



Archdiocese of Wellington

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Submission of The Ecology Justice and Peace Commission Social Equity Committee of the Catholic Archdiocese of Wellington on the Modern Slavery Bill

“We declare on behalf of those who are calling our communities to action, that every systematic deprivation of individual freedom for the purpose of personal and commercial exploitation be rejected entirely and without exception.”

Pope Francis, December 2014, Ceremony for the Signing of the Faith Leaders' Universal Declaration against Slavery

1. Introduction

The Wellington Catholic Archdiocese Commission for Ecology, Justice and Peace is established to contribute to and participate in work for justice and peace inspired and informed by Catholic Social Teaching.

The Commission's key responsibilities are:

- Supporting the communities of the Archdiocese and wider community to hear and actively respond to the cry of the earth and the cry of the poor;
- Scrutinising all issues and institutions in society and in the Archdiocese in the light of Catholic social teaching

These Catholic social teaching principles are broadly shared by many others, regardless of religious background.

We support this Bill as a step towards upholding the dignity of workers across global supply chains. However, in its current form, the Bill does not do enough to address slavery within the supply chains. We address these in turn.

2. Reporting obligations

The Bill as drafted only requires reporting entities' obligations to publish modern slavery statements on their websites, and submit them for publication on a register. Reporting alone risks becoming an administrative tick box exercise. There is no requirement for reporting entities to act in response to findings on modern slavery or mitigate these risks. We encourage adding such a requirement that reporting entities must act in response to modern slavery in its operations and supply chains and take action to address, mitigate and prevent those risks. These requirements of active due diligence are the requirement under both models in both Australia and the European Union.

3. Applicable threshold

Currently, revenue of more than \$100 million in a reporting period is the threshold applicable for the reporting obligation to apply. In the New Zealand context, this excludes most businesses. We believe the responsibility to mitigate modern slavery should be held by all, not just very large companies.

4. Oversight

The Bill currently asserts “The Minister may direct the Chief Human Rights Commissioner to designate modern slavery as a priority area.” We believe this is insufficient and suggest an independent body that can oversee the legislation and support entities to undertake due diligence on modern slavery in their supply chains.

5. Conclusion

As currently drafted, this Bill misses an opportunity to uphold the dignity of workers. For legislation to be effective, the Modern Slavery Bill should go beyond mere reporting requirements and require meaningful due diligence and action to prevent and address modern slavery risks in a supply chain. Strengthening these areas would better reflect New Zealand’s commitment to justice and human rights. We have this responsibility to each other.