



Retail Supply Chain Alliance

# Department of Home Affairs: Review of Regional Migration Settings

Submission of The Australian Workers' Union and the Retail Supply Chain Alliance

August 2024

## Introduction

The Australian Workers' Union (AWU) is one of Australia's largest unions. We represent around 76,000 workers nationally - and with tens of thousands of members in regional areas, the AWU is the union for regional Australia. The AWU's membership includes thousands of workers in agriculture, especially horticulture and meat processing. This diverse workforce counts citizens, members of the Pacific Australia Labour Mobility (PALM) Scheme and other migrant cohorts among its ranks.

The Retail Supply Chain Alliance (RSCA) is a joint initiative between the AWU, the Transport Workers' Union and the Shop Distributive & Allied Employees Association. The RSCA represents and advocates for workers in every facet of Australia's horticulture supply chain – supporting fairness from the farm to the shopfront. The alliance was formed in 2019 with the principal goal of ending worker exploitation in this supply chain.

The RSCA welcomes the Commonwealth's review of regional migration settings, as well as the wider discussion around the migrant worker experience. We are attuned to the very real problems facing agricultural industries - including labour shortages, changing climates, more frequent and severe disasters, market pressures, inflation, and a housing crisis driven partly by 'tree change' migration to regional centres.<sup>1</sup> We are also witness to the often-hidden daily reality for many agriculture workers - prominently including exploitation of vulnerable migrants. This is the focus of our submission to the review.

In particular, the RSCA is a staunch advocate for PALM workers. Its PALM members primarily work in horticulture and the meat trade. They come to Australia for periods of between nine months and four years - filling major labour supply gaps, increasing sectoral productivity and helping feed millions of Australians. As their work largely occurs in inherently regional industries, most of the RSCA's PALM members live and work in regional Australia.

The current PALM Scheme represents a major step forward in addressing worker vulnerability and employer exploitation in agriculture. Recent changes to the PALM Deed and Guidelines, implemented between July 2023 and July 2024, provided significant guardrails to help prevent many of the most egregious forms of exploitation seen in the sector. These include award wages being undermined by large and unnecessary deductions, excessive downtime blamed on weather and other factors, and a power imbalance that allows coercive control by employers to run rampant.<sup>2</sup>

The RSCA understands the need for a balanced approach to regional migration settings – one which countenances worker protection as well as the needs of regional industries, as well as community cohesion. In our view, the current structure of the Working Holiday Maker (WHM) program and visa represents a major obstacle to advancing these goals. The program allows the undercutting of wages and conditions and drives down productivity in the agriculture sector. It also increases the churn of very-short term workers through regional areas. Supporting strong and sustainable regions thus requires significant reform to the WHM program, and further expansion and support for the PALM Scheme, as a matter of priority.

The following lays out the RSCA's position in detail and in reference to the discussion paper supporting the review.

Doing better by migrant workers means doing better for regional Australia. We welcome the opportunity to work with the Commonwealth to this end.

### Summary of recommendations

- 1:** The Commonwealth should reform the Working Holiday Maker program to ensure it is not used as a major and permanent labour source by the Australian agriculture industry.
- 2:** The Commonwealth should abolish specified work requirements pertaining to agriculture under the Working Holiday Maker program.
- 3:** In the alternative to Recommendation 2, the Commonwealth should abolish 'plant and animal cultivation' from the Working Holiday Maker program's specified work requirements.
- 4:** In the alternative to Recommendations 2 and 3, the Commonwealth should deliver a regulatory framework for Working Holiday Maker visa-holders working in agriculture, equivalent to the PALM Scheme's Deed and Guidelines.
- 5:** The Commonwealth should track and analyse the work locations and industries of UK citizens in Australia under a Working Holiday Maker visa.
- 6:** The Commonwealth should conduct regular, recurrent and tripartite reviews of the Working Holiday Maker program.
- 7:** The Commonwealth should reform the PALM Scheme to support workers to move between approved employers without the need for consent from either their current employer or the Commonwealth.
- 8:** The Government should develop and maintain a public database of available PALM workers in-country and approved employers requiring additional labour.

### Summary of findings

- 1:** Agriculture employers have relied heavily on the Working Holiday Maker program since the introduction of specified work requirements - especially prior to the introduction of the PALM Scheme.
- 2:** Employers' reliance on the Working Holiday Maker program reflects, in part, its utility as a tool to suppress labour costs and undercut workers' conditions.
- 3:** The PALM scheme is a viable alternative labour source to, and supports higher productivity than, the Working Holiday Maker program.
- 4:** Exploitation of vulnerable migrant workers in agriculture and elsewhere is a systemic issue, and has been well documented by government, academic and other sources over several years.
- 5:** Addressing exploitation of vulnerable migrant workers in agriculture requires a targeted regulatory response from government.
- 6:** The PALM Scheme represents an appropriate regulatory response to addressing and managing exploitation of migrant workers in agriculture. This is not reflected in the Working Holiday Maker program.

## Development and implementation of the Working Holiday Maker program and PALM Scheme

The Working Holiday Maker (WHM) program and visa was introduced in 1975 - originally for residents of the UK, Ireland and Canada only.<sup>3</sup> The scheme was launched as:

*"...a cultural exchange program to enhance Australia's international standing and bilateral links with partner countries and regions. The program was created to provide opportunities for young people to travel and undertake short-term work or study to supplement their holiday experience."*<sup>4</sup>

Between 1980 and 2006, the scheme was gradually expanded as other countries showed interest in participating due to Australia's strong bilateral relationships and its reputation as a safe and rewarding tourist destination. Officially, the program has always been intended as a cultural exchange mechanism. It offers holidaymakers the opportunity to take up lower-skilled, temporary work to subsidise their Australian travel experience of travel.

In reality, the implementation of specified work requirements for subsequent WHM visas from 2006 onwards<sup>5</sup> brought comprehensive change to the scheme. What was once a program designed to advance people-to-people links and mutual cultural literacy has increasingly been used as a blunt and regressive tool of industrial relations. Too often, young people seeking the promise of more time in Australia have been exploited in the name of driving down wages and conditions in agriculture.

### Reliance on WHM visas to meet labour shortages in agriculture

As early as 2009, it was obvious the WHM program had become a major source of labour in the agriculture sector.<sup>6</sup> Due to the difficult nature of much agricultural work, employers sought a new source to meet labour shortages. As one expert report noted at the time:

*"Many employers have claimed that it is difficult to attract young workers or keep existing tradespersons in the horticultural industry. This is mainly due to the hard physical nature of the work and the low pay compared with other jobs. Also, employers have found it difficult to find suitable applicants for the positions because of their lack of qualifications, their lack of experience, or their poor work ethic..."*<sup>7</sup>

The sector came to rely on the WHM program to this end - not as an occasional solution to intermittent shortages but as a permanent and ongoing source of labour. Reliance was especially great during peak harvest seasons. A 2021 Flinders University study reflects the extent to which the industry depended on the program. A survey of agriculture employers included in the study found that four in five characterised WHM workers as 'very important', with a further 14.3% describing them as 'important'.<sup>8</sup>

But the WHM program's increasing popularity was never just about supporting businesses in the legitimate pursuit of workers to meet labour shortages. Working holidaymakers form part of a cohort that has repeatedly been identified as highly vulnerable to employer exploitation (see below). The WHM program offers no dedicated protections to mitigate this exploitation risk. It has thus been used by unscrupulous employers to keep workers' pay and conditions below legal minimums and community expectations.

COVID era border closures and the subsequent repatriation of many WHM visa holders temporarily upended this reliance. By September 2020, Australian farmers were staring down the barrel of major labour shortages for upcoming harvests, with government scrambling to deliver an alternative:

*"Australia's fruit and vegetable farmers need an extra 26,000 workers to harvest their crops this summer, according to new research illustrating the impact of coronavirus border closures on farm labour...[Then-]Prime Minister Scott Morrison said he was open to soon expanding the seasonal and Pacific worker programs..."<sup>9</sup>*

The government’s solution came in the form of the PALM Scheme - coming, as it did, from the former Seasonal Worker Programme and Pacific Labour Scheme. As border closures subsided and a post-COVID normality ensued, the PALM Scheme emerged as a major labour source in agriculture and especially horticulture. There was a large and rapid increase in the size of the PALM workforce from 2021 to 2023, with agriculture the largest recipient industry:

Time Period	Seasonal Program (SWP / PALM Short-term)	Longer-Term Program (PLS / PALM Longer-term)	Total
2020-21	10,149	2,952	13,101
2021-22	15,676	8,462	24,138
2022-23	26,054	13,590	39,644
<b>Total</b>	<b>51,879</b>	<b>25,004</b>	<b>76,883</b>

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Despite its own issues, particularly in its early incarnations, reforms to the PALM Scheme have made it well equipped to ensure workers’ treatment meets the standards of the law and the expectations of the community. This stands in marked contrast to the WHM program, which has been left virtually untouched (see below).

As the discussion paper acknowledges, PALM workers have also shown themselves to be vastly more productive than working holidaymakers.<sup>11</sup>

Today, the PALM Scheme provides a similar number of agriculture workers as the WHM program<sup>12</sup> - reflecting its capacity to reliably meet labour shortages in regional Australia. Moreover, the scheme is far from operating at capacity. There is strong ongoing demand from Pacific and Timorese workers for additional places, as well as ample capacity in sender economies to accommodate its further expansion.<sup>13</sup>

In all, the PALM Scheme is unquestionably a viable and indeed superior alternative to the WHM program in agriculture. Indeed, a chasm has opened between the well-regulated and efficient PALM Scheme and the unreconstructed WHM program. The WHM program now risks undermining real progress for agriculture workers driven by the PALM Scheme in the post-COVID era.

**Finding 1:** Agriculture employers have relied heavily on the Working Holiday Maker program since the introduction of specified work requirements - especially prior to the introduction of the PALM Scheme.

**Finding 2:** Employers’ reliance on the Working Holiday Maker program reflects, in part, its utility as a tool to suppress labour costs and undercut workers’ conditions.

**Finding 3:** The PALM scheme is a viable alternative labour source to, and supports higher productivity than, the Working Holiday Maker program.

## Migrant worker exploitation: Pervasive, systemic and very well documented

Migration has long played a role in Australia's agriculture workforce. The AWU has repeatedly outlined in submissions to government its serious concerns around widespread instances of migrant worker exploitation in these industries.

These concerns cannot be chalked up to 'a few bad apples' in the form of rogue operators, as the industry has sometimes sought to do.<sup>14</sup> Rather, they relate to deep structural and regulatory issues that allow exploitation to occur. In short, migrant workers in agriculture typically have little to no knowledge of Australian industrial relations, are young and inexperienced in the workplace, and possess few connections in-country - alongside various other vulnerabilities. Outside of the PALM Scheme, they also enjoy no dedicated protections from government to help mitigate these issues. This is very well documented. At least 13 reports published in recent years have found that migrants in the agriculture sector are routinely exploited:

### Bad apples or rotten to the core? Reports on migrant worker exploitation in agriculture

It is often claimed that a small number of unscrupulous agriculture employers fail to provide a working environment that meets legal requirements or community expectations. But countless reports have shown the opposite: The exploitation and abuse of workers has become standard business practice in a very large number of Australian farms. The below lists reports, including government and employers' own investigations, that detail the systemic abuse of migrant workers:

- The Grattan Institute's ['Short-changed' paper](#), published in 2023, found *"Recent migrants are at higher risk of exploitation because they tend to be younger, have less experience, and work in industries where exploitation is common."* It further stated, *"Migrants also face particular threats that relate to their migrant status, such as racism and discrimination, having their passports confiscated, being reported to the Department of Home Affairs, or being forced to pay an employer or middleman..."*
- A 2022 [report](#) commissioned by the RSCA and Coles observed that seasonal farm workers were often crammed into overcrowded share houses and shipping containers at exorbitant prices.
- The Commonwealth's [National Agricultural Workforce Strategy](#), published in 2021, found *"dependence on an overseas seasonal and transient workforce is one of the biggest issues faced by a number of developed countries"* in the sector, and that *"using low-cost labour is... a highly risky option."*
- The McKell Institute's 2020 ['Blue Harvest' report](#) found that some blueberry pickers were paid as little as \$4 a bucket, while others earned just \$3 an hour. The Institute found that workers are set up to be exploited, that wage theft is a business model in the horticulture sector, and that workers are coerced into a culture of silence.
- A Unions NSW Report titled ['Wage Theft: The Shadow Market'](#), also published in 2020, concluded that 96% of advertised rates in horticulture would not allow a worker to earn the national minimum wage, and that 65% of ads for strawberry picking and 22% for grape picking would allow workers to earn less than \$2 an hour.
- In 2019, the Commonwealth's Migrant Workers' Taskforce [reported](#) that *"unscrupulous employers...blatantly breach the law"* and *"it is clear that a significant proportion of temporary visa holders in Australia are being exploited."*

- A [2019 report](#) commissioned by growers' organisations Vegetables WA and the West Australian Strawberries Association identified "*widespread*" exploitation of migrant workers, and that workers on rates generally earn less than \$15 an hour (with many earning much less).
- The Fair Work Ombudsman's ['Harvest Trail' Inquiry](#), reporting in 2018, found a "*culture of non-compliance*" in the industry, with more than half of investigated employers failing to adhere to workplace laws.
- A university-led [temporary migrant work survey](#), canvassing 4,322 migrant workers in 2017, found that one in seven earned \$5 per hour or less, and one in three earned \$10 per hour or less.
- Australian Parliament's 2017 [Inquiry into establishing a Modern Slavery Act](#) noted "*unscrupulous labour hire companies [contribute] to the exploitation of migrant workers.*" The Committee expressed concern at the high number of case studies detailing exploitation and abuse.
- An in-depth [investigation](#) by The Sydney Morning Herald, published in 2016, said "*There is enough evidence to say that [exploitation] is systemic*" and "*Significant numbers [of migrant workers] are really exploited.*"
- [A 2015 study](#) on temporary migrant workers from Deakin University stated that "*employers take advantage of these variations in vulnerability to find the weakest workers and the most exploitative contracting arrangements and payment systems*", and "*Without enforceable minimum standards of employment, other employers are then forced to follow suit, producing a downward spiral of wages and employment conditions.*"
- The Commonwealth's 2010 [Review of the Migration Amendment \(Employer Sanctions\) Act 2007](#)<sup>1</sup> identified "*deliberate and systematic use of [migrant] workers in significant numbers*", and undocumented workers "*underpaid, misled about what they are doing, undernourished, beaten and threatened.*"

This litany of findings direct any reasonable analysis towards the same conclusion as has driven reform to the PALM Scheme. That is, many migrant workers - including working holidaymakers - are made acutely vulnerable by virtue of their circumstances. Addressing the widespread exploitation that stems from this vulnerability requires a strong regulatory hand from government.

**Finding 4:** Exploitation of vulnerable migrant workers in agriculture and elsewhere is a systemic issue, and has been well documented by government, academic and other sources over several years.

**Finding 5:** Addressing exploitation of vulnerable migrant workers in agriculture requires a targeted regulatory response from government.

### Positive reform in the PALM Scheme as the WHM program stood still

The PALM Scheme that emerged from the COVID closures period has been tailored to deliver effective employment standards and safeguards for the agriculture workers that it supports. The scheme has the explicit intent of advancing international development and geostrategic objectives, as well as meeting labour shortages in Australia. This makes it better suited to providing labour in challenging industries and environments than the WHM program. The goals driving the PALM Scheme place a real and substantial

burden on the Commonwealth to support the good treatment of migrant workers in-country. Failure on this front seriously risks undermining the scheme's strategic and development objectives.

Indeed, the PALM Scheme has undergone significant reforms targeted at addressing exploitation and preventing workers from ending up in vulnerable situations. Such improvements include provisions mandating government approval of employers, the Deed and Guidelines prescribing uniform standards on all employers, the participation of Labour Sending Units to assist with worker education before departure, and the involvement of unions during workers' time in-country. In 2023, the Commonwealth also introduced guaranteed minimum working hours and net pay for all PALM workers.<sup>15</sup> Those changes are designed to protect workers from a particularly insidious form of exploitation - reducing workers' pay artificially via excessive deductions or low hours, effectively forcing them into modern slavery. They have so far proven effective in curtailing these practices.

As the WHM program is intended to facilitate people-to-people exchange for holidaymakers, it does not provide the same incentives to government to ensure positive worker experiences. Indeed, despite repeated stories of backpacker exploitation, particularly in agriculture,<sup>16</sup> there have been very few regulatory changes to the WHM program since 2006.

**Finding 6:** The PALM Scheme represents an appropriate regulatory response to addressing and managing exploitation of migrant workers in agriculture. This is not reflected in the Working Holiday Maker program.

## A better way to resource agriculture

The history and current state of the PALM Scheme and WHM program lead the RSCA to an inexorable position. One scheme is suited to meeting the needs of agriculture employers facing labour shortages, and to ensuring fair and productive workplaces. Its underlying policy objectives drive it to deliver these outcomes. It has undergone rigorous reform to ensure it is fit for purpose. And it draws on a large pool of workers calling for additional opportunity. The other - a cultural exchange tool increasingly misused as a permanent labour source - does not and cannot support workers or indeed businesses that meet their obligations nearly as effectively.

It follows that supporting strong and sustainable regions means shifting the agriculture workforce away from the WHM program and further towards the PALM Scheme. To be clear, PALM is not perfect; see our recommendations to further improve its operation below. But it plainly represents the best means of advancing the interests of our regions and workers in this space.

A shift away from working holidaymakers and towards PALM workers would also deliver significant ancillary benefits - not least for holidaymakers themselves. Young people that come to Australia for a cultural exchange should travel the country experiencing rural towns, regional centres and our big cities. They should learn about First Nations peoples' 65,000+ years of continuous connection to country, hear the roar of the MCG, and enjoy a flat white as the sun rises over the surf at Snapper Rocks. They should not be forced into 88 days of misery, pain and exploitation at work. This review can make real change to how Australia engages young people who come here.

And while the WHM program is not driven by explicit strategic or diplomatic goals, we suggest that systemic exploitation in the program does risk damaging Australia's bilateral relationships. Most of the program's



largest sender countries are close partners in Europe and Asia.<sup>17</sup> The stories that working holidaymakers tell of our country back home should enhance our reputation in the world, not damage it.

By contrast, a well-regulated PALM Scheme unquestionably enhances Australia's efforts to play a positive role as part of a unified Pacific family. The scheme not only helps to meet the labour needs of Australian industry but assists in the development of regional partners through remittance and upskilling.

The RSCA anticipates industry pushback to the suggestion that the PALM Scheme's role in agriculture be increased at the expense of the WHM program. We note, for instance, the recent suggestion of the National Farmers' Federation that reforming the WHM program would "...[pull] *the rug out from underneath farm businesses without anything to replace it...*".<sup>18</sup> We urge the government to resist such pressure in light of substantial evidence of the PALM Scheme's capacity to drive better outcomes for Australia's regional workforce, farmers and neighbours alike.

## A new approach to agriculture worker migration

### Working Holiday Maker program - reform

The RSCA believes decisive reform to the WHM program and PALM Scheme in agriculture - specifically, the promotion of the latter and diminution of the former - is urgently needed and long overdue. In agriculture and especially horticulture, labour shortages can now be addressed effectively through the PALM Scheme. The impetus for reform also stems from a need to ensure that migrant workers are not exposed to a high risk of exploitation without appropriate regulatory safeguards.

**Recommendation 1:** The Commonwealth should reform the Working Holiday Maker program to ensure it is not used as a major and permanent labour source by the Australian agriculture industry.

The most direct means of achieving this change - and the RSCA's preferred solution - is to abolish specified work requirements pertaining to agriculture under the WHM visa. This would ensure that working holidaymakers are not directed into work that the WHM program is ill-suited to support them in. This shift would be supplemented by further expansion of the PALM Scheme, as well as reforms to further enhance its operation (see below).

While it would not represent a complete solution, abolition of 'plant and animal cultivation' from the WHM program's specified work requirements would at least support these outcomes in horticulture - the agriculture sector's largest receiver of both holidaymakers and PALM workers.

If the Commonwealth does not see fit to amend specified work requirements under the WHM program, it should enact reforms that would ensure the same level of regulation and oversight of working holidaymakers as apply to PALM workers. If holidaymakers are to continue to be a major and permanent presence in Australian agriculture, their vulnerability must be addressed and mitigated. A regulatory framework providing rights and protections equivalent to those prescribed in the PALM Scheme's Deed and Guidelines would be needed to ensure the welfare and fair and legal treatment of holidaymakers.

**Recommendation 2:** The Commonwealth should abolish specified work requirements pertaining to agriculture under the Working Holiday Maker program.

**Recommendation 3:** In the alternative to Recommendation 2, the Commonwealth should abolish 'plant and animal cultivation' from the Working Holiday Maker program's specified work requirements.

**Recommendation 4:** In the alternative to Recommendations 2 and 3, the Commonwealth should deliver a regulatory framework for Working Holiday Maker visa-holders working in agriculture, equivalent to the PALM Scheme's Deed and Guidelines.

In the immediate term, recent changes to the WHM program also provide the opportunity to conduct a live assessment of working holidaymakers' preferences absent specified work conditions and related requirements. The 2023 UK-Australia Free Trade Agreement removed such requirements for British holidaymakers in Australia.

The Commonwealth should undertake meticulous data collection regarding the work preferences of UK citizens in Australia under a working holiday visa. This would provide the government with useful insights as to the likely impact of wider reforms to the WHM program as relates to agriculture, such as those advocated by the RSCA.

**Recommendation 5:** The Commonwealth should track and analyse the work locations and industries of UK citizens in Australia under a Working Holiday Maker visa.

### Working Holiday Maker program - review

Regardless of whether the Commonwealth elects to shift the WHM program away from agriculture or deliver increased protections for holidaymakers in the sector, government should deliver increased oversight of the program. The Commonwealth should review the WHM program on a regular and recurrent basis to ensure working holidaymakers are not being exploited in agriculture (as well as other industries). Such reviews should occur on a 24-to-36-month basis.

Given unions' active role in monitoring for and addressing exploitation in agriculture, it is appropriate that these reviews are conducted on a tripartite basis. Engagement with regional community leaders can further assist in providing a worker and community-centred perspective.

Regular reviews could also support Jobs and Skills Australia in its efforts to ensure the WHM program is only used to address genuine labour shortages, rather than to drive down workers' pay and conditions.

**Recommendation 6:** The Commonwealth should conduct regular, recurrent and tripartite reviews of the Working Holiday Maker program.

### PALM Scheme - labour mobility

While the PALM Scheme is much better equipped to deliver positive workforce, business and foreign policy outcomes than the WHM program, this is not to suggest it cannot be optimised. Additional reform can further advance the interests of both agriculture workers and employers committed to the fair and legal treatment of staff.

At present, the PALM Scheme does not effectively support labour mobility for workers during their time in-country. In the RSCA's experience, PALM workers want to work. They want to earn as much money as they can while in-country to support their families and communities at home. They also seek out additional skills

and experiences that will help them thrive on their return. The AWU is often approached by PALM workers seeking help to identify an employer that will offer better hours, charge less for accommodation, or provide an upskilling opportunity. Without labour mobility, workers are typically prevented from realising these goals. Instead, current settings support businesses to undercut conditions by stifling workers' choice of employer.

The status quo also inhibits productivity by preventing PALM workers from relocating to sites most in need of additional labour. This is of particular significance in agriculture given peak harvest seasons vary between different crops and regions. Moreover, many farms' reliance on less productive working holidaymakers is greatest during these periods.

The RSCA acknowledges that recent reforms do allow PALM workers some leeway to change between approved employers while in Australia. These changes were delivered with the intent of helping workers exit exploitative employment situations. But the scheme still requires a worker to attain the approval of their current employer, as well as the Department of Employment and Workplace Relations, before changing. Without the certainty of future employment, workers are discouraged from taking action. Thus, these changes are insufficient.

Reforms to the PALM Scheme to allow workers to move easily between approved employers at their discretion alone is necessary.

**Recommendation 7:** The Commonwealth should reform the PALM Scheme to support workers to move between approved employers without the need for consent from either their current employer or the Commonwealth.

To further assist workers to move between approved employers, the Commonwealth should develop and maintain a database of available PALM workers in-country, and of approved employers requiring additional labour, as a public resource. As it stands, workers have no reliable means of identifying alternative employment. Individual employers also have no line of sight on where labour could be optimally redeployed.

In addition to addressing these issues, this resource would assist workers seeking additional work permitted by their visa but not offered by their employer. Many AWU members are provided a 9-month visa but only a 6-month employment contract. They typically seek an additional three months of work with a different employer before returning home, but have limited or no means of finding it. The PALM Scheme currently prioritises recruitment of new workers from sender countries over utilisation of available workers in Australia.

A database of available workers and work opportunities is essential to match labour supply and demand in a PALM Scheme that properly supports worker mobility.

**Recommendation 8:** The Government should develop and maintain a public database of available PALM workers in-country and approved employers requiring additional labour.

## **More information**

The RSCA is committed to assisting the Commonwealth to support a productive agriculture sector with robust employment standards. Both outcomes, in our view, are at the heart of a strong and sustainable regional Australia.

We would welcome the opportunity to further assist the review.

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<sup>2</sup> <https://www.theguardian.com/australia-news/2019/sep/26/88daysaslave-backpackers-share-stories-of-farm-work-exploitation>

<sup>3</sup> [https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/rp/rp1617/Quick\\_Guides/WorkingHoliday](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1617/Quick_Guides/WorkingHoliday)

<sup>4</sup> <https://apo.org.au/sites/default/files/resource-files/2020-11/apo-nid313489.pdf>, p.13

<sup>5</sup> [https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/rp/rp1617/Quick\\_Guides/WorkingHoliday](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1617/Quick_Guides/WorkingHoliday)

<sup>6</sup> <https://ipc2009.popconf.org/papers/92045>

<sup>7</sup> <https://ipc2009.popconf.org/papers/92045>, p.24

<sup>8</sup> <https://www.flinders.edu.au/content/dam/documents/research/aiti/the-australia-experience-perceptions-of-australias-whm-program.pdf>, p.71

<sup>9</sup> <https://www.abc.net.au/news/2020-09-30/coronavirus-farm-worker-shortage-coming-harvests/12714694>

<sup>10</sup> Budget Estimates 2023/24, Department of Employment and Workplace Relations question no. SQ23-001188: Available [here](#)

<sup>11</sup> Discussion paper, p. 13

<sup>12</sup> Discussion paper, p. 23

<sup>13</sup> [https://devpolicy.org/fiji-replaces-vanuatu-as-top-palm-sending-country-20240723/;](https://devpolicy.org/fiji-replaces-vanuatu-as-top-palm-sending-country-20240723/)

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<sup>14</sup> [https://thefarmermagazine.com.au/new-ag-visa-hoped-to-end-critical-worker-shortages/;](https://thefarmermagazine.com.au/new-ag-visa-hoped-to-end-critical-worker-shortages/)

<https://thefarmermagazine.com.au/new-ag-visa/>

<sup>15</sup> <https://www.palmscheme.gov.au/sites/default/files/2024-04/Minimum%20hours%20requirement%20and%20interaction%20with%20minimum%20net%20pay%20guarantee.pdf>

<sup>16</sup> <https://www.theguardian.com/australia-news/2019/sep/26/88daysaslave-backpackers-share-stories-of-farm-work-exploitation>

<sup>17</sup> <https://www.homeaffairs.gov.au/research-and-stats/files/working-holiday-report-dec-23.pdf>, p. 17

<sup>18</sup> <https://www.theaustralian.com.au/nation/politics/farmers-are-concerned-about-potential-changes-to-backpacker-rules/news-story/d2b675a86bd3f04b48140638fb4a6e89?amp>