Working with Women Alliance

Department of Industry, Science and Resources

Via Email: CBPconsultation@industry.gov.au

Submission to the Community Benefit Principles consultation.

To the Department,

The Working with Women Alliance (WwWA) welcomes the opportunity to provide feedback on the *Future Made in Australia Community Benefit Principles*.

The *Future Made in Australia* agenda represents an important opportunity to foster economic resilience and shared national prosperity. To achieve this promise, it must also deliver for those whose potential is currently underutilised. For example, many women are clustered in short-term, casual, and insecure roles. Caring responsibilities and health conditions remain the main barriers to women being able to participate in the workforce.[i] Further, almost half of permanent migrants currently work below their skill level.[ii] If these approximately 620,000 workers were employed to their full capacity, Australia's economy could gain an estimated $9 billion annually, or $70 billion over ten years.[iii] Similarly, only 20% of women with disability are employed full-time compared to 48% of women without disability.[iv] Addressing the barriers that keep these women from well-paid, secure work is therefore fundamental to achieving genuine community benefit.

Our response highlights four key areas where the proposed *Community Benefit Principles* could be strengthened to deliver meaningful and equitable community outcomes.

Genuine and Resourced Community Engagement

WwWA commends the intention to engage collaboratively with local communities, as outlined under Community Principle 3. However, meaningful engagement often imposes time and staffing costs on individuals and organisations that are already under-resourced. The guidance should therefore include a funding mechanism to ensure appropriate recognition and compensation for participation.

Community consultation must be genuine, continuous, and transparent. We have heard from our members that too often, expert advisory panels that are established at the outset of a project have very little follow-up or feedback about how community input has informed outcomes. We recommend utilising existing frameworks such as local councils, land councils and Elders' groups to ensure continuous engagement. Reporting requirements on engagement should clearly specify who is being consulted and why, to ensure intersectional and representative participation.

Balancing Benefit and Accountability

While WwWA supports consequences for non-compliance, we caution against unintended consequences for communities that stand to benefit from projects. Funding withdrawals or delays caused by proponent non-compliance should not disadvantage local communities through loss of investment, jobs, or infrastructure opportunities.

We also recommend simplifying the current framework by consolidating the threshold and minimum requirements into a single, consistent set of obligations for all proponents. Within that, all proponents, regardless of funding levels, should publish their *Future Made in Australia* plans and report annually on progress. Independent assessments - conducted by a neutral third party such as the Australian National Audit Office or a specialised panel of community and industry experts - should evaluate both compliance and tangible outcomes, including local employment targets and delivery of training opportunities.

Inclusive Targets and Structural Barriers

In recognising that gender segregation in Australia's workforce is driven by several linked and self-reinforcing factors, proponents should be required to identify and address the structural barriers – beyond training – that limit women's participation - such as safety, flexible work, childcare access, and workplace culture. A whole-of-community approach, along with investment in enabling infrastructure, is essential to ensuring that equality objectives are achievable in practice.

Under the current draft, only First Nations employment targets are specified in the minimum requirements. To better align with Community Principle 2, WwWA urges extending targets to other underrepresented groups, including women, culturally and linguistically diverse communities, and people with disability. We also support location specific and place-based targets. For example, a 4% target for First Nations employment is not adequate in locations where more than 4% of the population is Aboriginal and/or Torres Strait Islander. Further, proponents must be encouraged, through the use of targets or requirements, to ensure that local residents are prioritised for employment wherever possible.

Alignment with Gender Equality Standards

It is an important step forward that project proponents must not be listed as non-compliant by WGEA under Community Principle 2. However, further clarity is needed on how this requirement will apply to small and medium businesses that are not currently required to report to WGEA. More detail is also needed on the process for managing proponents who may become non-compliant after project commencement. Additionally, requirements based on "current sector and industry averages" risk reinforcing systemic inequities, as these standards are known to disadvantage women in many industries, particularly construction, engineering and other sectors that are likely to dominate proponents. Rather than replicating existing disparities, this requirement should set a forward-looking benchmark for equality and inclusion, possibly based on data from Jobs and Skills Australia's Gender Economic Equality Study.

The *Future Made in Australia* agenda provides a key window to embed gender equality and inclusion into Australia's economic transformation. Ensuring that women and underrepresented groups can fully contribute to - and benefit from - these investments will not only strengthen Australia's social fabric but also drive greater economic performance.

We thank the Department for the opportunity to provide feedback and look forward to continued collaboration on these key reforms.

Yours sincerely,

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[i] ABS, 2024, *Caring for children and health still the main reasons women and men are unavailable for work,* https://www.abs.gov.au/media-centre/media-releases/caring-children-and-health-still-main-reasons-women-and-men-are-unavailable-work

[ii] Lily Jiang and Tri Nguyen, 2024, *Skilled ready A blueprint for activating Australia's overseas-trained workforce,* Activate Skills Australia, https://www.ssi.org.au/wp-content/uploads/2024/10/Activate-Australia-Skills-Blueprint-for-Reform-Oct-2024.pdf

[iii] ibid.

[iv] European Disability Forum, 2022, *Disability and gender gaps: Addressing unequal employment of women with disabilities,* https://www.edf-feph.org/content/uploads/2022/09/EDF recommendations-on-employment-of-women-with-disabilities-September-2022-final.pdf