



31 January 2020

Australian Border Force
Department of Home Affairs
Via: humantraffickingandslavery@abf.gov.au

Dear Sir/Madam

Re. Feedback on the National Action Plan to Combat Modern Slavery 2020-24

The Minerals Council of Australia (MCA) appreciates the opportunity to provide feedback on the Australian Government's National Action Plan to Combat Modern Slavery 2020-24: Public Consultation Paper.

The MCA represents Australia's exploration, mining and minerals processing industry with MCA members representing the majority of national minerals production. Advancing responsible business practices through policy advocacy and practical support for members is an important part of this role.

The minerals industry commends the Australian Government's long-standing commitment to combat modern slavery wherever it occurs.¹ The MCA supported the enactment of Australia's world-leading *Modern Slavery Act 2018* and supports the government's intention to establish a Modern Slavery Act Expert Advisory Group in 2020.²

A long-standing commitment to uphold human rights

Australia's minerals industry recognises that respect for human rights is integral to responsible business practice.³ Principle 3 of *Enduring Value – The Australian Minerals Industry Framework for Sustainable Development* highlights the sector's long-standing commitment to uphold human rights.⁴

The minerals industry strongly supports the Sustainable Development Goals (SDGs), 17 interrelated goals to achieve a better life for all by 2030.⁵ While applicable to national governments, the SDGs are a shared framework for governments, civil society, the private sector, academia and other stakeholders to work together to achieve sustainability priorities, among which is combatting modern slavery. SDG8: Decent work and economic growth includes a specific target (8.7) to take immediate action to end modern slavery.⁶

MCA has been actively supporting members to prepare for reporting obligations under Australia's *Modern Slavery Act 2018*. In doing so, the MCA sought to further understand the practical complexities associated with reporting and broader approaches to modern slavery due diligence and remedy.

¹ Department of Home Affairs, [Draft National Action Plan to Combat Modern Slavery 2020-24: Public Consultation Paper](#), Australian Border Force, Canberra, 2019, p. 2/

² J. Wood MP (Assistant Minister for Customs, Community Safety and Multicultural Affairs), *National Roundtable on Human Trafficking and Slavery*, Department of Home Affairs, Canberra, 4 December 2019.

³ MCA position is consistent with the United Nations Guiding Principles on Business and Human Rights.

⁴ Minerals Council of Australia, [Enduring Value – Australian Minerals Industry Framework for Sustainable Development](#), MCA, Canberra, 2015, p. 7.

⁵ Cardno International Development, [Sustainability in Action: Australian Mining and the Sustainable Development Goals](#), report for the Minerals Council of Australia, Australia, 2018, p. 6.

⁶ United Nations, Sustainable Development Goals Knowledge Platform, [Sustainable Development Goal 8](#), UN, viewed 18 December 2019.

Industry engagement with civil society, government and other experts has reinforced the importance of meaningful and long-term multi-sector collaboration to combat modern slavery. Insights from this engagement have informed the following feedback on the proposed 2020-24 National Action Plan.

2020-24 National Action Plan

The MCA supports the proposed whole-of-community perspective provided in the 2020-24 plan would support an effective government response. Furthermore, the MCA supports the government's commitment to ensure the voices of modern slavery survivors inform the government's approach and forward priorities. Facilitating opportunities for multi-stakeholder dialogue and collaboration will also be essential. Given this, the MCA proposes the following changes to enhance the proposed 12 goals (added text in bold):⁷

- **Goal 2:** Engage the Australian community to understand and combat modern slavery, **including raising awareness of support available for modern slavery survivors.** Recent MCA engagement highlighted the importance of increasing awareness of how to best respond to potential instances of modern slavery, including how to connect survivors to appropriate support.
- **Goal 9:** Promote **collaboration**, transparency and accountability to combat modern slavery risks in global supply chains, including in Government procurement. Multi-stakeholder and cross-sectoral collaboration supports continuous improvement in modern slavery due diligence, including reporting. The Modern Slavery Business Engagement Unit's 2019 international conference provided a valuable forum for shared learning and collaboration.
- **Goal 11:** Enhance our leadership and partnerships to promote **national**, regional and international cooperation to combat modern slavery. This reflects the benefits of further multi-sector cooperation to advance domestic as well as regional and international responses.
- **Goal 12:** Work collaboratively across **governments**, along with non-government stakeholders, to combat modern slavery. Alignment of state and national modern slavery reporting frameworks provides important consistency. Non-government stakeholders should include the private sector, academia and civil society to support a whole-of-community response.

The MCA considers the Australian Government UN Sustainable Development Goal reporting platform may provide an appropriate central point to report on progress against 2020-24 plan targets.

Further engagement and information

The MCA works to engage collaboratively and openly to advance responsible business practices in Australia's minerals industry, and share learnings across the private sector more broadly. Accordingly, the MCA would welcome further opportunities to provide practical and constructive input to the 2020-24 National Action Plan, including the development of supporting metrics.

For further information regarding this submission, please do not hesitate to contact Jillian D'Urso, Manager – Social Policy on 03 8614 1851 or jillian.durso@minerals.org.au.

Yours sincerely



CHRIS MCCOMBE
GENERAL MANAGER SUSTAINABILITY

⁷ Department of Home Affairs, [Draft National Action Plan to Combat Modern Slavery 2020-24: Public Consultation Paper](#), Australian Border Force, Canberra, 2019, p. 3.