

20 April 2026

The Hon Michelle Rowland MP

Attorney-General of Australia

PO Box 6022

House of Representatives

Parliament House

Canberra ACT 2600

By email: [attorney@ag.gov.au](mailto:attorney@ag.gov.au)

Dear Attorney-General,

### **Strengthening Australia's modern slavery laws**

We welcome the Government's commitment to strengthening Australia's *Modern Slavery Act 2018* (Cth) (**Act**), including the recent targeted consultations on due diligence requirements. As representatives of business, investors, unions, civil society, academics and survivor advocates, we recognise the importance of ensuring that the Act continues to evolve in a way that is both effective and practical.

With an estimated 50 million people in modern slavery globally, including nearly 28 million in conditions of forced labour, Australia must move beyond disclosure alone and strengthen the Act to drive meaningful action. The independent Anti-Slavery Commissioner's recent [position paper](#) underscores the urgency of reform.

Many Australian businesses are already taking meaningful action to identify and address modern slavery risks to support their reporting under the Act. These include investing in due diligence systems, engaging with suppliers and building internal capability. However, uptake remains uneven. Clarifying the due diligence requirements under the Act will help level the playing field, provide certainty and ensure the Act is effective and fit-for-purpose.

To ensure reform is meaningful and pragmatic, we urge the Government to prioritise:

1. **Alignment with key international standards**, such as the *UN Guiding Principles on Business and Human Rights* and the *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*.
2. **A requirement to undertake risk-based due diligence**, which would level the playing field and promote an effective, proportionate, and outcome focused approach to addressing modern slavery – reflecting what many Australian businesses are already doing.

The upcoming reform is a crucial opportunity to bring clarity to entities acting in good faith, hold noncompliant entities to account, lift conditions for people trapped in forced labour, and align Australia with global standards. This will support business productivity by reducing barriers to global markets and refocusing efforts on action rather than just reporting. It is a chance for Australia to continue showing leadership in building supply chains where the people who produce our food, clothing and technology live and work in freedom and dignity.

Yours sincerely,

Human  
Rights  
Law  
Centre.



Global Compact  
Network Australia

**act:onaid**



Union Aid Abroad **APHEDA**  
The global justice organisation of the Australian union movement



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People are NOT for sale



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CHILD RIGHTS  
TASKFORCE



Australian  
Nursing &  
Midwifery  
Federation

**Australian  
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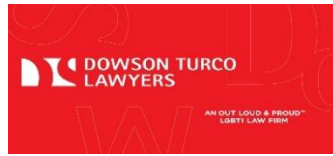
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BRIGHTLIGHT





CORPORATE ACCOUNTABILITY LAB



INVESTOR ALLIANCE FOR HUMAN RIGHTS AN INITIATIVE OF ICCR





Fundación Libera contra el Tráfico de Personas y la Esclavitud en Todas sus Formas



B&HR ACCESS TO JUSTICE LAB



MACQUARIE University SYDNEY AUSTRALIA



maurice blackburn lawyers



Migrant Justice INSTITUTE



MIGRANT WORKERS CENTRE



MILFORD



Mining & Energy Union



MoneyMatters LEADING ETHICAL INVESTMENT ADVICE



OECD Watch



OXFAM Australia



Praxis™ Perpetual GROUP

An Everence Company

PILLAR TWO

project respect

PRI



regenerative

Religions for Peace Australia

<https://religionsforpeaceaustralia>



Responsible Investment Association Australasia

SA UNIONS



**Signatories:**

Human Rights Law Centre

Walk Free

Above Ground (Canada)

ActionAid Australia

Advocate for Public Interest Law (South Korea)

Amfori

Anti-Slavery Australia

Anti-Slavery International

Aquinas Associates

Australian Catholic Religious Against Trafficking in Humans (ACRATH)

Australian Child Rights Taskforce

Australian Council of Trade Unions

Australian Ethical

Australian Lawyers for Human Rights

Australian Uyghur Womens' Tangritagh Association

Australian Workers Union

Australian Nursing & Midwifery Federation

Baptist World Aid

Be Slavery Free

Better Sydney

Brightlight Group

Business and Human Rights Access to Justice Lab

Business and Human Rights Centre

Canadian Network on Corporate Accountability (Canada)

CBIS, Inc

Cleaning Accountability Framework

Colonial First State

Corporate Accountability Lab (US)

Dowson Turco Lawyers  
DPAM nv  
ESG Advisory  
Ethical Clothing Australia  
Ethical Investment Advisors  
Ethos Foundation  
Fair Futures  
Fair Supply  
Figure 8 Investment Strategies  
Freedom United  
Future Group  
Human Trafficking Legal Centre (US)  
IFM Investors  
Informed365  
Interfaith Center for Corporate Responsibility (US)  
International Coalition to End Organ Trafficking in China  
International Justice Mission  
Investor Alliance for Human Rights  
KTNC Watch (Korea)  
Libera Foundation (Chile)  
Macquarie University (Dr Ebony Birchall, Dr Hayley Jago, Dr David Birchall)  
Maurice Blackburn Lawyers  
Migrant Justice Institute  
Migrant Workers Centre  
Milford  
Mining and Energy Union  
MMH Foundation  
MN  
Money Matters  
OECD Watch

Oxfam Australia

Perpetual Group

Pillar Two

Praxis Investment Management

Project Respect

Regenerative Ltd

Religions for Peace Australia

Responsible Investment Association Australasia

Responsible Sourcing Network

RMIT Business and Human Rights Centre

SA Unions

Serena Lillywhite AM

Shop, Distributive and Allied Employees Association National

Sibanye Stillwater

Siobhan Toohill (Director of Pure and Applied)

SIX

Survivor Connections

Tattarang Ltd (including Akubra, RM Williams, Wyloo, Squadron Energy, Harvest Road Group)

The Freedom Fund

Transparentem

Unchained Solutions

Union Aid Abroad APHEDA

UniSuper

Uniting Church in Australia (Synod of Victoria & Tasmania)

University of Adelaide (Dr Kyla Raby and Dr Katherine Christ)

University of Melbourne (Professor Vikram Bhakoo and Dr Kate McDonald)

University of Newcastle (Dr Tim Connor)

University of New South Wales (Emeritus Professor Stephen Frenkel)

University of Sydney (Associate Professor Martijn Boersma)

UN Principles for Responsible Investment<sup>1</sup>

UNSW Australian Human Rights Institute

Verité

Western Power

World Vision Australia

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<sup>1</sup> This statement was developed in collaboration between the coordinating organisations and their members, but does not necessarily represent the views of the entire memberships, either individually or collectively.