

## About FECCA

The Federation of Ethnic Communities' Councils of Australia (FECCA) is the national peak body for all migrant organisations in Australia. FECCA undertakes policy analysis and submissions, advocacy and conducts national Access and Equity consultations. FECCA advocates for social justice and harmony and against all forms of discrimination of behalf of all Australians.

FECCA has a representative structure with membership of state and regional councils. It has a national Executive Committee and a secretariat as well as several policy sub committees including New and Emerging Communities, rural and regional, women and youth.

## Submission to Clean Energy Legislation Package

*Social equity and economic progress are thus combined with environmental protection as three pillars of sustainability. As the three pillars are interlinked dimensions of sustainable development, they need to be present together; one dimension cannot compensate for the other at the cost of failing to attain sustainability in the long term.<sup>1</sup>*

*Equity and fairness should be considered in the development, implementation and review of climate change policies. The application of climate change mitigation policy may have differential impacts across socio-economic groups, regions, market participants or sectors of the economy. Intergenerational equity is also an important consideration in assessing the fairness of adjustment cost. Consideration of the equity of*

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<sup>1</sup> Peter May<sup>I</sup>, Emily Boyd<sup>II</sup>, Manyu Chang<sup>III</sup> and Fernando C. Veiga Neto,<sup>IV</sup> "Incorporating sustainable development into carbon forest projects in Brazil and Bolivia," *Estudos Sociedade e Agricultura*, vol.1 no.56 Rio de Janeiro 2005 accessed at [http://socialsciences.scielo.org/scielo.php?script=sci\\_pdf&pid=S1413-05802005000100005&lng=en&nrm=iso&tlng=en](http://socialsciences.scielo.org/scielo.php?script=sci_pdf&pid=S1413-05802005000100005&lng=en&nrm=iso&tlng=en) on 22 August 2011, p.3

*measures will involve ensuring that those most needing help to adjust are assisted fairly and in a well targeted manner. Perverse outcomes should be avoided. Equity will also be an important prism through which the Authority should consider the impact on households, business and communities.* <sup>2</sup>

FECCA commends the government's resolve to act in the face of climate change. We believe that climate change is a significant challenge to Australia and that we will need considered and inclusive measures to deal with this.

We concur with accepted views in this regard that it is not simply an economic and environmental challenge, but one of sustainability in its broadest sense, which includes social factors.

Australia's migrant communities include many who face particular issues including issues around lack of English language, lack of Australian work experience and recognised skills and qualifications and difficult migration experiences including torture and trauma. These circumstances can create barriers to access employment and support services and thus create issues around equity and social inclusion for these communities. On the other hand, many migrant communities also have skills that are of particular value in terms of the climate change measures in Australia. Our submission is made taking these circumstances into account.

In responding to the draft legislation, FECCA has focused on areas where we have expertise and which are of relevance to our constituents. To this end we have focused on the main bill, which is the Clean Energy Bill 2011, and the Climate Change Authority Bill 2011 and on their respective commentaries.

We make the following points:

1. FECCA notes that in setting out the context for this important legislation, while key economic, scientific and environmental factors are identified, there is little attention paid to social aspects

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<sup>2</sup> Climate Change Authority Bill 2011, p.17

of sustainability. It is important that the holistic framework for sustainability is set out at the very outset in strong terms. For example, in the Commentary to the Clean Energy Bill 2011 in the Chapter “Policy Context” (p.9), there is an opportunity to set out the overarching “pillars” of sustainability as economic, environmental and social. While the Commentary on Climate Change Authority Bill 2011 specifically draws attention to social justice issues such as equity and public interest as paramount (see third quote above), these sentiments are not supported by the preamble to the main bill or by its commentary.

2. We note that social inclusion considerations are not adequately considered in the main Clean Energy Bill 2011. For example, there is reference to a targeted measure under Land Sector Initiative (Clean Energy Bill 2011 p 17) where Indigenous Australians are mentioned. FECCA commends this focus and welcomes the recognition accorded to our First Australians. In a similar way, CALD Australians and Australians from refugee backgrounds have specific circumstances, needs and expertise which also need to be both addressed and harnessed in order to ensure the participation of all Australians in an equitable manner.
3. **In view of the above points, FECCA recommends that the intersection of climate change measures with other key social policy measures such as the Social Inclusion policy should be reflected structurally in the implementation and administration of the current suite of legislative measures.** Implementation has to clearly locate social inclusion responsibility at corporate, government, individual and community levels. These measures could include terms around corporate responsibility, stakeholder engagement and capturing and measuring social impact outcomes.
4. FECCA notes that both bills we have discussed can more effectively include collaborative governance mechanisms. This can be done in the first instance through the Productivity Commission review processes (10.17 and 10.18 in the Clean Energy Bill 2011) where under governance and administration there can be specific terms of

reference which will evaluate and measure the social impact of the measures, including specific measures related to cultural diversity. This could also be more broadly captured in the Climate Change Authority's (Climate Change Authority Bill 2011 1.5 , 1.6 and 1.7) functions in terms of involving stakeholders and communities in garnering feedback about the social impacts and to include these in forward plans. As part of the statutory authority's research brief, social sustainability should be scoped by using existing frameworks such as the European Union's Sustainable Development Strategy (SDS) principles.<sup>3</sup>

5. While the Carbon Farming Initiative is not part of this exposure, FECCA acknowledges that this could arguably be the most significant development for many migrant Australians due to the current policy initiatives to relocate new arrivals to rural and regional centres in Australia. Migrant settlement in rural and regional areas is a key strategy of rural and regional development measures in the current budget. The land carbon initiatives offer broad opportunities for such communities, provided there are targeted and structured measures to include them. To this end, **FECCA calls for adequate representation of CALD perspectives on the Land Sector Carbon and Biodiversity board (Climate Change Authority Bill 2011 2.1) to ensure that initiatives in this arena related to training, research and employment are targeted to include migrant settlements and communities.**
6. The Household Assistance part of the legislation is not part of this exposure. FECCA notes that this would be an important area for considering CALD Australians as many of them are amongst the most vulnerable people in Australia. FECCA will work with our constituents very closely to monitor the effects of the implementation of this legislation.

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<sup>3</sup> Christopher Degryse and Philippe Pochet, "Paradigm shift :social justice as a prerequisite for sustainable development" Working Paper 2009.02, European Trade Union Institute accessed at <http://www.globalcitizen.net/Data/Pages/1364/Papers/2009061811259533.pdf> <http://ec.europa.eu/environment/eussd/> on 23 August 2011, p13-14

7. There are additional significant issues around targeted and culturally appropriate information provision and targeted retraining and reskilling opportunities that would be specific issues for CALD Australians. Lack of English language proficiency is a strong barrier to social inclusion for many CALD Australians and this creates inequity in access to government support services and opportunities. These broad but significant issues have to be considered in the implementation of the legislation particularly in terms of communication strategies and inclusive and targeted stakeholder engagement measures.

## **Conclusion**

The principles as set out in the main bill are that any measures to respond to climate change should:

- *be economically efficient, environmentally effective, equitable and in the public interest; and*
- *take account of the impact on households, business and communities; and*
- *support the development of an effective global response to climate change; and*
- *be consistent with Australia's foreign policy and trade objectives.*<sup>4</sup>

To achieve the social justice outcomes of the first two points, social inclusion considerations would need to become a core structure of this legislation. While there is recognition of “structural adjustment initiatives”<sup>5</sup> social inclusion needs stronger and core recognition. This would ensure that the talents, aspirations and needs of nearly half of Australia’s population who would consider themselves “culturally diverse” can be embraced by this important legislation.

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<sup>4</sup> Commentary on the Climate Change Authority Bill 2011 p 22

<sup>5</sup> Ibid p 23

## References

### Primary resources

1. Clean Energy Bill 2011
2. Climate Change Authority Bill 2011
3. Commentary on Clean Energy Bill 2011
4. Commentary of Climate Change Authority Bill 2011
5. Federation of Ethnic Communities' Councils of Australia, "Quest for a Level Playing Field: FECCA's National Access and Equity Consultations 2010-2011" unpublished report

### Secondary sources

1. Degryse, Christopher and Philippe Pochet, "Paradigm shift :social justice as a prerequisite for sustainable development" Working Paper 2009.02, European Trade Union Institute accessed at <http://www.globalcitizen.net/Data/Pages/1364/Papers/2009061811259533.pdf> <http://ec.europa.eu/environment/eussd/> on 23 August 2011.
2. May Peter<sup>I</sup>, Emily Boyd<sup>II</sup>, Manyu Chang<sup>III</sup> and Fernando C. Veiga Neto<sup>IV</sup> "Incorporating sustainable development into carbon forest projects in Brazil and Bolivia," Estudos Sociedade e Agricultura, vol.1 no.se Rio de Janeiro 2005 accessed at [http://socialsciences.scielo.org/scielo.php?script=sci\\_pdf&pid=S1413-05802005000100005&lng=en&nrm=iso&tlng=en](http://socialsciences.scielo.org/scielo.php?script=sci_pdf&pid=S1413-05802005000100005&lng=en&nrm=iso&tlng=en) on 22 August 2011.