 12 November 2024.

Applications were open until the funding allocation was expended and closed for:

- Tier 2 at 1:30pm AEDT on 12 November 2024, just three and a half hours after opening
- Tier 1, Tier 3 and representative bodies at 5:00pm AEDT on 20 December 2024.

Applications were assessed in chronological order based on their submission time stamp.

**TABLE 3:**

**Profile of Round 4 grantees (as of 19 January 2026)**

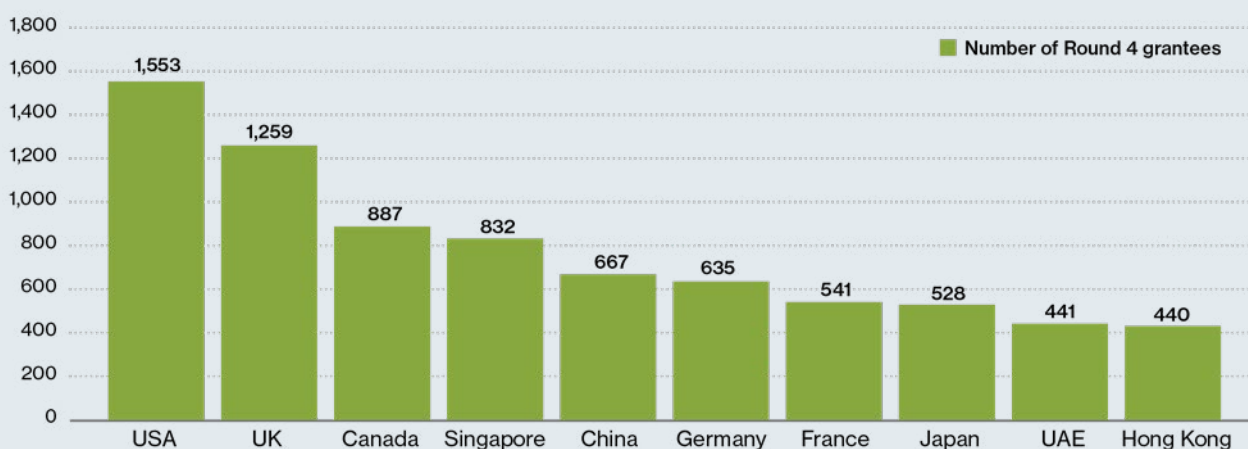
| Timeline                            | Representative body | Tier 1      | Tier 2      | Tier 3       | Total              |
|-------------------------------------|---------------------|-------------|-------------|--------------|--------------------|
| Grantees                            | 110                 | 315         | 1,066       | 739          | <b>2,230</b>       |
| Average turnover size               | N/A                 | \$2,026,149 | \$3,666,863 | \$4,527,0470 | <b>\$3,722,925</b> |
| Average number of employees         | 19                  | 11          | 13          | 16           | <b>14</b>          |
| Average number of years in business | 22                  | 8           | 10          | 11           | <b>11</b>          |
| Average grant amount received       | \$47,279            | \$28,738    | \$48,733    | \$73,499     | <b>\$53,867</b>    |

Round 4 supported grantees across a range of industries, including services and technology, consumer advisory, food and agriculture, advanced manufacturing, education, tourism, international health, infrastructure as well as energy and resources.

The top 10 markets targeted in Round 4 for export marketing and promotional activities were the United States of America, the United Kingdom, Canada, Singapore, China, Germany, France, Japan, United Arab Emirates and Hong Kong.

**GRAPH 1:**

**Top 10 markets targeted by Round 4 grantees**



By 30 June 2025, a total of \$20.7 million was provided to 1,035 low-risk grantees in the form of a \$20,000 initial payment, to support them at the start of the grant year. In Round 4, 53 per cent (1,192) of grantees received an initial payment of \$20,000, totalling \$23.8 million.

More information about the Round 4 data can be found at **Appendix D**.

## Review's objectives

While this review covers the period since the last independent review, it has a particular focus on Round 4 given this is the current program and is still underway.

I am conscious of undertaking a review of the program within this context. The results of the most recent changes have not been fully realised. Even though I am recommending some further refinements, I have been mindful that introducing further changes so soon after Round 4 could pose an undue administrative burden on stakeholders as they navigate the program. I have therefore focused on addressing the most significant problems with the objective of improving program outcomes and the applicant experience.

Evidence for the review has been drawn from stakeholders and a wide range of resources, including:

- **Stakeholder engagement:** Input from businesses, representative bodies, grant agents, and government agencies. Stakeholder feedback was provided through written submissions, a survey, and in-person consultation sessions. See 'Consultations', **Appendix E** and **Appendix F**.
- **Data, research and engagement from Austrade:** Austrade provided data to inform the review and shared insights about decisions and changes. Austrade also shared reports including the operational review, analysis by Swinburne University of Technology, analysis undertaken by the office of Austrade's Chief Economist and program documentation.
- **WhereTo Research:** Behavioural analysis of SME exporters and the role of the EMDG program in their export activities was undertaken by WhereTo Research (WhereTo), including 90 interviews with businesses. See **Appendix G**.
- **Chalfont Consulting:** An assessment of the EMDG delivery system was conducted by Chalfont to evaluate the system's current compliance, functionality and usability against mandatory digital service standards, web content accessibility guidelines and industry best practice. See 'Online application portal' and **Appendix H**.

This review did not undertake an economic impact analysis to determine the return on investment generated by the EMDG program. The timing and nature of the changes that have been made to EMDG did not make it feasible to establish a baseline for the program at this time. This aspect is addressed later in the report as part of future considerations.

## EMDG supports SME export outcomes

The EMDG program aligns with Australian Government priorities, including to generate new trade opportunities to drive Australia's employment and economic growth.

Australian businesses are navigating a complex trade environment, characterised by increased global competition, trends towards trade intervention and the need to enhance economic resilience. Deepening and diversifying trade relationships, forging new bilateral and regional agreements and working with different countries have helped reduce risks associated with reliance on a particular market or product. The government is also prioritising recognition in bilateral, regional and multilateral agendas to promote the unique offerings of First Nations businesses.

In a difficult geopolitical environment, supporting SMEs to expand and grow their export opportunities is crucial to help realise trade benefits. Trade supports economic growth and is a significant driver of employment. In 2024 alone, Australia's two-way trade was equivalent to around 46% of gross domestic product (GDP) while the foreign investment stock in Australia was equivalent to 183% of GDP, according to the Australian Bureau of Statistics (ABS) in 2025. Trade-related activities supported almost 3 million Australian full-time equivalent jobs in 2022–23, or more than one in 4 jobs (DFAT 2024).

SMEs are the backbone of the Australian economy. They constitute more than 99.8% of all Australian businesses and drive substantial economic activity (ABS 2025). SMEs are vital employers. More than 8.5 million people worked in SMEs in 2023–24, which equates to two-thirds of Australia's workforce (ABS 2025).

Economically, SMEs contribute a significant portion to Australia's total GDP. Small businesses alone (0-19 employees) added nearly \$596 billion of value in 2023–24, or one-third of the total (Australian Small Business and Family Enterprise Ombudsman, 2025). SMEs are increasingly important to Australia's international trade performance and export diversification. They make up a large share of businesses engaged in foreign commerce, comprising 95% of exporters in 2022–23 (Austrade 2023).

## SME motivations and how the EMDG program helps

The motivations behind Australian SMEs' export decisions vary between businesses and industries. WhereTo (2025) identified several factors that encourage SMEs to export, including:

- the limited size of some Australian markets
- the relative levels of saturation and competition
- the potential for increased financial returns.

The analysis revealed that the initial stages of exporting and subsequent diversification are primarily pursued as strategies to mitigate business risk. However, SMEs face specific challenges when it comes to commencing export activity.

## SME behavioural responses to exporting challenges

**Filling knowledge gaps.** It can be difficult for SMEs to access relevant market intelligence to inform decisions on market selection, entry methods and risk assessments (i.e. those who lack the resources to pay for market research, consultants or other advice).

**Cultural considerations.** Adapting to language and cultural differences can force reliance on intermediaries to navigate these complexities. Austrade and state and territory government trade services can play a key role for SMEs in this area.

**Developing export capabilities.** Some SMEs adopt a 'trial market' approach to test their export capabilities before expanding further. This can involve putting their supply chain to the test, as well as understanding their ability to adapt to local market needs.

**Access to finance.** Significant costs for market entry and promotion create cash flow challenges, making traditional loans difficult. Self-funding and angel investors are common. EMDG and other government support can prove crucial.

The EMDG program helps SMEs address the challenges of expanding into overseas markets. It facilitates market entry for Australian exporters, complementing government efforts to forge new, resilient supply chain partnerships.

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*'The EMDG Grant is the most effective tool to assist us in market development. It gives us confidence to stretch out further into markets and readily expediate projects by financially supporting our plans.'*

– Business

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The EMDG program is widely viewed as a valuable tool. It enables businesses to meet their export goals and undertake activities they might not have otherwise pursued due to high costs and the risks involved (WhereTo 2025). Businesses say the EMDG program:

- provides a level of confidence to undertake their marketing and promotional activities
- encourages innovation and new behaviours by allowing businesses to take a risk
- encourages them to trial more sophisticated activities to support export success
- alleviates some of the costs of marketing and promotional activities
- establishes a planning mindset, particularly among less-established SMEs
- encompasses a wide range of business types and industries.

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*One of the program's key benefits is that it encourages businesses to plan strategically. The application and milestone structure requires SMEs to outline their export marketing intentions, which often prompts more deliberate market research, clearer budgeting and stronger operational planning. This discipline not only benefits the current export effort but also builds internal capabilities that will continue to serve the business beyond the grant period. In terms of trade outcomes, EMDG has been instrumental in helping SMEs gain international exposure, establish overseas relationships, and secure new distribution channels.*

– Business

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# Consultations

Stakeholders expressed a wide range of views that informed the review findings and recommendations



## Consultation process

Wide-ranging consultations were conducted from 15 July to 12 September 2025 to seek the views of key stakeholders in response to the terms of reference. Stakeholders included businesses, representative bodies, grant agents and state and territory representatives. They provided feedback to the independent review in 3 ways:

- **Submissions:** Providing written submissions via email or the online submission form.
- **Survey:** Completing the online survey.
- **Meetings:** Participating in face-to-face and online consultations.

Consultations were also undertaken with Austrade and other key Australian, state and territory government agencies over the course of the review.

All feedback provided was used to inform the recommendations to refine and improve the program. An overview of the submissions and meetings can be found at **Appendix E**, and a summary of the survey results can be found at **Appendix F**.

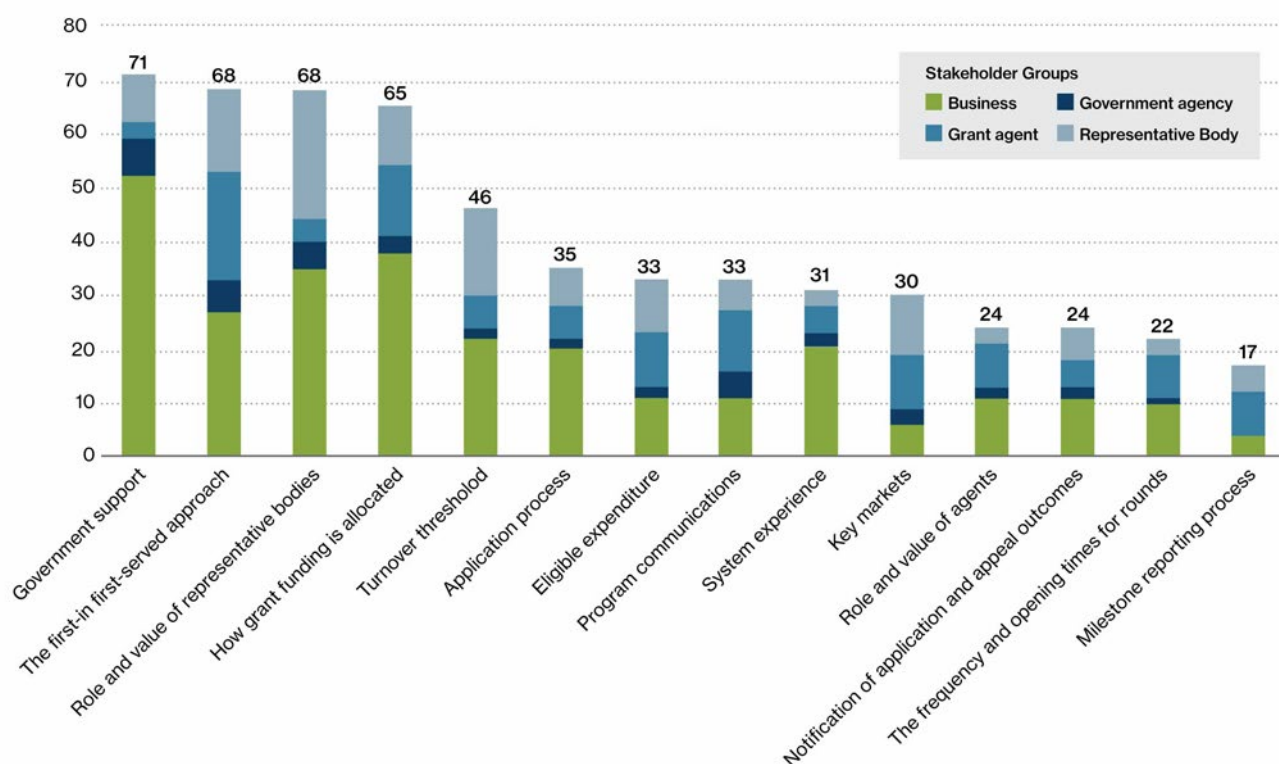
## Stakeholders' priorities

The high-level themes that emerged during the consultation process are outlined below. The recommended refinements to the program reflect stakeholder feedback, which can help improve the user experience and program outcomes. I have taken forward many of the views to inform the recommendations that are set out in the report.

While all views were considered, not all have been adopted. This necessary selectivity reflected the varying nature of the views put forward, which were often at odds with one another. Also, since many of these views were recently considered as part of the strategic refocus process in 2024 the case for further change was less evident. Further explanation is provided at **Appendix A** on matters that have not been taken forward, or where the status quo appears to strike a reasonable balance. This acknowledges the time given by many stakeholders who provided input for my consideration.

### GRAPH 2:

Frequency of main themes raised by stakeholders during consultations



**TABLE 4:**

**Summary of the key themes from consultations**

| Key theme   | Example  |
|---|--|
| <p><b>The EMDG program and other government support is highly valued</b></p> <p>The program is extremely valuable and provides the confidence and means for businesses to undertake export marketing and promotional activities.</p> <p>Many businesses access multiple forms of government support. Of the survey respondents, 33% accessed other government support (Roy Morgan 2025). Businesses highlighted mixed (though largely positive) experiences from their engagement with Austrade and/or the equivalent state and territory agencies.</p> <p>There is a desire for more support from government including through financial, educational and other opportunities, and help to navigate the breadth of support.</p> <p><i>Refer to 'Whole-of-government integration' chapter</i></p>         | <p><i>'The EMDG Grant is the most effective tool to assist us in market development. It gives us confidence to stretch out further into markets and readily expediate projects by financially supporting our plans.'</i></p> <p>– Business</p>   |
| <p><b>The first-in first-served process presented challenges</b></p> <p>While the principle of the first-in first-served approach – to provide certainty of the grant amounts ahead of time – was acknowledged, stakeholders strongly voiced their preference for an alternative application process. Applicants considered a set opening window combined with a merit-based approach to be a more equitable way to allocate the program funding.</p> <p><i>Refer to 'Refinements for EMDG' chapter</i></p>   | <p><i>'I feel it would have been more fair to allow a specific period of time for any and all applications to be submitted, which could then be assessed on merit and circumstances, rather than allocating a set amount of money to whoever got in within the first hour of opening.'</i></p> <p>– Business</p>   |
| <p><b>Representative bodies play an important role</b></p> <p>Not every business has a representative body and some choose not to engage with one. However, those who do engage with an industry body note their importance in helping navigate trade requirements.</p> <p>Representative bodies are well-positioned to support smaller businesses, regional businesses and tourism operators, by providing them with pathways to engage in trade shows and international marketing. They can multiply the support they provide across many members.</p> <p>Representative bodies collaborate with various levels of government. Some have identified potential ways to work more closely with Austrade to deliver improved outcomes for SMEs.</p> <p><i>Refer to 'Representative bodies' chapter</i></p> | <p><i>'Representative bodies bridge... [a] ... gap by providing collective advocacy, specialised knowledge, market intelligence, and opportunities for collaboration that would be difficult for an SME to access independently... They provide tailored advice, training, and mentoring to SMEs, enabling businesses to understand export regulations, cultural considerations, and market-entry strategies.'</i></p> <p>– Business</p> |

| Key theme   | Example  |
|---|--|
| <p><b>Funding allocations for different tiers did not match applicant demand</b></p> <p>Stakeholders highlighted an imbalance of the funding between the tiers in Round 4. Tier 2 experienced the highest demand, and the funding allocation was exhausted within hours of the round opening. On the other hand, Tier 1, Tier 3 and representative bodies allocations remained open for some weeks. This meant some businesses could not apply for Tier 2 in line with their export marketing plan.</p> <p><i>Refer to 'Refinements for EMDG' chapter</i></p>   | <p><i>'The allocation of funds was really uneven last year, which was why our grant tier closed the same day. One of the other grant tiers was open for months, which would indicate the funding was overallocated and under allocated to the tier we applied for.'</i></p> <p>– Business</p>  |
| <p><b>Turnover thresholds are an area of frustration for some businesses</b></p> <p>Some stakeholders highlighted that they fell outside of the turnover thresholds for the program. For some, the minimum turnover was too high. Some also identified issues with the different thresholds for the tiers which does not necessarily allow a business to work through the program. Others thought the program cap of \$20 million was too low.</p> <p><i>Refer to 'Refinements for EMDG' chapter</i></p>  | <p><i>'It seems we fell into a gap for the eligibility criteria, where we were not eligible for Tier 1 as we were already exporting, but did not meet the turnover requirements for our Tier 2 application. It seems confusing why such a gap would exist given we were successful previously.'</i></p> <p>– Business</p>  |
| <p><b>The application process has improved but is still a considerable time commitment</b></p> <p>Some applicants found the Round 4 application process straightforward and simple to complete.</p> <p>Others found it difficult to navigate and time intensive. Nearly 30% of survey respondents found the Round 4 application process to be more confusing than previous rounds (Roy Morgan 2025). The number of documents required and uncertainty about program eligibility were cited as reasons for increased confusion. The survey also highlighted 'simplified application experience and guidelines' as the most strongly supported potential program change (Roy Morgan 2025).</p> <p><i>Refer to 'Online application portal' chapter</i></p> | <p><i>'We are now in our 3rd round of support from EMDG... I find the EMDG application process very straightforward and feel that it has improved over time.'</i></p> <p>– Business</p> <p><i>'In terms of the application process, changes to make the application process less onerous (for example not requiring unrealistic levels of documentation) would allow the grant amounts to remain in proportion to the time and effort involved in the application process.'</i></p> <p>– Representative body</p> |
| <p><b>Eligible expenditure needs to be clear at the time of application and straightforward to justify</b></p> <p>Businesses requested clarification about eligible expenses for digital marketing and the personnel costs of locally engaged employees. The reintroduction of business class airfares as an eligible expense was a frequent recommendation.</p> <p>Representative bodies noted the challenges they face when accounting for expenses for events where their members pay to attend.</p> <p>Eligible expenses should be assessed at the application phase to provide certainty for applicants to undertake the activity and avoid grant repayments.</p> <p><i>Refer to 'Refinements for EMDG' chapter</i></p>                            | <p><i>'Even with agent support, the process involved a significant amount of time and internal effort to identify, categorise and justify eligible expenses. Without a clear indication of how much funding would ultimately be received, it was difficult to factor EMDG into any meaningful budgeting or export planning.'</i></p> <p>– Business</p>   |

| Key theme   | Example   |
|---|---|
| <p><b>Clear, concise and timely communications could help stakeholders apply</b></p> <p>Stakeholders provided useful feedback about communications.</p> <p>Issues identified include:</p> <ul style="list-style-type: none"> <li>the frequency and content of Austrade emails, which are sometimes inconsistent</li> <li>the quality of website content and stakeholders' ability to find the content</li> <li>changes made to the website or guidelines without notification.</li> </ul> <p>Stakeholders suggest that when the guidelines and website change, there should be notification and evidence of when it was 'last updated.'</p> <p>It was also stressed that there is limited promotion or advertisement of EMDG as an available grant for businesses and their representative bodies.</p> <p><i>Refer to 'Targeted communications' chapter</i></p>   | <p><i>'Communication from Austrade has been timely and professional, and the resources provided—such as webinars, FAQs and direct contact—have been extremely helpful in guiding us through the application and reporting stages... Their assistance and responsiveness gave us confidence in the process and made a real difference to our experience.'</i></p> <p>– Business</p> <p><i>'While the website has information, it can be difficult to locate specific details quickly... Updates are sometimes posted without prominent notices, meaning applicants may not be aware of new requirements until they encounter an issue in their application.'</i></p> <p>– Business</p> |
| <p><b>Stakeholders identify technical difficulties with the online portal</b></p> <p>Some stakeholders acknowledged that the EMDG online portal has improved and gained greater efficiencies over time.</p> <p>Other stakeholders identified the following issues:</p> <ul style="list-style-type: none"> <li>the online portal was difficult to navigate</li> <li>sample application forms did not match the online portal</li> <li>multiple verification steps were duplicative</li> <li>the system often timed out, meaning that content was lost and had to be re-inputted</li> <li>uploading documents was difficult.</li> </ul> <p>A series of technical difficulties and errors was identified, related to ANZSIC codes, selection of markets and the expenditure tables.</p> <p>Survey respondents indicate that the most challenging system aspect for applicants was linking their Digital Identity to their business in Relationship Authorisation Manager (RAM) (managed by the Australian Taxation Office ('ATO')) and preparing and uploading all the necessary documents to complete their application (Roy Morgan 2025).</p> <p><i>Refer to 'Online application portal' chapter</i></p> | <p><i>'While the online portal is a good step forward, it can feel unintuitive at times. Navigation between sections is not always seamless, and there are instances where information must be re-entered if the session times out. The login system, particularly the integration with myGovID, can be cumbersome for some users, especially for those managing multiple entities or with team members involved in preparing the application.'</i></p> <p>– Business</p>   |

| Key theme   | Example  |
|---|--|
| <p><b>Not all businesses can target key diversification markets</b></p> <p>While stakeholders acknowledged the importance of the government’s diversification agenda, they expressed concerns about the changes to EMDG that restricted their market choice.</p> <p>With Tier 3 grants available to businesses seeking to diversify their marketing and promotional activities into new key markets, this approach does not always align with the relevant opportunities that businesses have for their product or service.</p> <p style="text-align: right;"><i>Refer to ‘Refinements for EMDG’ chapter</i></p>  | <p><i>‘Tying funding to particular markets under Tier 3 may encourage businesses in certain industries to explore untapped opportunities... However, some sectors do not have such opportunities in those markets’</i></p> <p>– Representative body</p> <p><i>‘The EMDG program can best support recipients by empowering them to identify and pursue the best markets for their business.’</i></p> <p>– Representative body</p> |
| <p><b>Grant agents play a role, but it should be easier for businesses to apply directly</b></p> <p>Applicants decided to rely on a grant agent because they wanted their expertise, found the guidelines and application process complicated, or were worried that they would miss out. Applicants may also lack time or resources, or are unfamiliar with grant processes. Some businesses believed they were required to use an agent to apply.</p> <p>Survey results indicated that total satisfaction with EMDG is higher (59% compared to 44%) among those businesses that used a grant agent (Roy Morgan 2025).</p> <p>Some stakeholders noted an overly high reliance on third parties. Some had spoken to consultants but decided to apply independently rather than pay for the service and noted that others should be encouraged to do the same. Some saw benefits in applying themselves because the process acts as a planning tool and nobody knows their business better.</p> <p style="text-align: right;"><i>Refer to ‘Targeted communications’ chapter</i></p> | <p><i>‘The agent was very helpful and walked me through the process and was available to answer questions when needed.’</i></p> <p>– Business</p> <p><i>‘The process [...] was very smooth but I would have preferred to be able to do the application without a qualified tax agent, as the fees were rather high. So, a lower barrier of entry and accessibility would be great.’</i></p> <p>– Business</p>                    |
| <p><b>The application assessment process and timeframes were drawn out</b></p> <p>Applicants were dissatisfied with the time taken to receive outcomes and the limited communication they received during the assessment process. Respondents to the survey noted that more updates could improve the program and address the communication ‘void’ while they wait on outcomes (Roy Morgan 2025).</p> <p>Reasons for declines – including not being able to open documents – was seen as ‘overly aggressive’, and not in line with business facilitation. The high number of declines triggered application reviews, added time and cost, and diminished the applicant experience.</p> <p style="text-align: right;"><i>Refer to ‘Refinements for EMDG’ chapter</i></p>   | <p><i>‘We submitted an application for Tier 2 in the current EMDG [round]. Our application was submitted in full well before the deadline and we had been looking forward to the support for our export plans this and next financial year. Yet we have received no updates on the progress of our submission and it still sits awaiting progress on the portal.’</i></p> <p>– Business</p>                                      |

| Key theme  | Example   |
|--|---|
| <p><b>Annual rounds are preferred</b></p> <p>The shift to opening the program for applications every 2 years instead of annually was seen as a negative change, particularly by those who missed out in Round 4. This change was perceived as ‘locking businesses out’ of the program, with applicants expressing their desire for a more frequent program cadence.</p> <p><i>Refer to ‘Refinements for EMDG’ chapter</i></p>  | <p><i>‘Missing out in Round 4 means no funding opportunity until Round 5 — a 2-3 year gap that disrupts export momentum and focussed efforts.’</i></p> <p>– Representative body</p>   |
| <p><b>Milestone requirements and timing create administrative burdens for businesses</b></p> <p>The milestone reporting deadline of 15 June, which is before the end of the financial year, creates inefficiencies and places pressure on grantees to make eligible expenses before the end of the 12-month grant activity period. It was noted that grantees would prefer to extend the milestone reporting deadline to July or August.</p> <p><i>Refer to ‘Refinements for EMDG’ chapter</i></p>   | <p><i>‘Round 4 funding does not provide a full 12 months of eligible spending, with milestone reports due 15 June 2026 — before the end of the financial year — reducing the actual period businesses can utilise grant funds for export activity. This shortens project delivery windows and limits the return on investment for planned trade activities.’</i></p> <p>– Representative body</p> |
| <p><b>Elevating First Nations export activities is a key priority</b></p> <p>There are opportunities to further promote EMDG as an available grant to First Nations businesses. Recommendations to facilitate First Nations businesses to access the program included:</p> <ul style="list-style-type: none"> <li>• collaborating with First Nations-led organisations</li> <li>• offering dedicated funding to First Nations businesses</li> <li>• providing additional support to reduce the knowledge gap</li> <li>• holding training session on how to apply</li> <li>• reducing administrative and eligibility barriers.</li> </ul> <p>First Nations businesses typically have limited capital, fewer financial reserves and lower access to external investment.</p> <p><i>Refer to ‘Refinements for EMDG’ chapter</i></p> | <p><i>‘The main barriers for Indigenous Business exports are the knowledge gap, unconscious bias in the banking sector, and ‘first-in family’ businesses that have to start from scratch.’</i></p> <p>– Representative body</p> <p><i>‘Greater promotion of EMDG, especially for First Nations businesses.’</i></p> <p>– Business</p>   |

| Key theme  | Example  |
|--|--|
| <p><b>Some saw the plan to market as a useful tool, but others were critical</b></p> <p>While some stakeholders recognised the value of encouraging planning activities, others noted that forecasting their activities up to 2 years in advance was difficult, particularly in creative industries. Stakeholders questioned the necessity of having a plan to market and requested greater flexibility to deviate from the planned activities that were proposed during the application process. Stakeholders with a grant noted they were limited in their ability to pivot and target emerging opportunities that were not originally included in their plan to market.</p> <p><i>Refer to 'Refinements for EMDG' chapter</i></p> | <p><i>'One of the program's key benefits is that it encourages businesses to plan strategically. The application and milestone structure requires SMEs to outline their export marketing intentions, which often prompts more deliberate market research, clearer budgeting and stronger operational planning.'</i></p> <p>– Business</p> <p><i>'Having more discretion to make minor adjustments to the export plan based on market conditions would be helpful...'</i></p> <p>– Business</p> |
| <p><b>Engagement could be strengthened</b></p> <p>EMDG stakeholders value proactive engagement before, during and after grant rounds, and appreciate opportunities to be made aware of any future program changes.</p> <p><i>Refer to 'Refinements for EMDG' chapter</i></p>   | <p><i>'Increase consultation with industry between rounds per annum rather than every 5 years'</i></p> <p>– Representative body</p>  |

# Refinements for EMDG

Refinements are recommended to better target the program, increase impact and improve applicant experience



The changes introduced to the program ahead of Round 4 have helped to deliver greater certainty of grant amounts and larger, more impactful grants. This has resulted in the average grant amount in Round 4 being approximately \$54,000. This is a significant increase from the average grant amount of approximately \$24,000 in Rounds 1-3. The larger grant amounts offered to eligible applicants have better supported global marketing plans.

Clearer criteria and stronger compliance requirements were introduced to ensure that available funding was directed to businesses with the greatest potential to successfully grow and diversify their exports. This in turn would support Australia's longer-term economic and trade strategy.

An element of Austrade CEO discretion was also introduced. The goal was to provide flexibility for program settings to be adjusted between rounds to target the program to best effect.

The aim of these changes was to forge a stronger link between direct government support for exporters and Australia's broader geoeconomic and strategic resilience. This included a focus on encouraging businesses to diversify markets, which is an important trade priority.

These changes have improved the program. However, further refinements are warranted to address concerns with the mechanics and architecture of those Round 4 processes that have detracted from the program's overall effectiveness.

### Concerns with first-in first-served

The most significant issue raised by stakeholders regarding the Round 4 process was the change to a first-in first-served approach to award grants.

Under this approach, applications closed when funding was judged to be fully allocated for each of the tiers and representative bodies. A higher level of applications was accepted as a buffer, noting however that not all applications would receive funding. Applications were assessed for eligibility in the order they were received. While this demand-driven or first-in first-served approach aligns with the Commonwealth Grant Rules and Principles (CGRPs) 2024, it has not been well received by the majority of stakeholders.

Stakeholders indicated that the process placed stress on applicants to submit their applications rapidly before any cut off point. It prioritised speed over quality and disadvantaged some smaller businesses who had fewer resources with which to apply. It also undermined the goal of supporting high quality, dynamic exporters which are more aligned with the program and broader trade objectives.

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*The "first in, best dressed" model is neither fair nor transparent. Tier 2 applications were exhausted within [hours] of opening. It has been an arbitrary process that has ignored merit, eligibility and past grant performance.*

— Business

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Similarly, funding for Tier 2 (exporting within existing markets) was exhausted within hours meaning that some businesses could not apply for their preferred tier. The grant funding allocation for Tier 2 was insufficient to meet demand for that tier, while the program remained opened to other tiers until applications closed on 20 December 2024.

The number of grant opportunities available across tiers was designed to allow balance, between:

- grants to support new businesses to enter markets
- grants to support existing businesses to expand and diversify.

Some of the businesses which could not apply for Tier 2 when the applications closed chose to submit applications in other tiers. This undermined the objective to encourage exporters to take a planned strategic approach. Instead, applicants opted to base their application on funding availability and their ability to meet the eligibility requirements.

Despite communication from Austrade that the program would remain open until the funding was fully allocated for each tier, the first-in first-served approach created undue pressure for applicants and Austrade. It also created uncertainty about funding and application outcomes.

## Introduction of a merit-based approach

Adopting a merit-based selection process would be the best way to rectify the problems of the first-in first-served approach. The process would involve an application period (with open and closure dates), followed by the assessment of all applications to test their eligibility and relative merit against selection criteria.

Merit-based selection can achieve better outcomes aligned to the government's strategic priorities. It can also achieve greater value for money by allocating funding based on:

- the capabilities of the applicant's business
- the applicant's export preparedness
- the potential benefits generated through the funding of the applicant's proposed activities.

Evaluating and scoring applications against clearly defined criteria would strengthen the rigour, equity and accountability of the decision-making process, as well as program impact.

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*'I believe this approach [first-in first-served] has severely undermined the purpose of the EMDG program and has been a frustrating experience for many businesses like mine. It is essential that future rounds of this program are managed with greater transparency and fairness. A process that considers a company's history with the EMDG program and the merit of their application would be a far more equitable approach.'*

– Business

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Noting that the EMDG program has never been based on a merit-selection process, the introduction of a competitive approach represents a significant change. Previous iterations of the program have operated on the basis that all eligible applicants will receive funding within available allocations, although some applicants for Round 4 missed out because applications closed for Tier 2.

Under a merit-based process, grants will be allocated on a competitive basis. Successful applications will need to demonstrate eligibility as well as merit. Uncompetitive applications will score lower.

As with other government merit-based grant programs with limited funding but high demand, this will most likely lead to a significant number of applications not

being funded. A merit-based approach will, however, rectify the defect whereby high-quality applicants were unsuccessful simply because they did not submit their application with sufficient speed.

To ensure fairness for applicants, the process will require:

- clear eligibility requirements
- a robust merit-assessment framework
- an appropriate review process.

These must be compatible with ensuring effective and timely delivery of the EMDG program.

Among other things, Division 7 of the Act provides for the review of any decisions by Austrade to not enter into grant agreements. It will be important that any review processes adopted are fit for purpose for a merit-based system. Merit-based programs typically do not allow the merit assessment (as distinct from the eligibility assessment) to be appealed. It may be judged necessary to consider amendments to Division 7 to ensure that the review provisions of the Act are fit for purpose for a merit-based system, and allow for effective implementation.

While a merit-based system is likely to increase administrative requirements (including the time and resources necessary to undertake sound merit evaluations), these should be manageable, provided that the overall process is streamlined as far as possible. Opportunities for streamlining and efficiencies will be addressed in the following sections. Nevertheless, careful consideration will be needed to ensure design of a fit-for-purpose program that is proportionate to the size of grant funding, the level of risk and resourcing.

### Eligibility criteria

Under the proposed approach, applicants will need to meet eligibility criteria. For Round 4, key eligibility conditions were introduced setting minimum thresholds for the program. These are in addition to other criteria, including the need for a high-quality plan to market, tax compliance and the ability to meet probity measures. Eligibility conditions included:

- a minimum business turnover (\$100,000 for Tier 1; \$500,000 for Tier 2; \$1 million for Tier 3)
- a record of operating under the same ABN for a minimum of 2 years
- the capacity to spend at least \$20,000 of the applicant's own money on marketing and promotional activities.

These criteria have added rigour and ensured that businesses accessing the program are more likely to implement their proposed activities. While this drew commentary from some stakeholders, the reasoning behind the eligibility criteria appears sound.

Comparable eligibility and threshold values should therefore be applied for the next round.

### Selection criteria will be used to assess merit

Selection criteria would work in combination with the EMDG program's eligibility conditions to determine grantees. A range of variables could help inform a merit-based assessment of EMDG applicants, including:

- operational and management capabilities
- an understanding of market demand
- the potential for export growth

- diversification outcomes
- the anticipated impact of the grant.

Selection criteria would be applied to businesses and representative bodies. This would assess value for money, and ensure the grant has its intended impact. The assessment process would ensure that grants are directed towards businesses and representative bodies that are well placed to utilise program funding. They would be built around factors to be developed by Austrade, including export readiness, the market opportunity and the expected grant impact (see below).

## Selection criteria: export readiness and capability

- **Operational capability to deliver the proposed grant activity.** This includes whether the applicant's eligible product or service is ready for export, whether they have supply capacity, and if they have appropriate quality assurance systems and certifications.
- **Management capability and risk management.** This includes the ability to successfully implement the marketing activity. Metrics include appropriately skilled personnel and relevant qualifications, leadership capacity, the proposed allocation of time and resources, relevant international market experience and/or due diligence undertaken to understand and mitigate key risks associated with the applicant's target export markets.
- **Financial viability and the capacity to match the requested grant.** This must be supported by evidence of sound financial performance.

## Selection criteria: market opportunity and pathway

- **Understanding of market demand, customer needs and regulatory requirements.** This would be specific to target export markets.
- **Credible, evidence-based, rationale for selecting the applicant's target export markets.** This includes sector-appropriate pathways to reach foreign buyers, evidence of market research, and active engagement with potential buyers.
- **Competitive differentiation** and market positioning that supports export success.

## Selection criteria: expected impact of the activity and grant, export growth and diversification outcomes

- **Anticipated growth in export revenue and/or employment,** including the expected scale and timing of anticipated outcomes.
- **Entry into new export markets and/or expansion within existing markets,** including through new eligible products, services, technologies or market channels.
- **Reduced reliance on a single customer or market.** This will support government objectives of increased export resilience and diversified export outcomes.

**RECOMMENDATION 1:** Adopt a merit-based application process aligned to the EMDG program's objectives and trade priorities.

**RECOMMENDATION 2:** Base the selection process on eligibility and merit criteria, with criteria tied to the quality of the application, business capabilities and the anticipated grant impact.



## Program structure – move to 2 tiers for businesses

The EMDG program is currently structured around 3 business tiers, plus an additional tier for representative bodies (see ‘Representative bodies’ chapter). The intention is to support businesses at strategic points in their export journey, including when they are:

- ready to export (Tier 1)
- expanding marketing activities to consolidate growth within an existing market (Tier 2)
- expanding marketing activities to new markets to aid diversification (Tier 3).

Notwithstanding the rationale for the 3-tiered structure, the distinction between Tier 2 and Tier 3 has created difficulties for businesses. Businesses have had to differentiate between activities focused on either existing or new markets and then apply to one particular tier. In practice businesses often operate

in existing markets while they are also exploring new markets. This also creates complexity for Austrade, because assessors must distinguish between activities and reconcile activities that are eligible for payment.

The intention of the 3 tiers was to reflect the export journey and to encourage businesses to utilise the program at key strategic points. However, many businesses appear to apply based on whether they meet the eligibility criteria for a specific tier, rather than on whether their exports have reached a specific phase, or anticipated outcomes. Despite the importance of encouraging diversification efforts, this criteria has been limited to Tier 3 under current settings. This may mean that grant funding is not supporting diversification efforts as optimally as it could.

To address these problems, the structure of the program for businesses should be based on a new 2-tier model (see below).

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*The demarcation between Tier 2 and Tier 3 has always been artificial and in contradiction with the principles of the program. It is not even imposed by legislation. Some applicants in Tier 2 may have the interest and opportunity to try a new market. Some in Tier 3 may have the need to consolidate in existing markets as well. This distinction has simply constrained the way businesses have been able to operate: “businesses should be allowed to get on with it”. You only need two tiers, exporting and not exporting.*

– Grant agent

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### Export-ready businesses

*Focused on the initial market entry phase*

This tier would be for businesses that have not previously exported and are ready to export eligible products. It would focus on the initial market-entry phase.

Businesses could access up to 2 years of grant funding to help them establish an initial market. Smaller grant amounts would be offered, for example up to \$30,000.

To be eligible, applicants would need to complete export readiness activities, meet eligibility requirements, and address the merit selection criteria.

### Established or growing export businesses

*Focused on building exports in new and existing markets*

This tier would be for businesses that are exporting eligible products and are focused on building exports in new and existing markets.

Businesses could access up to 8 years of grant funding overall. Larger grants would be available under this tier, for example ranging from \$20,000 to \$80,000.

To be eligible, applicants would need to meet eligibility requirements and address the merit selection criteria.

A 2-tier system would reduce complexity for applicants and Austrade. Eligibility for the EMDG program would then be based on exporter characteristics, needs and outcomes, rather than a prescribed tier. Eligibility requirements and the increased ability to assess applicants based on selection criteria would have an additional benefit: it would help in the selection of businesses that should continue in the program, based on factors like export growth and alignment to the program objectives.

Austrade should consider the differing needs of businesses when it comes to defining the tiers, eligibility settings and determining grant amounts, including business size and activity. Sector-specific implications should be explored. For example, tourism stakeholders and those from the creative industries indicated that some of the program settings do not work well for businesses in their sectors. For some businesses, a smaller grant may work better. Austrade should consider how different grant amounts might therefore be offered based on differing business needs.

### Incentivising diversification

Round 4 introduced a stronger focus on encouraging businesses to seek opportunities in new key markets. Tier 3 funding applications targeted promotional activities in one or more of 27 nominated priority markets that were new to applicant businesses. Diversification should remain a continued and important focus for the program as it can improve business resilience and growth, and support Australia's economic prosperity.

As noted above, however, having a specific tier for diversification may not be the optimal approach. Diversification should be considered across the EMDG program. The move to a merit-based selection process would help to better identify and assess those businesses that are proposing activities that will have genuine diversification outcomes and benefits. The proposed selection criteria should aim to assess the intended market outcomes and diversity of markets, thereby incentivising applicants that are planning to work in priority markets. Businesses with genuine diversification goals are therefore more likely to score highly against the criteria.



**RECOMMENDATION 3:** Move to a 2-tiered structure for businesses: one focused on businesses that are ready to export; a second on established exporters.

## Assessment and review process

The assessment process for Round 4 commenced in November 2024, with 2,693 applications received, covering the 2025–26 and 2026–27 financial years. Grant offers to eligible applicants were made starting from late January 2025. By 30 June 2025, Austrade had assessed most applications (89%) and executed 1,717 grant agreements. By 5 September 2025, Austrade had assessed all remaining applications and advised remaining eligible applicants about a grant offer. All eligible applicants have been offered a grant for at least one year.

For some applicants, the Round 4 assessment process was satisfactory, and they were able to receive their assessment outcome within months. Others were dissatisfied by the length of time it took for their application to be assessed. They expressed frustration at having to wait for an extended period.

*'Uncertainty and delays: The assessment process has been overly aggressive, leading to significant delays and appeals. It is now months into the new financial year, and applicants still do not have a clear answer as to whether they will be funded.'*

– Business

*'The EMDG application process, with changes to how the application is submitted, the lack of feedback and poor communication between Austrade and businesses, and still with no certainty or clarity has left us now in both a difficult and frustrating position.'*

– Business

Austrade should review its end-to-end assessment process and implement further approaches to conduct the overall assessment processing period as expeditiously as possible. Opportunities to reduce assessment timeframes include streamlining processes that are proportionate to the applicant's risk profile and the size of the grant. Artificial intelligence may also provide some efficiencies.

### Basis for declining applications and triggering the review process

The rationale for declining applications – which led to a significant number of internal reviews and appeals – added significant delays to the Round 4 assessment period. For Round 4, 1,130 applications (or 42% of the total 2,693) were initially deemed ineligible. This is a significant number.

Austrade advised this was largely a result of the shift to the first-in first-served model. To ensure procedural fairness, a decision was taken that assessors could not contact the applicant during the assessment process. As a result, many applications were deemed incomplete and therefore ineligible. Applicants could then request an internal review of Austrade's decision to allow them to provide additional information, but this lengthened the process considerably.

Austrade confirmed the top 5 reasons for ineligibility were:

- bank statements not outlining minimum capacity to spend (285)
- inadequate evidence to demonstrate tax compliance (232)
- the application did not provide evidence of export invoices (228)
- financial statements were not provided, or were provided for incorrect financial years (104)
- assessors were unable to open attachments (77).

Of the 1,130 applications that were initially deemed ineligible, 812 applicants sought an internal review of the assessment decision. Of those, 720 applications were deemed eligible upon review, 92 had their original ineligible decision upheld. This high turnaround from ineligible to eligible pointed to some inefficiencies in the application system.

Stakeholders expressed concern about the impact of being deemed ineligible. Some expressed 'shock'.

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*'Our initial application was rejected and the reasoning seemed unfounded. While the appeal was upheld and we were awarded the grant, the interim rejection caused us a bit of consternation.'*

– Business

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*'We were also subject to appeals of eligibility which felt like a waste of time from an administrative perspective, especially as it was a 'judgement call' issue and we were then easily deemed eligible after just a few email exchanges. It seems there was [sic] aggressive 'knock backs' of eligibility due to the lack of funding and lack of transparency in the hope that businesses would go away.'*

– Business

They observed that the process seemed 'aggressive' in terms of simple, remediable matters such as an incorrect attachment or a document not opening. This had a negative impact on stakeholders, potentially diminishing Austrade and the program's reputation.

The assessment approach had a negative impact on the perception of the program and does not align with Austrade's overall objective to facilitate businesses. Stakeholders were critical of the limited contact that Austrade had with applicants during the assessment period, particularly for errors related to documents. This limited contact had negative impacts on businesses by unnecessarily drawing out the application process, which commenced in November 2024 and was not completed until September 2025.

The introduction of a merit-based program will have implications for the current assessment approach. In making adjustments, Austrade should be mindful of the concerns that have been expressed. At the same time, stakeholder expectations will need to be managed. There will need to be careful consideration and appropriate communication of the merit-based assessment approach, and conditions for a review process will be needed. A revised review approach should include reasonable contact with applicants when assessing eligibility, which allows them a short period of time (e.g. up to 14 business days) to correct errors in the first instance, before an application is declined.



**RECOMMENDATION 4:** In moving to a merit-based system, streamline assessment processes and minimise complexity to the extent possible.

**RECOMMENDATION 5:** Improve the internal review (appeal) process focusing on business facilitation, efficiency, and improvements in timing and transparency, so it is fit-for-purpose in a merit-based approach.

## Improve access

### Annual grant rounds

Round 4 covers 2 years, with grants allocated for the 2025–26 and 2026–27 grant years. Prior to this, rounds always opened annually. The 2-year period means that many businesses have been offered 2-year grant agreements where they were eligible and funds were available. The rationale for this change was to allow multi-year grant agreements and to help manage the annual budget appropriation for the EMDG program.

There was concern from many stakeholders, however, that the 2-year period between applications did not align with business practices that are geared to yearly cycles. For businesses that do not apply, or are unsuccessful, a 2-year wait for the next round was also seen as being too long. Stakeholders also raised the issue that business may find it difficult to plan for a full, 2-year period, and there can be large discrepancies between planned and actual activities reported at the milestone phase.

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*'Missing out in Round 4 means no funding opportunity until Round 5 – a 2-3 year gap that disrupts export momentum and focussed efforts'*

– Representative body

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For some businesses this has been beneficial. They do not have to apply annually and have certainty for the grant agreement period.

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*'Our team [...] has had a great run with EMDG Round 4. The multi-year funding setup means we can plan big export plays—demo machines, distributor training, new multilingual screens—without the usual stop-start cash squeeze.'*

– Business

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A return to annual rounds is recommended. This will ensure better access to the program as well as alignment to typical business-planning processes. In line with this, annual grant agreements would be offered. This would align to the annual appropriation process and avoid issues seen in rounds 1, 2 and 3 leading to overlapping funding to support multi-year grant agreements. While the return to annual grant rounds will add to the administrative effort and costs, some of the other benefits and efficiencies suggested in this review will help ameliorate the administrative burdens.

### Documentation requirements

A merit-based selection process creates opportunities to streamline some of the evidentiary requirements. It is proposed to move to a more flexible model that would be supported by declarations and targeted risk-based assurance in line with the program's legislative requirements. Consolidation of some application questions and mandatory attachments into the application form and merit criteria may lessen some of the complexity and improve the overall user experience.

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*'The fact that you have export consultants helping to fill in the application forms suggests that it's all a bit too complex and inaccessible for most businesses. I think the application process and portal arrangements could be simplified.'*

– Representative body

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### Plan to market

Businesses and representative bodies currently are required to submit a 'plan to market' detailing their proposed export promotion activities. Representative bodies that are undertaking training activities are similarly required to submit training plans. For Round 4, the requirements for the plan to market were updated to require a high-quality plan and included additional questions, requesting details about proposed activities. Optional questions were included, which sought information about businesses' broader export plans.

There were mixed views on these changes. Some stakeholders considered the plan to market was a valuable business planning tool. Others found it onerous and rigid, limiting the ability for businesses to react flexibly to opportunities to change markets mid-stream. The additional requirement for a plan that needs to be unique, high-quality and specific to the business or representative body was seen as an additional burden – particularly for small operators.

The concept of the plan to market is sound and can encourage business planning. The shift to a merit-based process could nevertheless help with a simplification of requirements as the selection criteria will capture a lot of the information required from applicants. The selection criteria may replace the need for a plan to market to avoid any duplication.

### Milestone reports

While milestone reporting for Round 4 has yet to be finalised, several potential problems were pointed out by stakeholders and should be kept in mind.

Stakeholders indicated that more information would be required, making reporting more complex. Some businesses anticipated there would be less flexibility to change their plans over the course of the grant period. The need to reconcile and provide milestone reports by 15 June was also raised as a concern. Stakeholders considered the timing to be at odds with normal business practice to require reporting before the end of the grant year.

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*'Round 4 funding does not provide a full 12 months of eligible spending, with milestone reports due 15 June 2026 — before the end of the financial year — reducing the actual period businesses can utilise grant funds for export activity. This shortens project delivery windows and limits the return on investment for planned trade activities.'*

– Representative Body

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*'We proceeded with our annual Sydney conference for members on the assumption that expenditures would be covered by Austrade and having already received the funds. The determination that we were not eligible to claim came after we had received the funds and then committed them to the event.'*

– Representative Body

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Austrade confirmed that the main change for milestone reports for Round 4 is that reports are to be lodged within the grant activity period by 15 June 2026 and 15 June 2027 for the respective financial years. For Rounds 1–3, milestone reports could be lodged after the grant activity period.

While the process has yet to occur, the rationale for moving the milestone date to the 15 June is not convincing. Austrade should review this, with a view to ensuring that grantees have a full 12 months of eligible expenditure.

#### **Evidence required**

Austrade should be clear about the evidence required both in the application process and the milestone process.

Some information – such as the requirement to provide bank statements – caused confusion, and it was not clear that this established a business' capacity to spend. There were some examples of businesses that consolidated funds into one account for the purpose of showing they could meet the program requirements. It was suggested that the capacity to spend could instead be assessed via cash flow, based on profit and loss statements.

#### **Eligible expenses**

Some stakeholders provided examples where their activities had been assessed as eligible at the assessment phase but were subsequently deemed ineligible at the milestone phase. They expressed that it was difficult to factor the EMDG funding into meaningful budgeting or planning when they were unsure if an expense would be eligible. Austrade should improve explanations and communications about eligible and ineligible expenditure to increase clarity for applicants and recipients.

Stakeholders indicated that some eligible expense requirements were difficult to reconcile. For example, the requirements for air travel did not always align with business practices, like the need to be able to hit the ground running at trade shows or make last-minute adjustments to travel plans.

Austrade should therefore consider treatment of travel expenditure. One approach could be to introduce upper capped limits for international flights determined on a regional basis (for example, Europe, North America, Asia, etc). This would give businesses a certain amount of discretion to fit in with their business needs while maintaining the necessary financial oversight.

Additionally, the per diem allowance of \$350 should be reviewed, considering that it has not been increased since 2017. The current amount may be too low to allow grantees to cover the travel expenses associated with meals, accommodation, ground transport and incidentals in some markets.



**RECOMMENDATION 6: Adopt annual grant rounds, with annual grant agreements, to improve business planning.**

**RECOMMENDATION 7: Revisit the requirement for a detailed plan to market.**

**RECOMMENDATION 8: Review the milestone process, including changing the 15 June deadline to ensure grantees have sufficient time to plan and have a full 12 months of eligible expenditure.**

**RECOMMENDATION 9: Improve explanations and communications about eligible expenditure.**

**RECOMMENDATION 10: A capped price limit for international air travel should be determined and the per diem travel rates should be reviewed.**

# Representative bodies

Representative bodies play an important role helping SMEs to export. Some adjustments could further improve impact



## The role and value of representative bodies

To be eligible under the EMDG program, a representative body must be a not-for-profit organisation with an export focus, and membership representing a substantial proportion of its industry. Representative bodies support the interests of their members through offering export training and facilitating export marketing and promotion activities. These bodies have an industry or sector base (such as manufacturing, agriculture, tourism or technology) and act as peak bodies, representing members at the national, state, regional or local level.

Representative bodies are positive about the support they receive from the EMDG program and the benefits it brings to their industry and members.

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*'Representative bodies — industry associations, clusters, chambers and peak councils — are a force multiplier for first-time and scaling exporters. Because they aggregate dozens or even hundreds of SMEs under one banner, they lower the 'noise to signal' ratio in foreign markets, negotiate better rates for trade show pavilions, and share hard-won intel on regulations, logistics and cultural norms that a single SME would struggle to gather alone. Members also trust them: advice delivered by a respected association carries more weight than a generic webinar, and the network effect (peer stories, supplier referrals, co-marketing) turns isolated firms into an export-ready ecosystem.'*

– Business

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Stakeholders identified that representative bodies are well positioned to:

- support regional exporters and smaller SMEs by aggregating and amplifying their export marketing efforts
- deliver cost-effective, in-market activities that no single SME could achieve independently
- facilitate intra-industry and external networking, business matching, industry connections and referrals
- coordinate collective advice and responses to unexpected market changes (e.g. tariff changes, freight disruptions)
- provide targeted exporter training to support market-readiness and export capability.

Representative bodies also help smaller businesses

and can be highly effective in industries that are predominantly comprised of small businesses, such as tourism and the creative industries.

## Focus on outcomes delivered by representative bodies

### Moving towards merit-selection

The EMDG program supports a broad range of representative bodies across industries, sectors and regions.

There are representative bodies that have a clear export remit, with a significant reach to members that are highly export focused. Some representative bodies say they could deliver more activities if higher levels of funding were available. However, other representative bodies have not fully utilised the grant amounts they have been offered. The value that SMEs derive from representative bodies may also be based on the types of support and export expertise they provide.

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*'Austrade could consider introducing clearer frameworks and expectations for representative bodies receiving funding. These should focus on practical outcomes and ensure that support is aligned with the needs of exporters across a variety of industries. There is also an opportunity to gather feedback from SMEs to identify which representative bodies are genuinely delivering value and which are not. While representative bodies may play an important role for some businesses, they have not added value to our export efforts. More targeted and sector-specific support, with greater visibility around which organisations are making an impact, would be far more beneficial.'*

– Business

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In line with the recommendations from the 'Refinements to EMDG' chapter, the introduction of merit-based selection criteria should help Austrade better assess potential outcomes that can be delivered by representative bodies.

### Focus on diversification outcomes

Representative bodies could be utilised to better focus on diversification efforts. To incentivise diversification, additional grant funding could be provided to those representative bodies that are able to undertake marketing and promotional activities that focus on specific key markets identified for

the program in a grant year. Representative bodies would have the option to apply for regular funding (for example up to \$50,000) or for additional funding to support key market activities where they have capability and capacity (for example up to \$100,000). They would need to match the grant funding. Markets could be identified based on government priorities, including recent free trade agreements (FTAs), and would be determined ahead of each annual round.

### Engagement with Austrade

Increased collaboration between representative bodies and Austrade could amplify utilisation of EMDG program funding. Austrade has been working closely with many representative bodies to achieve diversification outcomes. Building on this, some representative bodies would welcome increased collaboration, including with trade missions and increased information sharing.

There are some good examples of how Austrade has driven engagement with key representative bodies to better utilise the EMDG program, in line with strategic trade priorities. For the first time in Round 4, 3 First Nations representative bodies received grants to support their members. This fills a gap, as previously no First Nations representative bodies had applied for the program. Austrade should build on this – for example the Accessing New Markets Initiative (see below) – and continue to consider ways to engage representative bodies to better utilise EMDG funding and achieve greater export outcomes.

### The Accessing New Markets Initiative and the Trade Diversification Network

The Accessing New Markets Initiative (ANMI) is a \$50 million program. It helps Australian businesses to diversify into new export markets and capitalise on growth opportunities in established markets. ANMI is designed and jointly delivered by Austrade and industry.

To deliver the ANMI, a new Trade Diversification Network has been set up. The network consists of 40 national peak industry bodies – representing Australian exporters.

Working together with national peak bodies, it builds on and leverages the combined capabilities and experience of industry and government in a unified national effort to support trade diversification.

The initiative provides an example of an enhanced collaboration model with representative bodies for consideration in future EMDG programs.

### Encourage visibility of funding outcomes for businesses

While representative bodies were viewed positively, some businesses do not engage with them or have limited exposure to how they could potentially support their business to export. WhereTo (2025), pointed out that some businesses ‘indicated their industry body did not provide useful information or support in relation to exporting, instead they were more focused on the domestic market.’ Other businesses were dissatisfied with the levels and standards of communication from their representative body or thought that the support provided was not fit for purpose.

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*In our experience, representative bodies have played little to no role in supporting our export activities. As a small, self-directed exporter, we've largely had to navigate international markets, compliance, and branding without any practical assistance from industry associations, trade councils, or chambers of commerce. While these bodies may offer value to some businesses – particularly larger organisations or those in tightly networked industries – their services often feel generalised, passive, or geared toward more established exporters.*

– Business

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In these cases, businesses indicated they would value increased visibility of the assistance offered by their EMDG funded representative bodies. This would enable them to better understand and utilise export training, marketing and promotion opportunities for their industry. Representative bodies should be encouraged to better communicate how they use EMDG grant funding to provide training, marketing and promotion to benefit their members. This outreach should be a consideration in Austrade's evaluation of the effectiveness of export outcomes linked to representative bodies.



**RECOMMENDATION 11:** Representative bodies that undertake eligible activities focused on diversification markets should be offered higher matched grant amounts.

**RECOMMENDATION 12:** Austrade should increase its engagement with representative bodies to better utilise the EMDG program to support strategic trade priorities.

## Eligibility and expenses

### 'New' export marketing and promotional activities

Round 4 introduced a new requirement for representative bodies to demonstrate how their proposed marketing and promotional activities would be 'new'. A key reason for introducing the concept of 'new' activities was that EMDG funding for representative bodies is not subject to a yearly limit.

The 'new' activities concept was put in place to minimise the risk of representative bodies potentially using EMDG funds for business-as-usual activities over long periods of time, without tailoring assistance to SME needs or the shifting global environment.

Austrade assessed this flexibly, accepting that 'new' could include factors such as different marketing plans, a focus on new markets or support for new SME members. This was never intended to preclude attendance at recurring events. Participation at annual trade shows may provide an opportunity for new promotional material, new networking opportunities or clients, or new stalls or offerings, for example. However, some representative bodies nevertheless expressed concern that the "new" requirement led to confusion.

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*'There is a clause that indicates that representative bodies can't focus on 'business as usual'. To be eligible for the EMDG, representative bodies need to plan and deliver something different. But the nature of international business is continuity and consistency. It is critical that in a competitive sector you are always showing up, always there. If you go to a trade show, you always go there. This innovation model does not make a lot of sense. It is counterintuitive that the government invested so much in diversification and is not supporting us to consolidate. In recent years, we went into Vietnam and China, that's where we need to go again.'*

– Representative body

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Introducing merit-based selection criteria (see chapter 'Refinements to EMDG') could allow Austrade to assess the intended outcomes for activities being undertaken by representative bodies. Both new and recurring events would be assessed against the relevant criteria. More innovative approaches could then be assessed more highly. The specific requirement for new marketing and promotional activities for representative bodies could then be removed.

### Support for different sized members

In Round 4, representative bodies needed to establish how their proposed activities benefited their SME members. The definition of SME members adopted for Round 4 was a business with a financial turnover of less than \$20 million per year. This is in line with how business eligibility is defined for the program. This interpretation is closely aligned with the Act.

A number of representative bodies expressed uncertainty about how they can differentiate their support among members and how this may be reconciled by Austrade. During stakeholder consultations, one industry body expressed disappointment that despite being a previous EMDG recipient over many years, they were no longer able to apply because their members had annual turnovers greater than \$20 million per annum.

While the turnover requirement has its benefits for businesses, it is too rigid to apply in the context of representative bodies. This is because of the breadth of businesses that they support and the potential benefits that supporting businesses more widely can have. Coupled with the administrative burden of reconciling activities, it is recommended that a turnover requirement is not applied to representative body activities.

### Third party contributions

Stakeholders raised issues related to marketing and promotional expenses that were deemed ineligible if the representative body had received a contribution from a member for an event.

In at least one instance, an event was approved at the time of application then deemed ineligible at the milestone phase, after the event had occurred.

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*‘This misalignment restricts the effectiveness of association-led outcomes, limits the leveraging of industry funding, and constrains smaller exporters’ ability to participate in collective initiatives. Aligning EMDG rules with industry funding structures would enable stronger export outcomes and broader access.’*

– South Australian Government

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Representative bodies often rely on ticketing, sponsorships, or co-contributions to increase participant buy-in. Current program requirements create unintended consequences for how these international events are delivered. To better reflect the realities of industry promotional activity, Austrade should review this provision and consider relaxing third-party contribution limitations.



**RECOMMENDATION 13:** The specific requirement for ‘new’ marketing and promotional activities for representative bodies can be removed.

**RECOMMENDATION 14:** The requirement for a turnover limit related to membership of representative bodies should be removed.

**RECOMMENDATION 15:** Examine how industry contributions are assessed for eligible expenses.

# Online application portal

The online application experience can be improved to lift program accessibility



Austrade utilises the EMDG online portal ('the portal') to manage the program from end to end.

It provides a single entry point for users to apply, review progress, access historical information, accept grant agreements and submit milestone reports. The EMDG portal uses the Australian Government Digital Identity System myID to verify users. Austrade has undertaken continuous work to improve the portal's operation and function. This includes upgrades, load performance testing, useability testing and automations to respond to feedback. The improvement over time was noted by some stakeholders.

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*'The portal has also improved dramatically. The time we spent putting the portal information together has reduced, which was needed.'*

– Business

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An assessment undertaken to support the findings of this review confirmed that the online portal is robust. Chalfont (2025) found that the online portal 'is generally assessed as technically strong, well-supported, stable, and resilient enough to manage the current grants program lifecycle.' While there may be future opportunities to increase flexibility for front-end activities, on balance, the online portal is fit for purpose and consistent with other government grant programs.

Prior to opening Round 4, Austrade conducted load testing. This confirmed the portal could handle 20,000 applications per day without error at 10,000 applications per hour. Austrade also resolved issues with the portal infrastructure (scaling, queue management, monitoring, and database optimisation) so it could handle anticipated traffic with stable performance.

Austrade confirmed that there were no portal outages during the application process for Round 4, but some stakeholders raised concerns about the performance of the portal. The portal handled the volume of applications. Where there were problems, such as with internet coverage and connectivity, Austrade said that it was able to address them. Some applicants had their pre-drafted applications removed from the portal

before the round opened. Austrade communicated to this group that the drafts would be removed to ensure that all applicants were starting from the same position on the day and time that the round opened.

### Opportunities to improve accessibility and functionality

Stakeholders raised issues related to how the application form is completed.

- Several stakeholders indicated that the log-in process was difficult and time consuming, and took several attempts.
- Stakeholders also reported that verification was complex, duplicative and required too many steps.
- The survey responses indicate that the most challenging aspect for applicants is linking their Digital Identity to their business in Relationship Authorisation Manager (RAM) (managed by the ATO), and preparing and uploading all the necessary documents to complete their application.

Some stakeholders highlighted that the overall design of the portal is difficult to navigate. They said they struggled to find the information they needed to complete their application.

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*'While the online portal is a good step forward, it can feel unintuitive at times. Navigation between sections is not always seamless, and there are instances where information must be re-entered if the session times out... A "save draft and continue later" function that works reliably across devices would improve usability, along with a better status tracker showing exactly where the application is in the review process.'*

– Business

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Stakeholders also highlighted that the session timed out, froze, and/or the saving function did not work in a reliable way. Some indicated these problems meant their information was not saved and needed to be re-inputted.

There seemed to be frustration when uploading documents. Some stakeholders also indicated that it would be beneficial to have clearer information about the documents that needed to be uploaded.

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*'We had several issues on the day with the portal: it froze twice, resulting in me having to restart the application. It wouldn't allow me to upload documents without freezing. In the end I had to upload and save each document, refresh and then upload the second document, and so forth. It resulted in additional time and having to repeat uploads.'*

– Business

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Several errors were identified by users that made it difficult to complete the application form. These included:

- drop-down boxes that did not allow applicants to input the required information
- complications when completing expenditure tables
- issues related to ANZSIC codes.

Chalfont (2025) conducted a formal assessment of the online portal against digital standards (Australia's Digital Service Standards and Web Content Accessibility Guidelines). They also considered stakeholder feedback and examined past reports from previous testing. This led to Chalfont (2025) identifying practical steps that Austrade could consider to improve processes, functionality and accessibility. These steps would improve applicant experience.

Practical improvements include:

- making it clearer for users to identify and correct errors
- enhancing the autosave feature
- simplifying document uploads
- improving user navigation across the portal.

Potential improvements also include exploring opportunities to adopt AI technologies to gain efficiencies with the assessment process. Austrade should consider and prioritise enhancements to the overall functionality and usability of the portal to improve the user experience. A summary of the report prepared by Chalfont outlining the opportunities for improvements is at **Appendix H**.

### Using AI to create efficiencies

Austrade is considering how AI might be utilised to support the application and assessment process, gain efficiencies in the internal workflow, and improve service delivery. Chalfont (2025) confirmed that the system architecture could support the integration of AI. Adopting automated approaches – where feasible and cost effective – could support efficiencies and operational gains.

Chalfont (2025) identified opportunities for AI technologies to be utilised for automated document analysis and the risk-scoring of applications. AI could also be used to generate summaries and to verify data provided in applications. This would save administrative time, and allow staff to focus on more complex application cases. Other manual processes that could be automated include:

- assigning applications to assessors and approvers
- notifying applicants and Austrade staff that a round has closed.



**RECOMMENDATION 16:** Austrade should implement the practical improvements to the online portal identified by Chalfont Consulting.

**RECOMMENDATION 17:** Austrade should consider options to utilise AI, subject to risk assessment, feasibility and cost analysis.

# Targeted communications

## Enhancing strategic communications can improve program targeted engagement

Austrade undertook sustained communication activities to support the implementation of Round 4. Information was provided in a range of formats to meet different audience needs and to communicate key elements of the program. This included:

- **The Austrade website:** with a new layout, the website contained information outlining changes, guidelines, how to apply and Round 4 outcomes.
- **Webinars:** 8 public webinars were held and recorded to explain the Round 4 eligibility criteria, and the application process for Tier 1, Tier 2, Tier 3 and representative bodies.
- **Videos:** 15 explanatory videos were uploaded to the Austrade YouTube channel about Round 4 eligibility, and to help applicants prepare to apply.
- **EMDG Update newsletters:** newsletters were sent to EMDG subscribers to communicate Round 4 changes, guidelines and to promote webinars and explanatory videos. Newsletters also provided information about the application process, the status of applications and grant funding allocations, and progress in making assessments.
- **EMDG Help Desk:** Austrade personnel responded to enquiries and provided support.
- **Go Global Toolkit:** news articles were published to promote public webinars on Round 4 changes and eligibility.
- **The EMDG online portal:** updates to the home page were made to reflect the availability of funding during the application period and status of applications.

Many stakeholders noted significant improvements in terms of communications, systems and staff support compared to previous rounds.

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*'The application process and communication have improved dramatically. The portal has also improved dramatically. The time we spent putting the portal information together has reduced, which was needed. Phone support people are knowledgeable, and it was easy to get answers to our questions.'*

— Business

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Notwithstanding these improvements, there is scope for Austrade to further enhance communication efforts as part of the changes suggested in this report.

**TABLE 5:**

**Feedback on communications throughout the program phases**

| Program phase   | Feedback   |
|---|--|
| <p><b>Introducing changes ahead of Round 4</b></p> <p>Changes and guidelines were communicated on 13 August 2024 on the Austrade website and GrantConnect.</p> <p>The changes were communicated 3 months in advance of the application period to give prospective applicants time to prepare to apply.</p>                                  | <p>The changes to Round 4 were generally well communicated in a range of ways. The communications over a 3-month period allowed stakeholders to prepare, which was a reasonable approach. However, some stakeholders were not aware of the changes. Of the Roy Morgan survey (2025) respondents, 19% had ‘no awareness at all’ of Round 4 changes prior to starting the application process.</p> <p>Some stakeholders noted iterative changes to the website and guidelines in the period prior to applications opening. Austrade confirmed that there were no changes to the guidelines after they were released. Austrade made updates to the website to include points of clarification in response to queries it was receiving. However, stakeholders noted that there were no notifications when updates were made, so unless stakeholders were regularly checking this would have been missed.</p>   |
| <p><b>Application process</b></p> <p>Before Round 4 opened for applications, Austrade provided guidance to encourage applicants to prepare to apply. This included reminders to set up their digital identity, develop their plan-to-market, and prepare relevant documents and attachments.</p>  | <p>The application process – including opening dates – was generally well communicated. Potential applicants were encouraged to prepare for the application, noting the likely high demand.</p> <p>Once the applications opened, Austrade generally managed the volume of inquires adequately. Feedback indicated that Austrade responded well, although during busy periods it may have been difficult to get through.</p> <p>Some stakeholders noted that while information was available, it was sometimes difficult to navigate, including website content and information on the online portal. Others noted inconsistencies between information in emails, the website, and the portal, which delayed some applications.</p> <hr/> <p><i>‘The communication surrounding the EMDG program is, at best, sketchy and unreliable. We frequently receive conflicting information, such as an email in the morning followed by a correction in the afternoon.’</i></p> <p>– Business</p> <hr/> |
| <p><b>Assessment period</b></p> <p>During the assessment process applicants could check the status of their application on the online portal. The status updated as their application progressed through the assessment process. Broad communications about the assessment process and initial payments were also provided by Austrade.</p> | <p>There seemed to be only limited direct communication with applicants who were waiting for their application to be assessed. Austrade confirmed that: ‘Tier 2 applicants that were in the oversubscribed ‘buffer’ group were advised directly of the status of their applications on 11 August and 5 September 2025’, 10 months after they had applied. The drawn-out process created stress for applicants, which was exacerbated by limited communications.</p> <hr/> <p><i>‘We waited over 6 months to be informed that our application had been rejected. During that time, we were preparing to allocate funds and resources based on the expectation of grant support. This outcome has now brought those efforts to a halt and will slow our export momentum over the foreseeable future.’</i></p> <p>– Business</p> <hr/>  |

Opportunities for improvement include undertaking broader promotion to ensure a wider audience is reached, identifying and communicating changes made on the website, and providing clear, concise and consistent information. Checklists to support processes may also help applicants to apply. Austrade should also consider how to better communicate directly with applicants about the status of their applications, particularly when there are delays. A total of 34% of survey respondents (Roy Morgan 2025) noted that more updates on assessment timelines could be a way to improve the program. Monthly communications targeted to applicants could help to reduce the communication 'void' while applicants are awaiting an outcome.

 **RECOMMENDATION 18:** Austrade should improve its regular communications, including providing notification when changes are made to the website.

**RECOMMENDATION 19:** Austrade should directly communicate to applicants about the status of their application during the assessment process.

## Engagement with stakeholders

There are opportunities for Austrade to promote the EMDG program more broadly to attract businesses with export potential. The main form of communication about the EMDG program is through an email subscription list with 22,000 subscribers. Where businesses are not aware or have not opted-in, they may miss notifications and information. Targeted engagement should be undertaken with key stakeholder groups to raise awareness. This includes with First Nations businesses and representative bodies, businesses seeking to diversify, priority sectors, tourism bodies and creative industry bodies. Key partners, including representative bodies and other federal, state and territory agencies can also support outreach to prospective businesses.

Some stakeholders observed that Austrade should share success stories about the achievements of grantees and the impact of the program. This would provide examples about how other business have utilised the program to good effect. Topics should include how businesses leveraged the program, how they applied, and other services they utilised and the benefits.

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*'EMDG remains the most well-known and appreciated government assistance program in Australia. Austrade should consider talking up its achievements and the impact it has had on diversification. Moving forward, there is an opportunity to talk up EMDG as it is an important tool in the context of diversification.'*

– Representative body

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### Engagement with First Nations businesses

Targeted engagement would be especially beneficial to First Nations businesses and representative bodies. Increased promotion of the program would increase understanding of the program and participation.

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*'There was very little promotion of this grant so unless you heard ...[via] ... word of mouth from previous applications, there was little knowledge of its existence for small Aboriginal businesses.'*


– Business

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Stakeholders suggested that providing practical toolkits and resources about EMDG and how it could be used – such as guides and calendars on trade missions and trade shows – could be beneficial for First Nations businesses.

Austrade should engage with Indigenous business chambers and other partners who could benefit from increased awareness of the EMDG program. Austrade should also train them to assist their members in how to apply for EMDG. This would increase representation of First Nations business among EMDG applicants.

There could be a dedicated time each year to help Indigenous businesses to plan for the application process and align to their export strategy. Highlighting success stories of Indigenous businesses using EMDG should also be integrated into the communication outreach.

 **RECOMMENDATION 20:** Austrade should undertake targeted engagement to communicate EMDG opportunities. The audience should include representative bodies, and states and territories.

**RECOMMENDATION 21:** Austrade should engage with First Nations business chambers and other partners who could benefit from increased awareness of, and participation in, the EMDG program.

## Support businesses to apply for EMDG

### Provide information to support businesses as they plan their exports

Communications about the EMDG program should also include information about broader support that could help ensure that applicants are ready to export before they apply. Increased communications about other services provided by Austrade, other federal agencies, and state and territory governments could help businesses to:

- determine what support suits them best
- develop their products
- plan their export activities
- understand markets and market-entry requirements
- utilise complementary support
- make the most of the EMDG program.

The communication strategy should consider opportunities to signpost supplementary or alternative support. This can include when information may be most beneficial, including before rounds open and while recipients are undertaking their promotional activities.

### Make it easier to self-lodge applications

In Round 4, approximately 38% of applications were self-lodged by businesses and representative bodies. A significant proportion of applications were therefore submitted by third parties, such as grant agents, consultants and accountants. Applicants cited the level of program complexity and the desire to rely on technical expertise among the main motivations. Survey results indicated that the grant agents' support generally led to higher levels of satisfaction (59% compared to 44% of those businesses that submitted autonomously). Some applicants said they would have preferred to handle the process independently and would have if it were more accessible. They also said they would have gotten more out of the program if they didn't have to pay for the service of an external party.

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*'The EMDG program is ridiculously complex, to the point where even experienced professionals struggle to navigate it. We employ accountants and consultants to assist with government funding applications, including our R&D tax incentives and successful grants like the Queensland Ignite Ideas initiative. Across the board, these advisors have consistently recommended against pursuing EMDG, citing that the administrative cost far outweighs any potential benefit a small company is likely to receive. It appears the program is geared towards large organisations that possess dedicated teams and do not have the same financial need for the grant.'*

– Business

The Export Chamber of Australia Incorporated whitepaper indicated that increased complexity has resulted in more applicants believing they need to rely on an external party to apply. They agree that this is a cost burden for applicants and can create barriers for entry.

Utilising external assistance is a decision for businesses based on their own circumstances. However, program complexity should not prohibit businesses to apply.

There are benefits for applicants who apply directly, which were identified by some businesses. WhereTo (2025) found that the EMDG application process can influence and encourage export planning, particularly for businesses that are just starting to export. WhereTo (2025) identified that larger more established businesses have more experience and resources to be more structured around planning, and find benefit in completing the application process directly.

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*'The process is fine. I quite like it to be honest because it does force us to kind of sit down and think about ... 'what are we doing next year and the year after that?'...They ask questions like 'what's different from last year?' and to sit there and actually have to think about it is really quite useful.'*

– Business


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*'Anyone who doesn't find it (the application process) useful is ... or lazy. Look you are always learning...so for me it's a process to validate (our plans) and just find out a bit more about ourselves. It's beneficial not to get an agent to do it.'*

– Business

Communications should focus on the positive benefits of applying directly, which could include:

- increased engagement with Austrade, which can signpost other services
- reduced costs for applicants
- improved business export planning.

  
**RECOMMENDATION 22:** Austrade communications should focus on the range of complementary support available.

**RECOMMENDATION 23:** Austrade can promote the benefits of applying for the program directly, in combination with making the assessment process more accessible.

# Whole-of-government alignment

## Better coordination across government will improve exporter outcomes

Government agencies at federal and state levels offer support programs designed to help Australian SMEs grow their businesses, increase productivity and commercialise their products and services. Across governments, specific export support includes grants, export finance, online platforms, tailored export assistance, market information, bilateral/or regional programs, tax exemptions and advisory services. This is in addition to the Australian Government's sustained work to maintain and establish free trade agreements (FTAs) to reduce or eliminate barriers to trade.

Financial cost is one of many factors when exporting, including operational capability, access to market information, market readiness, and legal and regulatory requirements. There are opportunities to uplift the number of EMDG recipients accessing other forms of support.

Of the businesses that completed the survey for this review, 33% of respondents have accessed – or applied for – other government support programs to assist with their export journey. Of those who received or applied for support with exporting, 'Financial Support' was the most common (62%). Trade and Investment Queensland (9%), Creative Australia (4%) and Global Victoria (4%) appeared as some of the key agencies that are utilised by survey participants. Approximately 6% of respondents indicated they had relied on other programs provided by Austrade.

Despite opportunities, stakeholders indicate that it is difficult to navigate across multiple federal and state and territory programs. Each of those programs have different processes, eligibility settings, and sequencing, which can make applications more difficult than intended. EMDG recipients engage with other government programs in different ways and levels of confidence. WhereTo (2025) found there

is a cohort of businesses that is highly motivated to look for – and secure – multiple forms of support. Conversely many others have little awareness of the support available, find it too complex to navigate, or do not have the capacity to apply for grants.

While there is centralised information about government support on [business.gov.au](https://business.gov.au) – including the Go Global Toolkit – more direct signposting might benefit applicants. There is scope to explore alignment between government programs, and how increased coordination and communication could support clearer pathways for exporters.

### Opportunities across government

Stakeholders made several recommendations for increased coordination across federal, state and territory programs and support. These included:

- aligning eligibility criteria and application requirements
- improving data sharing
- creating pipelines with other initiatives
- introducing referrals and 'one-window' systems.

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*'Government bodies should improve cross-agency data sharing so that when an SME engages with one level of government [...] they are automatically referred to relevant federal programs or sector-specific trade initiatives [...] When a business registers for EMDG, they could automatically be offered referrals to other programs'*

– Business

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Within its remit, Austrade can focus on businesses accessing the EMDG program and identify direct opportunities to assist those businesses seeking to apply. This would boost program effectiveness and increase grant utilisation. Such an initiative would draw on Austrade services, other Australian Government programs, and state and territory support. These are outlined below.

### Austrade

Austrade offers a comprehensive range of services. They include export advice, providing in-market connections, and profiling support to help Australian businesses grow their exports. These services are delivered through Austrade's onshore and offshore network. Austrade services are complemented by TradeStart advisers with the states and territories, and digital platforms such as the [Go Global Toolkit](#).

Austrade is also managing several programs on behalf of the Australian Government. This includes regional exchanges, such as the [Australia Southeast Asia Business Exchange](#) and [Australia South Asia Business Exchange](#). It also includes sector-specific programs like [Landing Pads and Dealroom](#), which provide technology companies with temporary co-working spaces and programs to scale-up in key international innovation hubs. The 2-year [ANMI](#) program, will help Australian exporters by building resilience and diversification in Australia's exports.

Evidence from work commissioned by Austrade shows there is a greater export return for businesses receiving both EMDG and other support from Austrade (2020 and 2024 Swinburne University of Technology).

Some stakeholders observed that EMDG could be better integrated, via a 'guided pathway', into the different stages of trade support services:

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*'[There is the] opportunity to integrate EMDG more fully with Austrade's trade-promotion services [...]. SMEs could benefit from a 'guided pathway' where EMDG funding is paired with targeted Austrade advice, introductions to international buyers [...]. This approach would not only increase the effectiveness of individual grants, but also build a coordinated ecosystem of export support.'*

– Business

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Following the recent Round 4 application process, Austrade has taken steps to cross-reference applicants against its existing trade services clients. Austrade also introduces businesses with high export growth potential to additional forms of Austrade support.

Further integration work can be undertaken with Austrade advisory services, digital tools and in-market support. The aim would be to help applicants progress their export capability and make more effective use of the EMDG program. This could include educational outreach to businesses applying for EMDG to take advantage of market information, business export planning advice, and other services available through the Go Global Toolkit. Conversely, eligible businesses that already utilise Austrade's trade services should be encouraged to apply for the EMDG program.

Consultations showed that the TradeStart network could act as 'a multiplier, [if they were] supported and used better as a communication channel for Austrade'. Investment NSW, for instance, observed that TradeStart advisors are often the missing link in communication between SMEs, states and territories, and Austrade. Funded by both Austrade and states and territories, TradeStart advisors often function as the 'single access point' to government assistance for exports. It would be useful if Austrade considered ways to better engage with TradeStart advisors in promoting and supporting EMDG.




### Australian Government

At the federal level, export support includes:

- export finance
- growth funds
- tax offsets programs tailored to specific sectors and needs.

**TABLE 6:**

**Overview of federal programs**

|  |  |
|--|--|
| <p><b>Export finance and growth funds</b></p>                       | <p>Programs offer financial products and services to assist businesses to overcome challenges related to international transactions, such as securing financing for production, managing payment risks, and accessing working capital. These include <u>Export Finance Australia (EFA)</u>, which is Australia’s export credit agency. It provides loans, guarantees, bonds, and other financial solutions. Growth capital, including from the <u>Australian Business Growth Fund</u>, provides long-term, minority equity investments. This fills a gap between bank lending and traditional private equity. The Australian Business Growth Fund works in partnership with major Australian banks.</p>  |
| <p><b>Tax offsets, duty concessions and trade facilitation</b></p>  | <p>The <u>Research and Development Tax Incentive</u> offers a tax offset for companies conducting eligible R&amp;D activities. The <u>Duty Drawback Scheme</u> allows exporters to obtain a refund on customs duty paid on imported goods. <u>Australian Trusted Traders</u> streamlines trade for Australian businesses by reducing red tape at the border and expediting cargo movements.</p>  |
| <p><b>Sector specific programs</b></p>                             | <p>Sector-specific programs also provide grant support in line with government priorities. Examples include:</p> <ul style="list-style-type: none"> <li>• The <u>Defence Industry Development Grants Program</u>, which promotes innovation, skills development and export opportunities within the defence sector</li> <li>• The <u>Future Made in Australia Innovation Fund</u>, which funds pre-commercial innovation to support the net zero transition</li> <li>• <u>Funding for Artificial Intelligence (AI) Centres to help SMEs</u></li> <li>• The <u>Climate-Smart Agriculture Program</u></li> <li>• The <u>Creative Future Fund</u>, which supports large-scale creative projects.</li> </ul> <p>Other programs targeting important priorities include <u>Indigenous Business Australia</u>, which provides a suite of support services to First Nation businesses. This includes business finance and social enterprise grants. These programs are administered by the lead Commonwealth portfolio agency. They ensure financial support is matched with sector-specific expertise and technical advice.</p> |

Austrade can consider future collaboration to improve communications about the different types of support that are available. There may also be opportunities for Austrade to learn from other agencies about how they deliver programs, particularly where stakeholders highlight good approaches.

**Piloting an approach with Export Finance Australia**

Export Finance Australia represents a clear opportunity for further collaboration and a harmonised approach to enhancing services for EMDG clients. I recommend that Austrade work with EFA to identify points of greater collaboration between the 2 agencies.

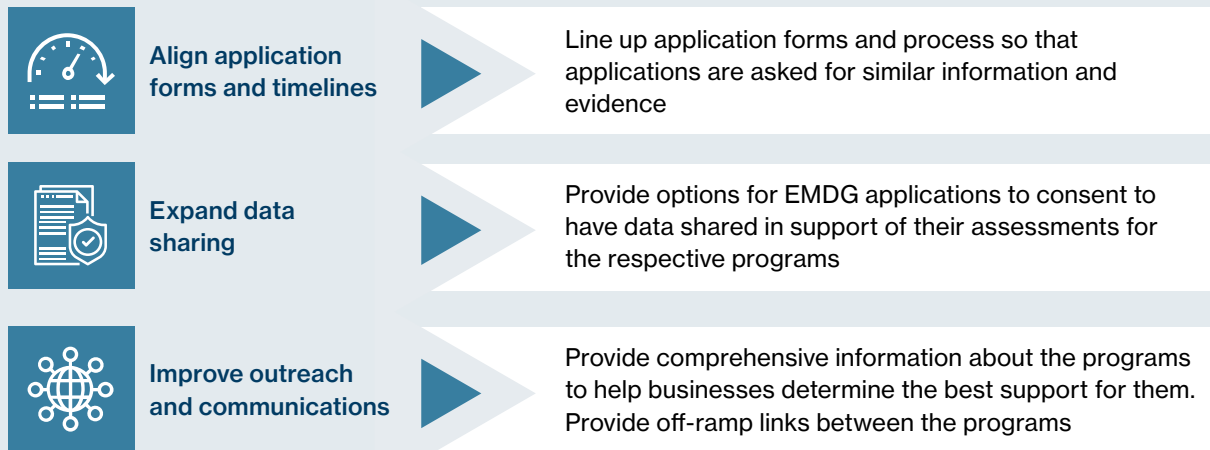
*‘Synergies between EMDG and EFA’s work are considerable and likely to become more significant [...] In general, there is a lot of potential to streamline [the] product and service offering of various players. Applicants are faced with a plethora of tools including tax exemption and concession schemes, as well as grants provided at state level (such as Investment NSW) and there is scope for further harmonisation. Different tools could support applicants at different stages of their journey.’*

– Export Finance Australia

EFA provides loan products to SMEs to help them export their products internationally. These small business loans can support contract delivery, plant and equipment, increased inventory, and offshore expansion and investment, as well as marketing. The broader EFA remit beyond EMDG's marketing and promotion, means that SMEs could utilise these loans to increase their export efforts overall. Potential opportunities for Austrade to work more closely with EFA are outlined below.

## Opportunities to work closely with Export Finance Australia

EMDG and EFA's Small Business Finance Loan Products respond to the needs of SMEs at comparable levels of their export journey. Respective application forms were compared as part of this review process with the intention to:



A closer collaboration between Austrade and EFA has the potential to:

- provide comprehensive information about the range of government support before applicants apply, so that potential applicants would be better informed about relevant support
- reduce duplication, so that applicants will not be required to provide information several times
- offer access to alternative finance, so applicants seeking export support alternatives outside the EMDG application window will be redirected
- enhance data quality to create richer datasets of qualifying information that could be utilised for other purposes, including program design.

EMDG applicants benefit from greater awareness of EFA's services. These services are compatible with EMDG in that they support SME businesses with their products. Austrade should continue the conversation with EFA with a view to formalising a partnership. This could act as a pilot for other collaborative initiatives.

### States and territories

State and territory government representatives confirmed that the EMDG program has a strong reputation in the business community and is viewed as the 'flagship export grant support program' (Global Victoria). State-level grant programs have, as a result, been designed to be complementary and in general focus on established, high-growth businesses. The relationship with Austrade is highly valued and comes with significant investment in the TradeStart Network and – in some cases – representation in international markets.

Examples of state and territory government support includes:

- **New South Wales:** [NSW Going Global Export Program](#)
- **Victoria:** [Global Victoria Access Program](#)
- **Queensland:** [Go Global Export Program](#)
- **Western Australia:** [Access Asia Business Grants](#)
- **South Australia:** [Global Expansion Program](#)
- **Tasmania:** [Accelerating Trade Grant Program](#) and Export Essential Program
- **Australian Capital Territory:** Support from the [Office of International Engagement](#)
- **Northern Territory:** [Global Trade Scheme](#)

Most states and territories identified room for improvement, including a better alignment of broader government programs and activities, and shared data and intelligence. As the South Australian Government put it:

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*‘The EMDG currently supports exporters’ international marketing and promotion activities independently from federal and state/territory trade mission schedules. This lack of structured alignment reduces the ability to leverage collective government investments, share intelligence, and present a unified “Team Australia” presence in priority markets.’*

– South Australian Government

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There are opportunities to leverage existing forums more effectively to increase collaboration and coordination of export support at the federal, and state and territory levels. This includes:

- The Ministerial Council on Trade and Investment, which supports coordinated effort and information-sharing across jurisdictions and is chaired by The Minister for Trade and Tourism. The Council could provide oversight of work to better integrate national trade-support programs and set the strategic direction for future initiatives.
- The National Trade Forum, which facilitates engagement between the Commonwealth and state and territory governments on the practical operation of whole-of-government trade priorities across Australia. Examples of this would include collaboration on international events, and co-services provided to business clients.

## Resourcing

While most recommendations in this report will be cost neutral or could lead to some efficiencies, the main recommendation to move to a merit-based program is significant and could have some resourcing implications.

Careful consideration should therefore be made to ensure the effective administration of a new competitive grants program. In this regard, I note that budget supplementation was agreed for the implementation of the last independent review. Another option, recognising whole-of-government budget constraints, could be to allocate any additional funding from within the overall EMDG funding envelope.



**RECOMMENDATION 24:** Austrade should identify clearer connections between Austrade advisory services, digital tools (Go Global Toolkit) and in-market support to help firms progress their export capability and make more effective use of the EMDG program.

**RECOMMENDATION 25:** Austrade and states and territories should consider how EMDG activities could be better integrated with co-investment trade services like TradeStart.

**RECOMMENDATION 26:** Austrade should formalise a pilot partnership with EFA to provide an enhanced suite of export and loan services to SMEs.

**RECOMMENDATION 27:** The government should ensure continued sufficient resourcing for the EMDG program to implement these recommendations.

# Looking further ahead

The recommendations in this review focus primarily on practical improvements to the program which could be implemented in the next round. Several longer-term issues also warrant consideration



Global trading conditions can shift rapidly and unpredictably. More than ever, the EMDG program framework needs to support flexible decision making so that funding allocations and program settings can meet changing external conditions. Public investment in export development therefore should be focussed on those activities that have the strongest impact on export performance. The following are medium-to longer-term issues that are important to the EMDG program.

## Evaluation and monitoring

Current evaluation and monitoring arrangements do not provide a comprehensive view of how the EMDG program influences business decisions and activities. A more comprehensive and robust evaluation framework would provide a better assessment of the program's impacts. Such a framework would examine how EMDG support affects businesses over multiple years. It would utilise longitudinal data analysis and examine the extent to which the EMDG program contributes to export growth. This evaluation work would help to assess which impacts can be attributed to the EMDG program, and which are due to broader market conditions.

Improved evaluation could address knowledge gaps and consider how businesses progress to more established exporting activities. It could also determine patterns and differences in outcomes across industry sectors, business sizes and their levels of capability. It would confirm whether:

- the program supports the activities it intends to encourage
- the revenue thresholds and grant amounts are appropriate
- the program design continues to be effective.

There should be regular evaluation and reporting cycles, to identify how to respond to changing conditions, refine program design and demonstrate performance over time. The evaluation process should also utilise improved data and analytical techniques. Overall, these improvements would deliver a more robust evaluation and monitoring framework and provide a stronger evidence base for decisions about EMDG.

## Connection with Austrade's trade services and export diversification

Export development for businesses relies on a combination of financial and non-financial support. EMDG operates alongside Austrade's other advisory services, which include market insights, digital tools and in-market networks. Clarifying how these elements interact would help determine how and where businesses benefit along the pathway from readiness to market engagement. Examining how EMDG recipients use Austrade's services would provide clearer insight into the program's contribution relative to other factors and forms of support.

Representative bodies can also influence exporter development. They provide sector-specific guidance, support compliance with regulatory requirements, and identify emerging opportunities. Understanding how the work of these organisations is linked to EMDG settings would help build a more complete picture of the system that shapes early export decisions.

Austrade's support is often provided through or with representative bodies to target a broader audience. Further consideration of how to harness a deeper collaboration between Austrade and representative bodies in increasing business reach – and ultimately EMDG's impacts – may identify productive opportunities for further joint initiatives.

Strengthening evidence on how EMDG operates within this wider support system would improve understanding of exporter progression and the factors that enable sustained export activity. It would also support decisions about how to optimise financial and advisory resources, so they are directed towards activities that have the greatest impact on long-term export performance.

Previous analysis by Swinburne University (2024) and Austrade's Chief Economist (2023) suggested that broader trade services delivered by Austrade have a larger aggregate influence on export outcomes than the EMDG program. They may also deliver higher returns per dollar invested. Moreover, as noted earlier, the Swinburne analysis suggests that exporters receiving both EMDG assistance and trade services assistance achieve greater export outcomes on average, compared with exporters that only receive EMDG assistance.

Consequently, it is important to keep the overall balance of government funding between trade services and EMDG grants under ongoing review. This should be supported by robust evaluation, to ensure the overall national trade benefits are maximised.

## Programs settings and legislation

EMDG is delivered through a specific legislative framework, which comprises the Act, the Rules, the grant agreements and administrative guidelines. Together these instruments define eligibility, allowable expenditure, program structure and grantee obligations. They are designed to ensure transparency and consistency of administration.

Further work could usefully look at the current framework and whether the combination of legislative instruments may limit the ability to adjust program settings as global markets, business models and exporter needs evolve. The overall effect of these instruments looks to be more complex than comparable Australian Government programs. They are also harder for businesses to navigate, in particular smaller exporters. There are few programs of a similar scale or purpose established directly in legislation, and this framework may constrain the responsiveness needed in an effective export development program.

Further work could examine:

- whether legislated requirements remain appropriate for an export development program in rapidly changing trade environments
- the practicality of adjusting program settings when market or business conditions shift
- the administrative requirements created by multiple legislative and procedural instruments, and whether simpler arrangements could reduce complexity and improve efficiency
- implications for decision making and external review (including appeals) within a legislative based model.

The work could set out clear options for the EMDG program for government consideration.



**RECOMMENDATION 28:** Austrade should strengthen the evaluation and monitoring arrangements for EMDG program performance.

**RECOMMENDATION 29:** Austrade should assess the legislative framework for the EMDG program to determine its impact, effectiveness and practicality.



# Acronyms

|                 |   |
|-----------------|---|
| <b>ABN</b>      | Australian Business Number                                    |
| <b>ABS</b>      | Australian Bureau of Statistics                               |
| <b>AI</b>       | Artificial intelligence                                       |
| <b>ANMI</b>     | Accessing New Markets Initiative                              |
| <b>ANZSIC</b>   | Australian and New Zealand Standard Industrial Classification |
| <b>ATO</b>      | Australian Taxation Office                                    |
| <b>Austrade</b> | Australian Trade and Investment Commission                    |
| <b>CEO</b>      | Chief Executive Officer                                       |
| <b>CGRPs</b>    | Commonwealth Grants Rules and Principles                      |
| <b>DFAT</b>     | Department of Foreign Affairs and Trade                       |
| <b>EMDG</b>     | Export Market Development Grant                               |
| <b>EFA</b>      | Export Finance Australia                                      |
| <b>GDP</b>      | Gross Domestic Product  |
| <b>RAM</b>      | Relationship Authorisation Manager                            |
| <b>SME</b>      | Small and Medium Enterprise                                   |

# Appendices

## Appendix A – Other matters raised

This section provides information on stakeholder views that were considered but not adopted as part of the recommendations. In some instances, this was because a range of views were put forward, and some views were at odds with others. Also, many of the views expressed were considered as part of the strategic refocus process in 2024. The case for further change so soon after this refocus process was less evident.

To acknowledge the time given by many stakeholders who raised these issues, the reasoning behind the decision not to make a change is set out below.

### Grant amounts

Stakeholder views varied on the optimal level of grant amounts for businesses and representative bodies. Round 4 delivered an average size of \$53,856 in comparison to around \$24,000 in Rounds 1, 2 and 3. Overall, my conclusion is that the eligibility conditions delivered a reasonable level of grant support for Round 4, from \$20,000 to \$80,000. The larger grant amounts in Round 4 were a positive improvement, and many stakeholders agreed this was a good outcome.

### Eligibility conditions

Some eligibility conditions drew mixed and inconsistent stakeholder feedback following Round 4. Specifically, these were:

- **minimum of 2 years operating under the same ABN:** some businesses said satisfying the '2 years in business' requirement was difficult, notably for start-ups and born-global businesses
- **minimum capacity to spend \$20,000:** smaller businesses find it difficult to spend this amount
- **minimum annual turnover of \$100,000:** smaller businesses expressed dissatisfaction with this amount, noting it was too high and overlooked the specific needs of their business
- **upper limit, annual turnover \$20 million:** large businesses believe \$20 million is too low
- **priority markets for Tier 3:** some business expressed a view that priority markets restricted business opportunities and market choice.

The varied views – from a broad mix of businesses – demonstrate there is no one-size-fits-all approach to meeting all business needs. Noting their concerns I am nevertheless satisfied that more broadly, the outcomes delivered from Round 4 were well accepted across EMDG stakeholders.

I would add that the research by Austrade's Chief Economist and Swinburne University (based on a 10-year average up to 2021–22) provided a reliable basis for the changes to the EMDG program eligibility. It found that businesses with a turnover of less than \$250,000 or more than \$20 million, returned a less positive net benefit from EMDG funding. On balance my conclusion is that the eligibility conditions and the thresholds established for the program are sound and reasonable.

On priority markets, encouraging market diversification remains a priority for the government and the proposed, new 2-tier system and merit assessment will introduce market flexibility for businesses.

### Export performance test

Some stakeholders indicated that ongoing funding in the EMDG program should be linked to export performance and utilise an export performance test. This was a component of the previous reimbursement scheme, however Austrade has advised there are likely to be complexities with administering an export performance test. It is also relevant that the shift to a merit-based approach, which will consider export performance, means there is less need for a dedicated export performance test.

### The 8-year rule and the \$770,000 limit

Some stakeholders requested grant assistance for more than 8 years. As it stands, the 8 years of grant assistance provides confidence for longer-term business planning and access to grants at specific key growth points for the business. Within the annual appropriation, it provides a mechanism to balance fair access for all EMDG businesses to 8 years of support.

On balance, the 8-year limit is sound, however the requirement to set an arbitrary total value limit (currently \$770,000) should be re-evaluated/removed.

### **Goods made outside of Australia**

Some stakeholders suggested that the program could be more strongly focused on 'Australian made' products only, or that the 'goods made outside of Australia' test could be adjusted to be more objective. As Austrade recently strengthened the 'goods made outside of Australia' test this review does not recommend modifying it. If required, Austrade could consider refinements based on evaluation and learnings from Round 4.

### **Establish dedicated priority streams within EMDG**

Some stakeholders suggested the use of dedicated streams such as for First Nations businesses, 'accelerator' businesses, businesses with 'green economy' credentials, tourism, creative industries or priority sectors. This suggestion is at odds with the central tenet of EMDG as a broad-based program.

While it may benefit one sector, it may be to the detriment of businesses in another, given that the program must work within its budget allocation. The introduction of a merit-based assessment will nevertheless help direct program funds in a more appropriate manner.

### **The EMDG program should be administered by the Business Grants Hub**

A small number of stakeholders recommended that responsibility for the EMDG program administration – wholly or in part – could be migrated to the Business Grants Hub under AusIndustry. While full-scale overhaul of the administration of the program was outside the scope of this review, recommendations for improvement have been identified for the EMDG application portal. These should go some way towards addressing stakeholder concerns over program administration efficiencies. Any moving of administrative responsibilities for EMDG is not recommended at this time, though strengthened evaluation and monitoring processes will allow issues like this to be kept under review.

## Appendix B – Terms of Reference

In accordance with the requirement under section 106A of the *Export Market Development Grants Act 1997* ('the EMDG Act') to conduct an Independent Review of the EMDG program ('the program') within five years, the Minister for Trade and Tourism, Senator the Hon Don Farrell has appointed Tim Yeend to conduct a review.

Having regard to changes to the program since the last independent review published in July 2020 and noting there remain opportunities to continuously improve the operation and delivery of EMDG, the reviewer is asked to:

1. Review the quality of current program processes and delivery, with a focus on applicants' experience engaging with Round 4 of the program, including:
  - communications about the program and applicants' experience engaging with Austrade's online, digital, phone and/or email channels
  - examination of options to improve management of grant opportunities within the model of assessing applications until expenditure is fully allocated, including grant round opening and closing processes
  - examination of options for changed allocation of grant opportunities (number and size of grants) across EMDG's tiers
  - opportunities to improve program service delivery that save time, effort and resources for applicants, including scope to integrate EMDG systems and processes with other relevant government programs that EMDG applicants might engage with.

2. Identify how Austrade and representative bodies can work together to optimise representative body members' ability to leverage EMDG funded support to achieve export outcomes.
3. With a focus on optimising a whole-of-Australian-government approach to support for SME's engaging in international business, identify approaches to better connect EMDG to relevant programs and other support provided by other Australian Government organisations, including State and Territories.
4. Identify any other matters the reviewer considers are relevant to the effective operation of the program, achievement of value for money, and delivery of trade outcomes.

The independent reviewer will bring together the findings from a range of available reports, including Austrade's client services projects, review data, external consultant research and stakeholder consultations completed since the last independent review, which explore program changes and the rationale behind them.

The independent reviewer will receive public submissions as part of this Review, consistent with the requirements of section 106A of the EMDG Act.

Out of scope of this review are proposals to amend the EMDG Act, EMDG appropriation levels or the number of tiers in place.

## Appendix C – Changes to the EMDG program

The EMDG program has moved from a reimbursement scheme to an eligibility-based grant since the last review. Iterative changes have been made during the first 4 rounds under the new program.

### The last independent review

The last independent review of the EMDG program (the 'Fisher review') was conducted by Anna Fisher and released in July 2020. Its findings affirmed the value of EMDG to exporters and the importance of government assistance to businesses.

The Fisher Review proposed reforms, shifting from a reimbursement scheme to an up-front grant program. It recommended targeting grant funding through a tiered program, reflecting different stages in the export journey. The Fisher review proposed that a grants model provided upfront certainty of grant amounts. It also proposed that grant agreements could be offered on a multi-year basis. The government accepted the recommendations and implemented changes through a redesign of the EMDG program, the Act, development of the *Export Market Development Grants Rules 2021* ('the Rules') and new guidelines.

### Experience of the EMDG grant program 2021–2024

During the period 2021–24 Austrade conducted 4 rounds of the EMDG program under the amended framework consisting of the Act, Rules (amended in 2024) and guidelines. Across all 4 rounds, Austrade instigated continuous improvement, seeking feedback on program design, eligibility, administration, communications and delivery.

#### Round 1

Round 1 opened for applications from August to November 2021 and attracted an unprecedented 5,384 applications. This was around 2,000 more applications than Austrade had anticipated. All eligible EMDG applicants were offered a grant.

High demand on fixed program funding meant businesses received lower grant amounts than anticipated. Many stakeholders were critical that Round 1 average grant amounts of \$23,825 were significantly less compared to the final year of the reimbursement scheme's average grant of \$41,255, which represented a 42% decrease.

In addition to lower grant amounts, multi-year grant agreements in Round 1 meant that funding for the following rounds was reduced to meet grant payments

across multiple years. Round 2 received 2,758 new applications and Round 3 received 2,184. The impact of the multi-year grant design progressively led to lower grant amounts for these rounds. This is because both new and existing applicants entered an applicant pool, a portion of which was already designated to Round 1 multi-year grantees. Grant amounts would have continued to diminish with annual grant rounds and multi-year grant agreements, because overlapping grant rounds shared the same appropriation.

### Operational review

In August 2022 the Minister for Trade and Tourism, Senator the Hon Don Farrell, asked Austrade to undertake an operational review to identify areas of program design, client experience and communication that could be improved.

Austrade's operational review included stakeholder consultations, as well as a survey. An independent facilitator conducted meetings with businesses, representative bodies and grant agents. Stakeholder feedback reflected positive sentiment about EMDG as a valued program. Businesses were pleased that for the first time in the program's history they knew their grant amount up-front and could spend on export marketing and promotion with certainty. The main dissatisfaction was lower-than-expected grant amounts, and confusion over some elements of the tier system.

Short and medium-term recommendations were made to improve:

- **Communications** (direct and online), including tailored communications to new applicants and those already familiar with the program
- **Process and the application experience**, including system limitations, options to streamline the application and other documents
- **Grant amounts**, including uncertainty about the size of the grant, and whether the application effort is proportionate to the grant amount.

The findings emphasised that in the medium term there was a need to balance the high level of interest in the program against the fixed budget, to ensure businesses received meaningful grant amounts. A range of options to help manage demand were identified during the review. The Minister agreed that Austrade should consult stakeholders on the options to make improvements ahead of Round 4 as part of a strategic refocus of the program.

### Recommendations of the strategic refocus

Building on the operational review, in February 2023 the Minister asked Austrade to strategically refocus EMDG, to test options for improvement that would increase grant amounts and better align the program with the Australian Government's trade policy priorities.

A key focus was to strengthen EMDG eligibility requirements, providing mechanisms to balance demand within the available budget. It should be noted that in May 2023, the government amended the program budget from \$157.9 million to \$110 million per year from 2025–26. In July and August 2023, Austrade consulted on options for change by inviting public submissions, conducting a survey, and holding workshops with businesses, representative bodies, grant agents, and federal and state and territory agencies.

In late 2023 Austrade provided recommendations to the Minister who approved changes, which were then endorsed by the Prime Minister in January 2024. To implement the changes the *Export Market Development Grants Amendment Rules 2024* ('the amendment Rules') were tabled in Parliament on 20 March 2024.

The changes amended eligibility for multiple purposes:

- to support Australian exporters to develop new markets in line with trade-diversification priorities
- to deliver more impactful grants to those businesses most capable of effectively using the funds
- to ensure sustainability.

The amendment Rules provided new eligibility conditions enabling Austrade's CEO to exercise discretion to manage high demand in the program, select quality businesses, and target eligibility towards government priority markets. These program management features were not available to rounds 1-3.

**TABLE 7:****Summary of key changes to the program following the strategic refocus****First-in first-served**

Applications were assessed, and grants were offered in the order they were received until funding was fully allocated. This was in place of a demand-driven approach with a specified application period, where all applications were assessed and grant funding was divided among eligible applicants.

**The cadence of the application period covered 2 financial years**

The round was for 2 financial years (2025-2026 and 2026-26) rather than one year but maintained multi-year grant agreements for up to 2 years.

**Eligibility conditions that could be adjusted for each round were introduced**

Business turnover must be more than \$100,000. Austrade's CEO used discretion to determine a higher amount for Round 4 for:

- Tier 2: \$500,000
- Tier 3: \$1 million.

Applicants must have the capacity to spend at least \$20,000 of their own funds on marketing, exclusive of the grant amount. A higher amount can be determined at the discretion of Austrade's CEO. This discretion was not applied for Round 4.

Businesses must have the same ABN for a minimum of 2 years. Austrade's CEO has discretion to determine a higher number of years. This discretion was not applied for Round 4.

**Tier 1 applicants must complete a more substantial export readiness requirement**

Tier 1 applicants must complete export training and/or the Austrade export readiness test, compared to just a declaration.

**Key markets can be determined for the program**

Austrade's CEO has discretion to specify eligible markets for one or more tiers, or for representative bodies. For Round 4, 27 key markets were specified for Tier 3.

**High-quality plans were required**

Businesses and representative bodies were required to provide high-quality plans to market. Representative bodies were required to provide a plan for training activities, where applicable.

Yearly limits were introduced for tiers

Businesses can still receive up to 8 years of EMDG funding, with yearly limits for each Tier:

- Tier 1 – 2 years
- Tier 2 – 4 years
- Tier 3 – 4 years.

From Round 4, calculations for 8 years include each financial year a grant agreement is entered into or the number of grants previously paid. This includes years when grant recipients report nil activity or do not receive a grant payment.

**Goods made outside of Australia**

The requirement was strengthened requiring businesses to meet all 4 conditions, rather than 3 of the 4. This includes ensuring that the assets, activities, value and employment related to the goods are substantially Australian.

**Probity requirements were strengthened with additional fitness for grant requirements**

In addition to requirements that applicants and grantees do not have any outstanding disqualifying convictions or be under insolvency administration, additional conditions were introduced, which require applicants to be tax compliant, and to conduct business in a professional and ethical way that would not risk Australia's trade reputation.

**Option to open applications for different tiers**

Austrade's CEO invited all tiers to apply for Round 4. The CEO can decide to open only one, or any combination of tiers.

## Appendix D – Round 4 data

### Profile of applicants and grantees

All 2,693 applications received in Round 4 were assessed. Applicants in Round 4 included:

- 18 First Nations businesses and representative bodies
- 43 representative bodies that indicated they planned to deliver export training
- 632 businesses that completed Austrade's export readiness test.

As of 19 January 2026, of the 2,693 Round 4 applications, 2,271 have received a grant offer. Of these, 2,230 have signed a grant agreement committing \$206.1 million over 2 years. A total of 41 grant offers were not accepted due to applicants no longer wishing to proceed with their plans.

53 per cent (1,192) of grantees have received an initial payment of \$20,000, totalling \$23.8 million.

As demand for Tier 2 in Round 4 exceeded the \$104.5 million annual funding, Austrade successfully reallocated available funds from other tiers to ensure more eligible applicants could benefit from the program.

In addition, approximately \$13 million in unspent commitments from the previous 3 rounds were reallocated to Round 4. This followed cancellation of non-compliant grant agreements. This allowed Austrade to make 273 additional funding offers from 2025–26, ensuring all eligible applicants received a 2025–26 grant offer in addition to their existing 2026–27 grant.

410 applicants were deemed ineligible, mostly due to their not meeting product or tier eligibility, or not providing mandatory evidence of eligibility. All internal reviews have been completed, and 7 ineligible applicants have lodged appeals with the Administrative Review Tribunal.

**TABLE 8:**

**Average export sales by tier (as of 19 January 2026)**

| Tier   | Year | Median export earnings | Maximum export earnings | Average export earnings |
|--------|------|------------------------|-------------------------|-------------------------|
| Tier 2 | 2023 | \$450,000              | \$17.7 million          | \$1.2 million           |
| Tier 3 | 2023 | \$391,000              | \$158.3 million         | \$1.5 million           |

Round 4 supported grantees across a range of industries with the capacity and capability to make effective use of the grant funding.

**TABLE 9:****Breakdown of grantees by industry (e.g. ANZSIC codes) (as of 19 January 2026)**

| Industry  | Number of applications |
|---|------------------------|
| <b>Services and technology</b><br>(e.g. software publishing, computer system design, management advice and related consulting services, etc.)   | 813                    |
| <b>Consumer – advisory</b><br>(e.g. clothing retailing, cosmetic and toiletry preparation manufacturing, non-store retailing, clothing manufacturing, etc.)                               | 399                    |
| <b>Food and agriculture</b><br>(e.g. wine and other alcoholic beverage manufacturing, other food product manufacturing, other grocery wholesaling, etc.)                                  | 317                    |
| <b>Advanced manufacturing</b><br>(e.g. other manufacturing, electric lighting equipment manufacturing, medical and surgical equipment manufacturing, etc.)                                | 234                    |
| <b>Education</b><br>(e.g. adult, community and other education, technical and vocational education and training, higher education, etc.)  | 212                    |
| <b>Tourism</b><br>(e.g. Travel agency and tour arrangement services, accommodation, scenic and sightseeing transport, etc.)   | 107                    |
| <b>International health</b><br>(e.g. pharmaceutical, cosmetic and toiletry goods retailing, human pharmaceutical and medicinal product manufacturing, other allied health services, etc.) | 85                     |
| <b>Infrastructure</b><br>(e.g. architectural services, marine equipment retailing, other electricity generation, etc.)  | 56                     |
| <b>Resources and energy</b><br>(e.g. other mining support services, gravel and sand quarrying, metal and mineral wholesaling, etc.)   | 7                      |
| <b>Total</b>  | <b>2,230</b>           |

With Round 4 funding, grantees are planning to target one or more markets, with the top 10 most frequent markets listed below.

**TABLE 10:****Targeted markets by executed grant agreements (as of 19 January 2026)**

| Rank | Market                   | Grantees planning to export to market | Percentage of Round 4 grantees planning to export to market |
|------|--------------------------|---------------------------------------|---|
| 1    | United States of America | 1,553                                 | 73%   |
| 2    | United Kingdom           | 1,259                                 | 59%   |
| 3    | Canada                   | 887                                   | 42%   |
| 4    | Singapore                | 832                                   | 39%   |
| 5    | China                    | 667                                   | 31%   |
| 6    | Germany                  | 635                                   | 30%   |
| 7    | France                   | 541                                   | 25%   |
| 8    | Japan                    | 528                                   | 24%   |
| 9    | United Arab Emirates     | 441                                   | 21%   |
| 10   | Hong Kong                | 430                                   | 20%   |

**Application lodgements**

Grant agents lodged 1,682 applications in Round 4 (62% of the total applications) and 1,011 applications (38%) were self-lodged by businesses and representative bodies.

In Round 4, 91% of grant agents were successful in receiving grant agreements for their clients while 69% of self-lodgers were successful in receiving a grant agreement.

**TABLE 11:****Success rates of self-lodgers and grant agents (by executed grant agreement) (as of 19 January 2026)**

| Lodged by    | Representative body | Tier 1     | Tier 2       | Tier 3     | Total        |
|--------------|---------------------|------------|--------------|------------|--------------|
| Grant agent  | 58                  | 190        | 832          | 449        | <b>1,529</b> |
| Self         | 52                  | 125        | 234          | 290        | <b>701</b>   |
| <b>Total</b> | <b>110</b>          | <b>315</b> | <b>1,066</b> | <b>739</b> | <b>2,230</b> |

### Internal reviews

Applicants who are not satisfied with the outcome of their application may request Austrade to undertake an internal review provided it involves a reviewable decision (as per section 97 of the Act). In Round 4, a total of 1,130 applications were initially deemed ineligible. Of these ineligible applications, 812 internal reviews were requested and 720 were found eligible upon review.

**TABLE 12:**

**Internal reviews of application outcomes (as of 19 January 2026)**

| Lodged by  | Representative body | Tier 1 | Tier 2 | Tier 3 | Total      |
|--|---------------------|--------|--------|--------|------------|
| Ineligible applicants who did not lodge an internal review | 9                   | 141    | 55     | 113    | <b>318</b> |
| Ineligible applicants who lodged an internal review        | 19                  | 170    | 301    | 322    | <b>812</b> |
| Applications found eligible upon review                    | 17                  | 134    | 288    | 281    | <b>720</b> |
| Applications upheld as ineligible after review             | 2                   | 36     | 13     | 41     | <b>92</b>  |

There are numerous reasons an application may be deemed ineligible. In Round 4 some applicants may have been ineligible for multiple reasons.

**TABLE 13:**

**Top 5 reasons for ineligibility in Round 4 (as of 19 January 2026)**

| Reason for ineligibility  | Number of applications |
|---|------------------------|
| Bank statements not outlining minimum capacity to spend                     | 285                    |
| Inadequate evidence to demonstrate tax compliance                           | 232                    |
| Did not provide evidence of export invoices                                 | 228                    |
| Financial statements not provided or provided for different financial years | 104                    |
| Attachments unable to be opened   | 77                     |

## Appendix E – Overview of the consultations for the review

### Consultation period

The consultation period opened on 15 July 2025 and closed on 12 September 2025. During this period, an online survey was open for 4 weeks between 15 July 2025 and 15 August 2025.

### Guidance for stakeholders

The [Consultation Paper](#), available on the Austrade website, supported participants during the consultation process by outlining key areas for consultation and guiding questions for stakeholders to consider when providing their feedback.

### Participation

- The review received **125** submissions through the online submission form and via email.
- The survey received **236** survey responses.
- A total of **61** face-to-face and online consultations were held in Adelaide, Brisbane, Canberra, Melbourne and Sydney as well as online.

**TABLE 14:**

### Stakeholder participation in the consultation process

| Participation    | Businesses | Representative bodies | Grant agents | Government representatives | Other | Total      |
|------------------|------------|-----------------------|--------------|----------------------------|-------|------------|
| Submissions      | 93         | 17                    | 12           | 3                          | N/A   | <b>125</b> |
| Survey responses | 188        | 24                    | 22           | N/A                        | 2     | <b>236</b> |
| Meetings         | 9          | 16                    | 10           | 25                         | 1     | <b>61</b>  |

Meetings included consultation with federal and state and territory agencies which included:

#### Australian Government

- Department of Industry, Science and Resources
- Department of Foreign Affairs and Trade
- Prime Minister and Cabinet
- Digital Transformation Agency
- Department of Finance
- National Indigenous Australians Agency
- Office of the Arts
- Treasury
- Export Finance Australia

#### State and territory government

- Invest and Trade WA
- Global Victoria
- Office of International Engagement (Australian Capital Territory)
- Department of State Development (South Australia)
- Department of State Growth (Tasmania)
- Investment NSW
- Department of Trade, Business and Asian Relations (Northern Territory)

### Communications about the consultation period

The independent review consultations were promoted to subscribers of Austrade's external newsletters, through Austrade's client-facing teams, through targeted messages to representative bodies and other government representatives, social media, and on the Austrade website.

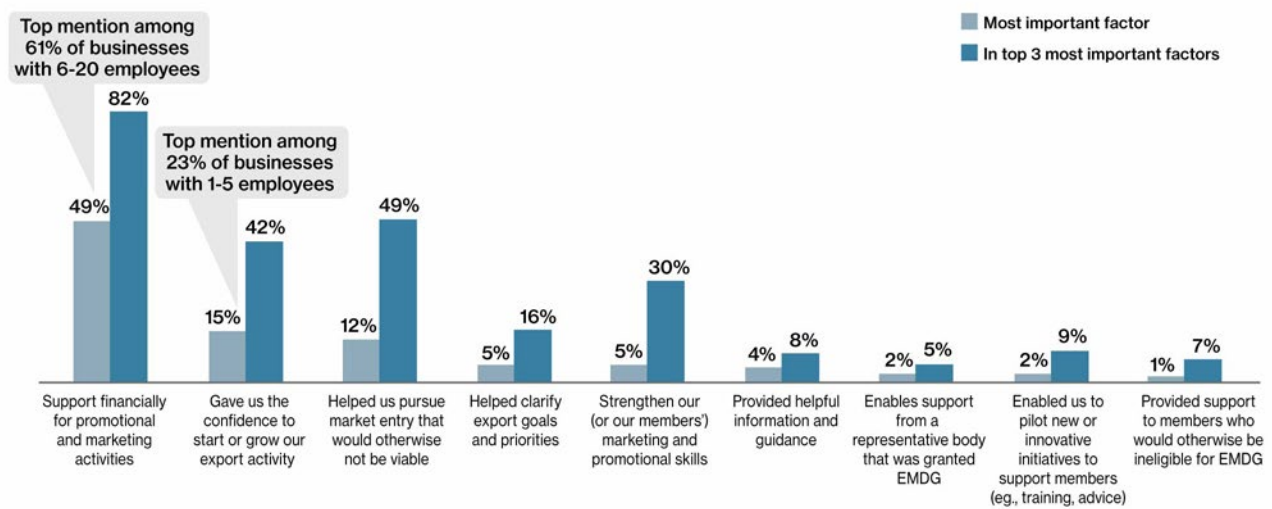
## Appendix F – Roy Morgan survey findings

The survey questionnaire had 52 questions. Responses from the survey show how stakeholders feel about their experience with the program and how it could be improved, considering the introduction of the changes in Round 4. The survey was undertaken by Roy Morgan on behalf of the review.

### Value of the EMDG program

Respondents highlight the greatest value provided by the EMDG program includes financial support for promotional and marketing activities (49%), confidence to start or grow export activity (15%), and help to pursue market entry that would otherwise not be viable (12%).

**GRAPH 3:**  
Greatest value of the EMDG program



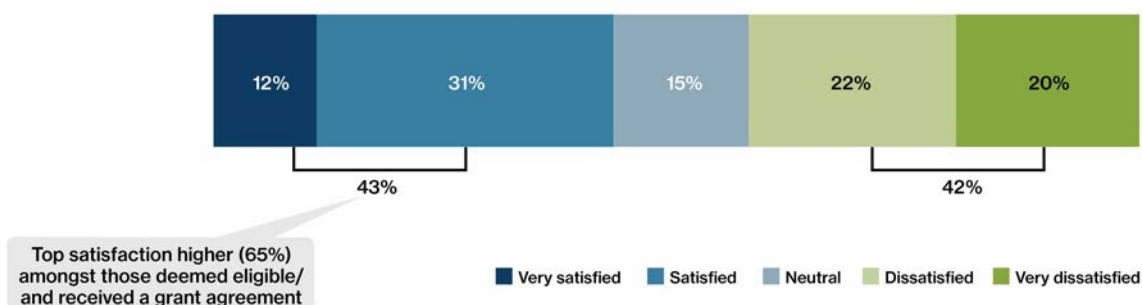
Respondents who have received EMDG said they received the following benefits:

- expanded marketing and promotional activities (69%)
- strengthened relationships with overseas buyers/partners (63%)
- increased export sales (62%)
- improved brand visibility overseas (62%).

### Overall experience with Round 4

When asked about their experience in Round 4 respondents were equally satisfied (43%) or dissatisfied (42%) with the overall experience.

**GRAPH 4:**  
Overall satisfaction with Round 4 EMDG experience

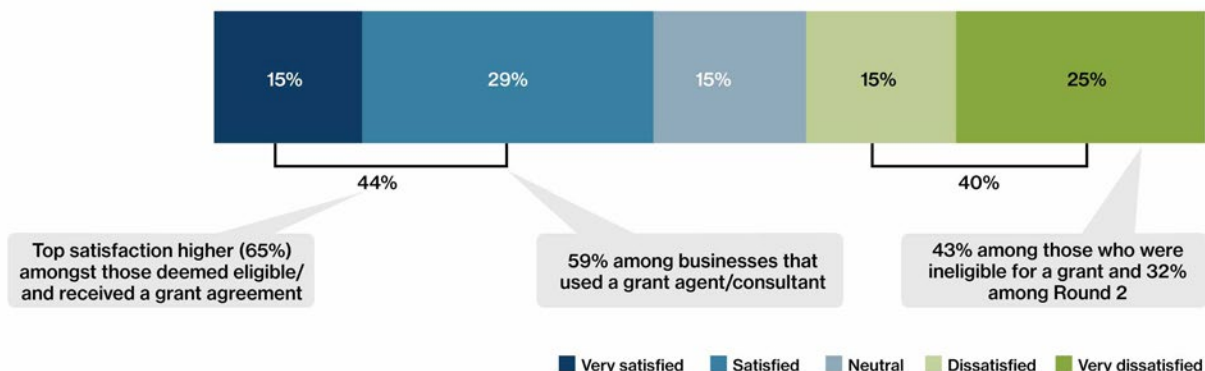


## Application process

Respondents that rated their overall most recent experience (in any round) of applying for EMDG were about equally satisfied (44%) or dissatisfied (40%) with the application process. Among businesses that used a grant agent, 59% reported they were very satisfied or satisfied with the application process. Respondents reported a better experience with the application process for Round 3 and 4.

### GRAPH 5:

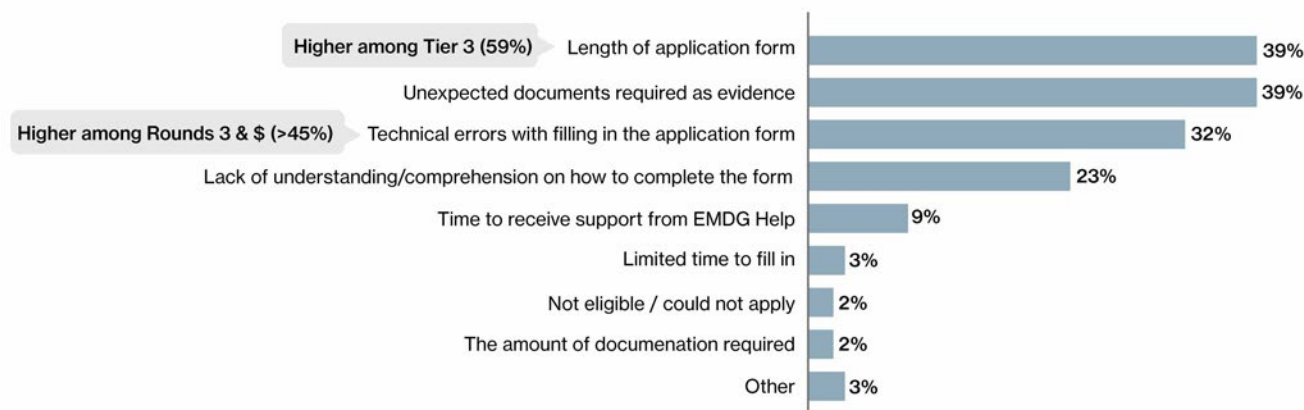
#### Overall experience with the EMDG application process



The most difficult steps in the most recent EMDG application process were linking the Digital Identity to the business in Relationship Authorisation Manager (RAM) (27% found it difficult or very difficult), and preparing and uploading all necessary attachments (22% found it difficult or very difficult).

### GRAPH 6:

#### Main reason why the most recent EMDG application took more time than expected



The main reasons that applicants used a grant agent to complete the application process included:

- they wanted their expertise (75%)
- the guidelines and Rules were complicated (51%)
- they worried they would get it wrong and miss out in this round (51%).

The factors that would help businesses and representative bodies to complete their own application forms included:

- greater clarity on funding availability (42%)
- clearer eligibility criteria (28%)
- improved online application portal usability (28%)
- reduced documentation or attachment requirements (25%).

## Changes recommended by survey respondents

Related to the first-in first-served approach, respondents indicated they would prefer a different allocation method (e.g. merit-based) (55% strongly agreed or agreed with the statement).

- 44% strongly disagreed or disagreed that the tier allocations were appropriate.
- 42% strongly disagreed or disagreed that the process was fair.
- 38% strongly disagreed or disagreed that the reasons for the changes were clearly communicated.

There were mixed views about the grant size in Round 4. Some respondents indicated the amount was too small to meaningfully support export marketing and promotional activities (20%), while others indicated the grant amount was about right for their needs and their ability to match it (31%).

- Some respondents very strongly or strongly supported larger grant amounts, but fewer grants (20%).
- Some respondents very strongly or strongly supported smaller grant amounts and more grants available (31%).

Respondents said improvements could be made to Austrade's communications about the program indicating:

- more information provided ahead of the round opening would be beneficial (47%)
- more updates on assessments and appeals timelines should be provided (34% overall, but higher at 46% for Round 4 applicants)
- more detail on the website would be helpful (26% overall, but higher at 32% for Round 4 applicants).

Respondents would strongly or very strongly like to see the following changes:

- simplified application experience (67%)
- simplified guidelines and eligibility documentation (65%)
- faster application outcomes (63%)
- more transparency on how grants are allocated (61%).

## Other government support

Respondents accessed a range of other government program/s including financial support (e.g., grants, loans) (62%); market access assistance (e.g., trade shows, business missions) (49%); and other government support (not specified) (33%). Respondents indicated they had engaged with the following government agencies:

- Trade and Investment Queensland (9%)
- Austrade (6%)
- Creative Australia (4%)
- Global Victoria (4%)
- Unspecified state government agency (49%).

## Appendix G – WhereTo Report on Behavioural Analysis of SME Exporters

### Overview of key findings

In 2025, Austrade engaged WhereTo Research to conduct a behavioural analysis of Australian SMEs. The report's objective was to examine their experiences and challenges as exporters, as well as the role that the EMDG program plays in their export activities. The study was supported by extensive qualitative research involving 90 SMEs, conducted between February and April 2025.

### Impact of the program

Data collected suggests that the program is largely viewed as valuable. The program enables export growth by supporting business to undertake activities they might not have otherwise pursued due to the

high costs and risks involved. The impact appears proportionally greater for smaller businesses (Tier 1, early Tier 2), empowering them to initiate activities. More established exporters (Tier 2 and 3) also benefit significantly and attribute their strengthened export strategies to the program's support.

### Perceptions of EMDG program benefits

One of the most important findings of the report is that EMDG is recognised as an enabler of export growth, with impacts extending beyond financial support. The program has a significant impact on SME behaviour at various stages. Evidence demonstrates that the application process itself can be a catalyst for strategic planning. Other recurrent benefits include:

**TABLE 15:**

#### Perceptions of the program's benefits

| Perception                               | Benefit   |
|--|---|
| De-risking and confidence building       | Reduces financial risk, boosts confidence and encourages activities that might otherwise be delayed.  |
| Enabling growth activities               | Supports deeper market penetration and enables diversification by providing a financial buffer for speculative and innovation activities.         |
| Encouraging more sophisticated responses | Enables businesses to 'level up' their marketing and promotional efforts, funding market research, product localisation and targeted advertising. |
| Attitudinal and behavioural shifts       | Helps to foster a 'planning mindset', validates export ambitions, and creates accountability.   |

### Key behaviours and motivations

The report also mapped some key patterns of behaviour across different business groups:

**TABLE 16:**

#### Key behaviours and motivations

| Feature                     | Tier 1: Getting Ready                                       | Tier 2: Consolidating  | Tier 3: Diversifying   |
|-----------------------------|---|--|--|
| Dominant planning behaviour | More ad-hoc, reactive; EMDG can nudge formal planning.      | More formalised, annual objectives; still some reactivity.   | Strategic, data-informed; long-term vision and export goals.     |
| Key motivations for export  | Initial market exploration and selection.                   | Deepening market penetration, building scale, stronger ties. | Entering new markets, geographic risk spread.                    |
| Primary use of EMDG         | Travel, trade shows, basic marketing, samples, etc.         | Strategic travel, trade shows, local partner engagement.     | Research and targeted marketing in new regions.                  |
| Key behavioural impact      | De-risks initial steps, boosts confidence, forces planning. | Supports sustained effort, enables higher investment.        | De-risks market entry, provides boost for push into new markets. |

### Engagement with Austrade

The report concluded that Austrade is appreciated as a strong ally amongst those who engage with the organisation. Austrade's trade services and resources are highly valued when they can facilitate in-market introductions, enhance market knowledge and provide advice that helps SMEs approach export activities with greater confidence. State and territory government trade services are also acknowledged for providing support.

For smaller SMEs, however, it can be difficult to understand how to approach Austrade or utilise its resources. SMEs in the services and technology sectors were also more likely to feel that Austrade did not have as great an affinity with their businesses because they did not operate like 'traditional' exporters.

## Appendix H – Summary of the Chalfont Consulting report on the EMDG online system

### Systems review scope

In 2025, Chalfont Consulting ('Chalfont') was asked to conduct an assessment of the EMDG online portal and system. The objective was to evaluate its current compliance, functionality and usability against:

- Digital Transformation Agency mandatory digital service standards
- Web Content Accessibility Guidelines 2.2 accessibility standards
- Industry best practice.

Consultants considered:

- **Expert user experiences:** Chalfont undertook manual testing of the portal including keyboard navigation, screen reader compatibility, colour contrast analysis and code review.
- **Stakeholder feedback:** Chalfont reviewed feedback from the independent review stakeholder consultations, past usability reports, and internal Austrade responses.
- **Documents:** Chalfont analysed system-related documents provided by Austrade such as solution design and architectural papers, to validate its approach to reviewing the system.

### Systems review findings

The independent system review confirmed that the EMDG platform is built on a robust, multi-layered architecture, leveraging a React.js portal at the user-facing front end and Microsoft Dynamics 365 on the back end. This core structure was assessed by Chalfont as technically strong, well-supported, stable, and resilient enough to manage the current grants program lifecycle (application, grant agreement and milestone-reporting stages).

On balance, React.js is an appropriate choice for the portal's front-end. It is flexible, scalable and easy to maintain through its modular architecture.

React.js is generally reliable and widely adopted across industry and similar government portals. However, a trade-off of React.js' stability, maintainability and reasonable operating cost, is the effort, complexity and limited agility to make changes. Implementing iterative changes (like adding application questions or deploying new features) will require Austrade to complete custom development work on the portal. In comparison, the Microsoft Dynamics 365 back-end allows for rapid internal changes to business processes via configuration.

Chalfont's review of the system found that most of the opportunity to improve accessibility and usability is in the front end where applicants and grantees interact with the portal. Austrade could consider if rebalancing the portal and system for agility and rapid change would represent value for money. Specifically, Austrade might consider if migrating to a new front-end platform (such as PowerPages for native and configurable portals built directly on Microsoft Dynamics 365) would have a return on investment in real terms over the next 5-year planning window.

**TABLE 17:****Where improvements can be made to the online portal**

| Feature   |
|---|
| <p><b>1. Consider improving front-end flexibility.</b> The current React.js portal on the front end of the system limits agility for implementing changes, requiring custom development for minor updates to the portal. Migrating to a configurable platform like PowerPages could enable faster deployment and better alignment with Dynamics 365, and reduce the operational overhead. This change should be evaluated for cost-benefit over a 5-year horizon.</p> |
| <p><b>2. Enhance integration and automation.</b> Expand automation for internal processes, such as assigning applications to approvers and generating notifications. Consider embedding AI-driven document analysis and risk scoring to streamline assessments and improve efficiency.</p>  |
| Processes, functionality and usability  |
| <p><b>3. Introduce an auto-save feature and session management.</b> Add an auto-save feature to preserve applicants' progress in the portal and reduce data loss if their session times out. Complement this with timeout warnings and explore options to extend the current 1-hour session limit. These measures address usability gaps and digital service standard compliance.</p>   |
| <p><b>4. Strengthen error handling.</b> Implement clear, field-level error messages that appear immediately upon submission and provide actionable guidance. This will reduce confusion and improve compliance with input assistance standards. Current design issues, such as generic error placement and lack of visual cues, must be addressed.</p>  |
| <p><b>5. Simplify document upload workflow.</b> Consolidate prompts and confirmation steps for uploading files and replace generic 'OK' buttons with action-specific labels. Enable duplicate file name checks and activate drag-and-drop functionality to meet applicants' expectations. These changes will significantly improve usability and reduce friction.</p>   |
| <p><b>6. Improve navigation and login path.</b> Ensure the 'Login' link directs applicants and grantees straight to the login gate. Redundant links should be removed to reduce confusion. Streamline enquiry paths by linking directly to EMDG-specific enquiry forms. These changes will improve task initiation and reduce misrouted requests.</p>   |
| Standards and compliance  |
| <p><b>7. Address accessibility gaps.</b> Fix keyboard navigation issues, enforce sequential heading hierarchy, and implement high-contrast focus indicators. These usability changes are critical for assistive technology users such as screen readers.</p>  |
| <p><b>8. Implement inclusive communication.</b> Break down large guidance blocks into smaller, contextual snippets and use tooltips for progressive disclosure. Audit terminology for consistency and simplify language to meet the Web Content Accessibility Guidelines 2.2 reading level standards. These steps will improve clarity and reduce cognitive load.</p>   |
| <p><b>9. Ensure content reflow and skip links.</b> Test and adjust layouts for 400% zoom reflow and add functional skip links for keyboard users. Ensure link text is descriptive and meaningful.</p>   |
| <p><b>10. Optimise portal for low bandwidth.</b> The portal should be technically reviewed to minimise data size and improve performance for users with slow internet. Key actions may include compressing images, increasing upload timeout limits, and enabling upload resume functionality. These improvements will enhance accessibility and reduce frustration for regional users.</p>   |

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