Chapter VII

CHALLENGES AND PROSPECTS OF INDO-GERMAN COOPERATION: SCOPE FOR MUTUAL LEARNING

INTRODUCTION

Inevitably, the unification of Germany has entailed newly working out of political and economic relationships between Germany and the rest of the nations. As an immediate consequence, India lost a major "soft currency trading partner" (former GDR), which traded goods and services worth Rs.4.2 billion in 1990. The other "over-riding concerns", which have a bearing on German investment in India are: consolidation of Germany's inner unity; support to reform in Eastern Europe; further developments of the European Community and creation of, in the words of Winston Churchill, a "United States of Europe" ensuring security throughout Europe and establishing a peaceful order in the whole continent, and growing internal demands. In the expressed opinion of a German official, "Germany wants to be part of Asia".\(^1\) for which India is the "preferred collaboration partner", due to its growing trade with its Asian neighbours.\(^2\) In the Indian perception, Germany as an economic superpower is the gateway to the industrialized west. Over the decades, Germany has also emerged as India's strong economic partner.

The visit of the Indian Prime Minister to Germany in September 1991, within three months of adoption of India's new economic policies in mid-1991, was in a

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\(^1\) G. Krueger, Executive Director, Indo-German Chamber of Commerce, *Times of India* (New Delhi), 17 August 1994.

\(^2\) India's export to the East Asian countries grew at an average of 61 per cent or three times the average growth rate of India's world exports.
way an announcement to the world about India's systemic shift from the State-directed economy to the capitalist mode.

Eliciting support for the new economic policies, which endeavoured to set aside the earlier approach of self-reliance in order to integrate with the global economy, the Indian Prime Minister sought to convince the German officials that India had embarked on a historical endeavour for economic renewal and revitalization. He said:

"We want to make Indian industry more competitive and efficient. We are determined to integrate India fully into the mainstream of world economy..."

In this, he said, India counted on German understanding and support. He added:

"I believe there is a strong mutual interest in enabling India to make a success of its bold and sweeping reforms. There is a potential for an enduring and mutually rewarding partnership that has barely been explored."

Prime Minister Rao's visit was intended to convince potential foreign investors that the new economic package was an enduring phenomenon and represented the considered thinking of his government on the need for a new and healthy political and economic environment. The Germans needed to be convinced that the Indian government had taken a conscious decision to open the economy to foreign investment and to introduce a degree of competition in Indian industry.

Reciprocating India's desire for enhanced relations, Germany reiterated its commitment to support both bilaterally and in international fora India's efforts to revitalize its economy. Chancellor Kohl expressed the hope that India's far-sighted

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4 ibid.
policy of economic reforms would make it easier for the international community to assist her in overcoming the difficulties speedily.

He told the Indian Prime Minister that he was "among friends" who had a particular interest in and great affection for India. The unification of Germany and the ensuring tasks of modernization, he said, had led to an increase in demand on a scale that would benefit Germany's trading partners. He also expressed the view that the single European market would result in a further upswing in the Indian economy.

Encouraging this optimistic view, a German foundation in late 1991 forecast that in about a year's time, India's credit-rating in Germany would double, which would augment significantly the inflow of investments from that country. The US Commerce Department had also then rated India among "top five hot" countries for foreign investments. This was in contradiction to the 113th position it had held a year earlier.5

India's share in Germany's global trade or even in German trade with developing countries, has always been marginal. But since Germany's unification India's trade with Germany has grown relatively.6 The trade deficit in 1990 had reached a peak of 73.3 per cent from 31.5 per cent in 1988. But, in 1991, the year in which the new economic policies commenced, India, for the first time in the history of Indo-German trade relations, experienced a trade surplus of DM 376 million. Again in 1994, India achieved a marginal trade surplus of DM 0.15 billion. Overall, India's exports to Germany increased from DM 2.77 billion (1991) to DM


6 The share of India in global trade of Germany has marginally improved from 0.88 per cent in 1990 to 1.20 per cent in 1995.
3.49 billion (1994); and India's imports from Germany went up from DM 2.39 billion (1991) to DM 3.34 billion (1994). In 1995 Indo-German trade increased to nearly DM 8 billion. The trade surplus in 1991 was, however, mainly due to the tight foreign exchange situation and import compression in India. With the lifting of most of the restrictions and the positive thrust given by the budget of 1992-93 to the import of capital goods, in the first half of 1992 itself German exports to India showed an increase of 22 per cent over the previous half-year period.

An encouraging trend was the steep rise in the exports of finished and semi-finished products. Trade was intensified in the areas of industrial machinery, in particular machinery for the textile and leather goods industries, power generation and telecommunication as well as iron and steel goods. There was sustained graduation of India's exports from raw materials to primary and finished goods and in recent years, to technical products as well. Since 1992 India's exports to Germany of technical products, for example auto ancillaries, iron and steel products, chemicals and pharmaceuticals, etc., continuously increased. Yet there was a down trend in India's exports to Germany after an early boom. All the items that used to be of particular interest to the Germany market, such as carpets, leather goods, fabrics, coffee and tea were declining steadily. For instance, the exports of coffee after a rise of 147 per cent in 1994 (due to shortage in world supply) subsequently declined. South Korean leather products, with their superior quality and lower price (10 to 15 per cent lower than Indian prices) and Pakistani sporting goods with their lower price (by 10 to 15 per cent) were among the items that had an edge over Indian goods.

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7 Indo-German Cooperation, *Annual Reports 1991 to 1995 (Various issues)*, Indo-German Chamber of Commerce (Bombay).

8 In 1992, it amounted 61 per cent of the total exports. Ibid.
In industrial collaborations, Indo-German economic relations have shown substantial gains. During 1991-95 many high-profile collaboration agreements were signed, going up from 157 in 1991 to 252 in 1995. For the first time in 1995, technical collaborations were more than industrial collaborations in Indo-German economic history (129 against 123). Industrial machinery had the highest number of such agreements followed by chemicals and pharmaceuticals and electrical equipment. Relatively new areas which were gaining prominence were food and beverages and auto ancillaries industry with 18 and 11 new sections in 1995. Overall, the total number of collaborations during 1990-95 was 998 compared to 1400 during the decade of the 1980s.9

According to a study by the Ministry of Industry, 68 per cent of all Indo-German investment proposals were approved between 1991 and 1994, as against a mere 13 per cent for the USA and 44 per cent for the UK. In other words, German firms really mean business. More so, Indo-German joint venture firms have increased their share of sales of India's top 100 companies from 8 per cent to 17 per cent. Unified Germany's involvement in multilateral and bilateral development with India has thus not lessened10 After Japan, Germany was India's principal partner in financial and technical cooperation. German assistance11 continued to be high, at DM 435 million (1991), DM 550 million (1992), DM 597.7 million (1993), DM 366.6 million (1994) and DM 340 million (1995). A new generation of cooperation

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10 After unification other developing countries had an average reduction of 20-25 per cent of Germany's assistance.

11 German assistance has a repayment period of 40 years, inclusive of a 10-year grace period and an interest rate of 0.75 per cent.
projects also emerged, such as in health, family welfare, basic education, rural water supply and sanitation, lift irrigation, forestry, integrated rural development, and housing for economically weaker sections. The emphasis in the cooperation projects is on the protection of environment through projects for control of industrial pollution and watershed development and on the development of the private sector including technical training, support of small-scale industries and the facilitation of Indo-German collaboration. Assistance would be evaluated on five criteria: popular participation in political decision-making, the rule of law, human rights, market-oriented economic policy, and development orientation in State activities.

Participation by Indian industries in trade fairs held in German cities has also increased from a mere two participants in 1965 to around twenty in the early of 1970s, fifty in the early 1980s, to more than 1,080 now. During the 1980s, travel agents helped in boosting the participation of Indian visitors. It was only in 1984 that the major Indian engineering companies were able to demonstrate their capacity to market products. By the mid of 1980s median Indian capital goods emerged as successful trade fair participants. Since the advent of economic reforms in India, a new trend has been observed in the German trade fair, which provides good opportunities for Indian industries. The general tendency among the non-European buyers is to go for middle-level technology machines and equipment from counters like India as the machines offered by the industrialized nations are too expensive and highly automated, which often cannot be used to full capacity by these countries. Many African and Latin American countries opt for middle-level technology industries...a new buying group from East Europe countries, particularly from

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12 For example printing, packaging, plastics, wire and tube, metal processing, glass technology, instrumentation and automation.
Poland, Bulgaria, Ukraine and Romania show an increasing interest in Indian products.\textsuperscript{13}

Most Indian exhibitors (95 per cent) in German fairs are small and medium-sized companies. But regretfully, "the bigger companies from India do not use the opportunity to make trade fairs a marketing centre for export-promotion".\textsuperscript{14}

**CHALLENGES AND PROSPECTS**

A major challenge before Indian industry is its poor competitiveness. This is partly a result of the fabric of the Indian domestic market and partly a psychological factor. A German scholar, Dietrich Kebschull, says:\textsuperscript{15}

\[\ldots\text{Business in India in the domestic market may be difficult. It is, however, duly comparable to the "grammar school", while export to countries of the European Community, in particular to Germany, are akin to the "university".}\]

In Kebschull’s view:

It is a widespread misunderstanding of business that success and profit at home is less valuable than achieving the same result abroad. Companies well positioned in the domestic market, but with too small a capital base or very limited management capacity would not be well advised to run high risks by concentrating without good reasons on foreign markets.

After decades of protectionist policies, Indian industry is faced with the fact that most of it, using outdated technologies and manufacturing low quality products,

\textsuperscript{13} K.C. Damodaran, Secretary and Head of Trade Fair Department, IGCC (Bombay) quoted in *Economic Times* (New Delhi), 28 July 1994.

\textsuperscript{14} Ibid.

is not internationally competitive. It has been realized in the wake of liberalization that, for modernization and restructuring, imports on a huge scale are necessary. Since no other sources of foreign exchange are in sight, export earnings alone can finance this requirement. Thus, increase of exports has become a national agenda. In addition, many Indian entrepreneurs seem to harbour a feeling of inferiority vis-a-vis their competitors abroad because of decades of inward-looking policies and resultant concentration on the domestic market. They seek to over-compensate for this by demonstrating their export capability, though they know little about foreign markets. The result is that "too much enthusiasm without proper know-how often leads to disappointment for the buyers as well as manufacturer and the exporter".16

The unification of Germany has added to the fear that financial flows from Germany to India would decline. German assistance did decline from DM 435 million in 1991 to DM 340 million in 1995. The heavy cost of unity, estimated to be DM 180 billion per year, equal to half of Germany's total tax revenues, could be the chief reason.17 The report opportunity opened up in eastern Germany is also limited, since most of the market demand can be met by companies in western Germany. Only what western Germany is not able to supply is imported. India has been able to maintain her share of east German market only in exclusive goods which eastern Germany does not get from other markets, for example handicrafts, exclusively handmade carpets, spices, leather and manufactures, cotton textiles, and gems and jewellery. There is additional competition from Germany's neighbouring former communist countries, for example, Romania in leather products, and Hungary in textiles. Since 1990, Poland and Hungary have become eligible for duty-free

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16 Ibid., p.278.

preferential treatment for many products, which gives them a distinct advantage over India.

Germany also has a list of fairly comprehensive non-tariff trade barriers (NTBs). These include: quantitative restrictions, subsidies to domestic supply (both exports and imports), and cost imposed on imports. With this kind of protectionism arranged against them, Indian companies would suffer if their quality is not up to the standard. It is only the assurance of quality that would give them the crucial edge to competitiveness. Indian companies therefore need to enhance technology input, increase productivity and realize the benefits of producing to standards. Apropos, the following observation has been made regarding the non-competitiveness of India products:

More than often the quality of Indian products does not meet German requirements and prices are not in accordance with world market-standards, and often not competitive.19

Further detracting from the competitiveness of Indian companies are three other factors: (a) Indian exporters have a bad reputation as regards their honouring agreed contract terms, (b) Slow money transfers via the Indian banking system which is still not accustomed to the needs of a competitive market, and (c) lack professional marketing approach in Indian companies. Germany is a highly sophisticated and dynamic market where time and efficiency are at premium. In the German market, the customer is the king whereas in India the seller’s market still prevails.20

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20 Ibid.
To cater for the German market, Indian manufactures would need to realize this fundamental difference. They would be able to make their presence felt in the German market if only they take the following factors into account: (a) the product on offer should stand out as to quality (materials, finish), design and style, etc., (b) market trends keep constantly changing: demand, innovations and technical development determine consumers' preferences; hence they need to be innovative in marketing and distribution techniques; (c) in terms of know-how, capacities of supply, and honouring delivery schedules and payment conditions they need to maintain uncompromising standards. 21

India would have to pay special attention to "products management" and "marketing management". Productivity would have to be enhanced by scale expansion and reduction of cost. Low-value-added items would have to be replaced by higher-value-added products with innovative design. Aggressive marketing techniques would have to be adopted like intensive promotion of better quality products, a competitive commercial intelligence system and constant feedback mechanism from customers. 22 Marketing intelligence would have to take into account: 23 (a) the supply situation for special products in selected markets; (b) the structure of demand as reflected by influential groups of buyers and market segments; (c) prices paid at various levels by importers, whole salers, retail traders, etc.; (d) forecasts regarding the development, supply, demand and prices for the next

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22 Vijaya Katti, "Consequence of German Unification for India's Export", n.15, pp.131-50.

23 Kebschull, n.15, pp.276-84.
years; and (e) non-price factors which influence the purchasing decision, such as quality requirements, required technical and industrial standards, role of design and fashion, terms of payments. After careful market exploration and analysis, adjustment of products and production processes might be needed before a company starts activities for direct market access through visits to trade fairs, participation in trade exhibitions, establishing cooperation with agents and contracting buyers on individual basis. This may again generate feedback on production requirements and products design. Delivery schedules, transport, terms of payment, services, guarantees, etc. would have to be tied up. The final objective of all this striving should be a firm tie-up between the exporter and his foreign partner, considering that export promotion is directly connected with cooperation agreements and joint ventures.

In this regard, eastern Germany offers tremendous business opportunities and the potential to establish base. Different benefits awaiting investors in eastern Germany include: a highly skilled labour force, low wages, strong growth potential and extensive incentive programmes. At the same time, recognized, renovated units in eastern Germany are in a position to exploit the improved Indian market in the light of liberalized policy. The newly established trading houses in eastern Germany have expressed interest in direct business link with Indian exporters. The areas which provide investment opportunities for Indian firms include: the service sector (hotels, restaurants, etc.), construction industry, software, chemical and pharmaceutical industry, machine tools and trading houses.24 Leading Indian firms could also consider providing management expertise to eastern German companies. This would give them access to industries which in years to come would be a main powerhouse

to Europe.\textsuperscript{25} It needs to be kept in view that while the German market by itself is important enough, Germany also serves as a channel to neighbouring EC countries.

The German construction industry provides opportunities\textsuperscript{26} to various Indian industries simultaneously, such as hardware industry, steel industry, etc. There is also a strong upsurge in private consumption of electrical and electronic consumer goods in Germany. Modernization of infrastructure and of productive equipment in eastern Germany would result in considerable demand for investment goods. The plastics industry, metal construction, chemical industry, electrical engineering industry, mechanical engineering, etc. have also shown progressive recovery since 1994 and provide ample opportunities for Indian industries.

India's economic relations with Germany cannot be viewed in isolation of the EC/EU framework because "as market area Europe is quite homogeneous".\textsuperscript{27} In the wake of India's pervasive liberalization, India's trade with EU increased from 4578 million ECUs in 1991 to 7199 million ECUs in 1995, registering 10.47 per cent compound annual rate of growth. India's imports also have increased from 5,997 million ECUs in 1990 (before reforms) to 9943 million ECUs in 1995 exhibiting a similar growth of 10.26 per cent. India's trade deficit also increased from 461 million ECUs in 1990 to 1648 million ECUs in 1995, although it registered an all-time low of 348 million ECUS in 1993.

The EU's share in India's total exports has also moved up from 21.56 per cent in 1980-81 to 26.43 per cent in 1995-96. In comparison, the US share in the

\textsuperscript{25} Indo-German Economy, IGCC (New Delhi), vol.36, no.1, 1992.

\textsuperscript{26} Additional demand arose from ethnic Germans, eastern Germans and commitment of the West Germans to provide to retiring Russian troops \textit{Keesing's Record of World Events}, August 1991.

\textsuperscript{27} Christian Wilhelm, n.21, p.250.
same period increased from 11.08 per cent to 17.34 per cent. while that of Japan declined from 8.91 per cent to 6.96 per cent. In terms of India’s imports, the US share declined from 12.10 per cent in 1980-81 to 10.53 per cent in 1995-96, while the EU’s share climbed from 21.03 per cent to 26.81 per cent.28

The EU’s FDI flow to India, however, shows declining trend, from 67.47 per cent of India’s total FDI flow in 1981 to 18.64 per cent in 1996. Japan’s contribution also declined marginally from 5.93 per cent to 4.28 per cent whereas the US contribution increased from 20.60 per cent to 27.1 per cent 29 In actual figures, FDI from the EU increased from Rs.73.35 million in 1981 to Rs.54,821.5 million in 1995, that from the USA for Rs.22.4 million to Rs.70,543.7 million, and from Japan from Rs. 6.45 million to 15,142.6 million. The compound growth rate of FDI from the EU, the USA and Japan were 60 per cent per annum, 77.78 per cent and 74.08 per cent, respectively.30

The lukewarm EU urge to invest in India is attributed to the following factors: (a) volatility of Indian markets; (b) unstable political conditions; (c) lack of transparency; (d) discrimination between local and foreign investors; (e) not extending MFN status to foreign companies; (f) no freedom of choice in the areas of operation (g) absence of "level playing fields"; and (h) inadequate protection of intellectual property rights. The greatest hurdle, however, are the range of NTBs in Germany.


30 Chopra and Bhattacharya, n.28, p.22.
Though in the Final Act of the Uruguay Round, developed countries committed themselves to remove all NTBs and convert them into tariffs, in reality new forms of NTBs are surfacing in the EU to stop cheaper imports from the developing countries. Several studies show that almost 50 per cent of India's exports to EU have been subject to the Community NTBs. Also, the newly introduced social clause that sets standards for environment protection, human rights, labour standards and several other conditions related to labour and employment, hits Indian exports directly. Under the GSP scheme, the EC has already linked these NTBs with GSP facility. For instance, exports of Indian carpets to Germany have plummeted due to child labour issue. The EU makes it mandatory to put Rugmark or Kaleen for Indian carpet exports. Under the more recently introduced environmental standard, the EU has banned use of Azo dyes for Indian textile. Some other chemicals which are not eco-friendly have also been banned. It is also being apprehended that in the years to come anti-dumping duty will be used as a major trade restraining barrier in the EU to restrict cheaper imports from the third world countries. Non-transparency in defining anti-dumping duty is another discouraging factor.

There is, however, an encouraging note. During the five years of liberalization of its economy, India's penetration of the European market has improved from 0.98 per cent in 1990 to 1.28 per cent in 1994. As a result, India's

31 The existing tariff in the EU is hardly 3-4 per cent on an average as against 30 per cent of what prevails in India.

32 Chopra and Bhattacharya, n.28, p.22.

rank in the list of the suppliers to the EU has moved up from 25 in 1990 to 19 in 1994.\(^\text{34}\)

At the same time, however, India has not as yet succeeded in making its presence felt in any leading market, viz. the EU, the USA and Japan. Nor has it moved out of the groove of the traditional items of exports; and still further recipients of its supplies have remained the same over the years. In other words, there appears to have come about a kind of immobilism in India's economic and commercial transactions with the leading world economies.

TECHNIQUES OF MUTUAL LEARNING

After Chancellor Helmut Kohl's visit to Asia in early 1993, the German cabinet adopted a "Concept on Asia". It acknowledged the growing importance of the Asian countries and the Asia-Pacific region as a whole for German foreign policy. Within two days of the government's approval, the Asia-Pacific Committee (APC) was established. The APC involves close interaction of industry, trade, and the German bilateral chambers of commerce in Asia. It aims at overcoming the perceived under-representation of the German economy in the region which is now recognized as the main motor of economic growth in the world.\(^\text{35}\) On the urging of the German government, the European Commission published a paper entitled *Towards A New Strategy for Asia* in July 1994. It stated:

\[^{34}\text{A study by India's Trade Centre in Brussels shows that Indian products have gained a slightly improved market access during 1990-94. Chopra, n.28, p.10.}\]

\[^{35}\text{G. Krueger, n.1.}\]
If European companies are unable to take full share of Asian growth over the next decades this will affect their profits and competitiveness worldwide....

Besides outward investments into Asian countries, the Commission urges the EC/EU businesses and governments to open up more to Asian producers. Germany may be aware of Asia's promise, but it is also aware that it has not been the first to notice the opportunity. Japan and the USA have already made considerable headway in establishing themselves in Asia, and Germany will have to make up for lost time. Casting around for some window of opportunity to call their own, many German businesses are rediscovering one natural advantage they had all along, that is, India. Chancellor Helmut Kohl, in his visit to India in February 1993, stressed:

Great importance is being given to relations with India not only because of the long-standing indeed historical ties, but also because India is emerging as the largest market in the South East Asian region. He added:

Germany's economic policies are necessarily outward looking. Germany has to export to sustain itself. This is another important reason for giving the attention to the large market represented by India especially when India is rapidly opening up to the global economy.

The German Chancellor also took note of the interest shown by Indian entrepreneurs in setting up business ventures in eastern Germany. He welcomed this as a process which needed to be encouraged, since it would lead to an equilibrium in economic relations.

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The presence of German business in India dates back to well before their 'discovering' of Asia. The size of the sub-continent and its industrial base has long been recognized as an attractive market in its own right and a particular alchemy always seemed to be at work to make Germany one of India's preferred collaborators.\textsuperscript{38} The new era of liberalization has considerably added to India's appeal. What is now clearly generating enthusiasm among German industry is the growth of India's own trade with its Asian neighbours.

There is, at the same time, an apprehension that India would face strong competition from Eastern Europe for investible resources from Germany.\textsuperscript{39} Four of them, namely Poland, Hungary, Czech Republic and Slovak Republic have been admitted as associate members of the EC/EU. Germany also supports their inclusion in the EU, in the hope of bringing about increased economic and political stability in this traditionally sensitive region.\textsuperscript{40} For the time being, however, Eastern Europe has been on the backburner, as stated by the German Foreign Minister Klaus Kinkel,

\begin{quote}
The EU budgetary problems are on the increase. While EU politicians and the Commission have affirmed that these countries will ultimately become members of an expanded union, the current German attitude is that matter must now be put on hold.\textsuperscript{41}
\end{quote}

The date for the entry of these economies into the EU has therefore been postponed beyong AD 2000.

\textsuperscript{38} G. Krueger, n.1.

\textsuperscript{39} Eastern Europe attracted around DM 600 million (1990-93) compared to only DM 170 million for India.

\textsuperscript{40} Chopra and Bhattacharya, n.28, p.2.

Every major country engaged in modernizing its industrial system has to remain continuously in competition with some specific countries/regions. The EU is in competition with Japan and the USA. Germany is in competition with Japan, Canada, the USA and Switzerland. China is in competition with Japan and Russia. Similarly, India remains in critical competition with its northern large and powerful neighbour, China. The latter as a communist power and one of the major adversaries of the West, began its programme of "Four Modernizations" only in 1978 and pursued the path of "socialist market economy". India moved on to liberalization only in 1991, leaving no one in doubt about its conversion to capitalism. With its head start, China is far ahead of India in most areas: (a) Its GDP is almost double that of India; (b) Its per capita GNP at $540 is nearly double that of India; (c) It gets far more investments and technology inputs than India does; (d) In many conventional and non-conventional areas of trade, such as textile, engineering goods, electric and electronic equipment, it is ahead of India. As such, China has been a major magnet for western investment, and Germany in particular.

However, in the long term India has some significant advantages that China may not be able to match. First of all, India's market culture is organic to its society, and private enterprise has developed hand-in-hand with the Indian State, and not at its behest. Also, India's administrative, legal and democratic political structures are a major added point for long-term foreign investment. It is because of these reasons that India's traditional trade link with Germany has been acquiring new dimensions. For India, Germany is the gateway to Europe as nearly 26 per cent of India's trade with the EU is transacted with German firms, followed by UK, Belgium, Luxembourg and Italy. For the Indian companies which have made their entry into the German market, business with the rest of Europe is just round the corner. With its leading position in the EU and the high standards of its market Germany almost
guarantee them access to any of the world's sophisticated markets. In this context, it is encouraging that India's share in the global trade of Germany marginally increased from 0.88 per cent in 1990 to 1.20 per cent in 1995.\footnote{India's share in the global trade of EU increased marginally from 0.98 per cent (1990) to 1.36 per cent (1995); the USA, increased marginally from 1.29 per cent (1990) to 1.36 per cent (1995); Japan slightly declined from 1.47 per cent (1990) to 1.44 per cent (1995), Chopra and Bhattacharyya, n.28, pp.8-9.}