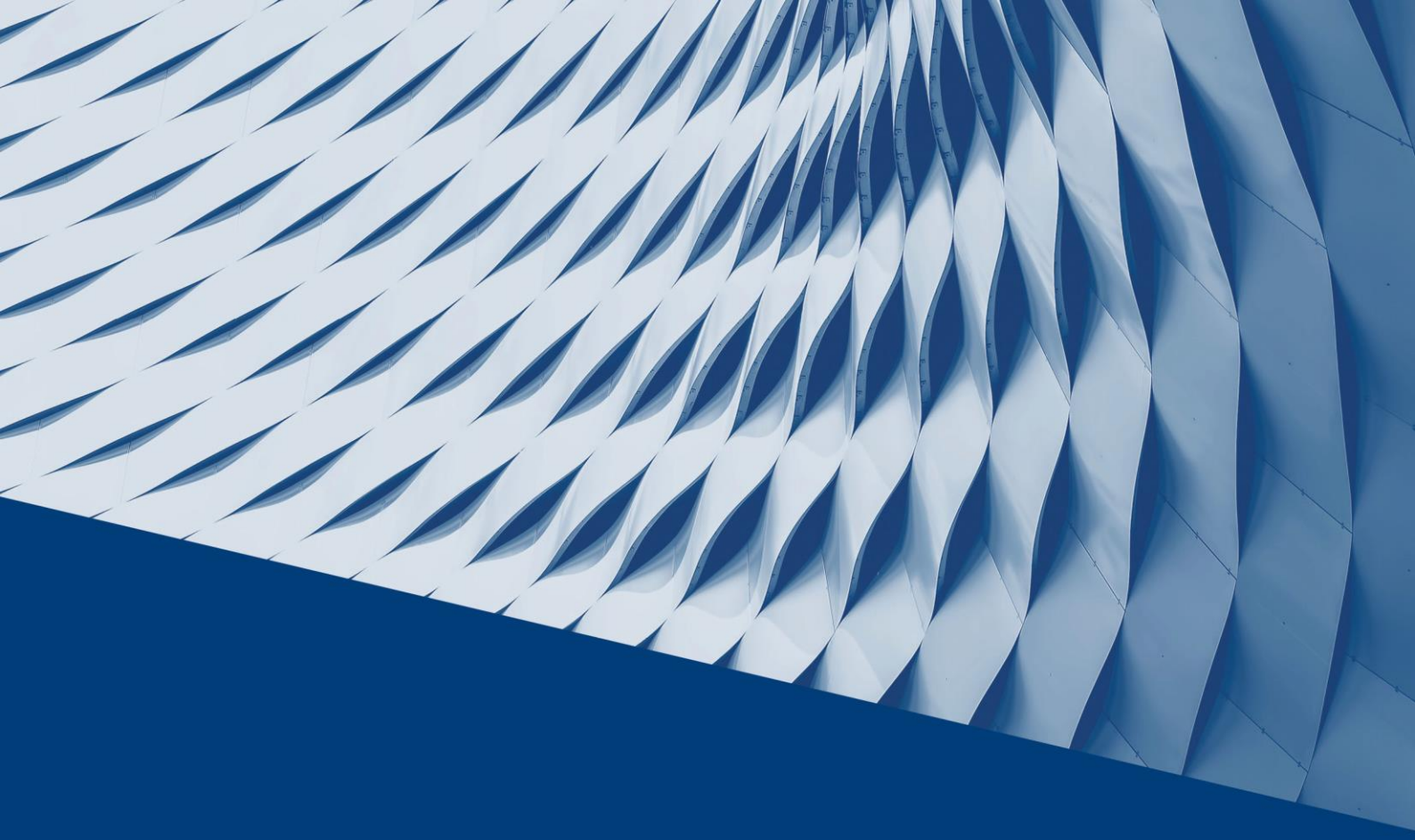

Migration Amendment (Strengthening Employer Compliance) Bill 2023

Submission by the Australian Council of Trade Unions to the Senate Legal and Constitutional Affairs Committee Inquiry

ACTU Submission, 21 July 2023
ACTU D. No 31/2023

ACTU
australian council of trade unions

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Introduction

About the ACTU

The Australian Council of Trade Unions (ACTU) is the peak trade union body in Australia, with 43 ACTU affiliated unions and state and regional trades and labour councils, who together have over 1.7 million members who are engaged across a broad spectrum of industries and occupations in the public and private sector.

The ACTU welcomes the opportunity to make a submission on the *Migration Amendment (Strengthening Employer Compliance) Bill 2023* (hereafter, 'the Bill'). This Bill would establish a criminal offence for employers and third-party providers who misuse visa programs to exploit temporary migrant workers. It would also implement recommendations 19 and 20 of the *Report of the Migrant Workers' Taskforce:*[1]

> ***Recommendation 19****: It is recommended that the Government consider developing legislation so that a person who knowingly unduly influences, pressures or coerces a temporary migrant worker to breach a condition of their visa is guilty of an offence.*
>
> ***Recommendation 20:*** *It is recommended that the Government explore mechanisms to exclude employers who have been convicted by a court of underpaying temporary migrant workers from employing new temporary visa holders for a specific period.*

Migration Amendment (Protecting Migrant Workers) Bill 2021

The ACTU participated in this Committee's inquiry into the *Migration Amendment (Protecting Migrant Workers) Bill 2021*, which was the previous Government's attempt to implement recommendations 19 and 20 of the *Migrant Workers' Taskforce.* That Bill had a number of serious flaws: first, it seriously underestimated the scale of migrant worker exploitation in Australia, and instead assumed the problem was a few 'bad apple' employers, rather than a systemic and widespread problem. In fact, there is a strong body of evidence[2] that shows migrant workers face exploitative practices such as wage theft that are endemic and are not being effectively addressed

[1] https://www.dewr.gov.au/migrant-workers-taskforce/resources/report-migrant-workers-taskforce

[2] See for example, L Berg and B Farbenbum, 'Wage Theft in Australia: Findings of the National Temporary Migrant Work Survey', UNSW Law, Sydney and University of Technology Sydney, 2017 https://www.sydney.edu.au/content/dam/corporate/documents/business-school/research/work-and-organisational-studies/towards-a-durable-future-report.pdf ; S Martin, '88 days a slave: backpackers share stories of farm work exploitation', The Guardian, 26/9/19, https://www.theguardian.com/australia-news/2019/sep/26/88daysaslave-backpackers-share-stories-of-farm-work-exploitation ; I Campbell, 'Harvest Labour Markets in Australia: Alleged Labour Shortages and Employer Demand for Temporary Migrant Workers', *Journal of Australian Political Economy*, No. 84, pp. 46-88; Unions NSW and Migrant Workers Centre, 'Working for $9 a day: wage theft and human rights abuses on Australian farms', 2021, https://www.unionsnsw.org.au/wp-content/uploads/2021/06/piece-rates-report.2-2.pdf

through the current regulatory approaches and mechanisms. This points to the need for a rethink of how to tackle this systemic exploitation of migrant workers – simply enhancing existing penalty, compliance and enforcement frameworks is not enough given the prevalence of exploitation. Urgent reforms are needed to deal with the root causes of migrant worker exploitation, driven primarily by temporary visa status and workers' reliance on an employer sponsor for the ability to stay in the country and access pathways to permanent residency. The *Protecting Migrant Workers Bill*, however, was not part of a broader reform agenda in this regard.

Second, the Bill relied on temporary migrant workers coming forward to report exploitation without providing them with any protections to do so, or addressing any of the factors that make them vulnerable to exploitation. This could expose temporary migrant workers to adverse immigration consequences, including the cancellation of their visa or not meeting the requirements for visa renewal.

Migration Amendment (Strengthening Employer Compliance) Bill 2023

The Albanese Government's approach to tackling migrant worker exploitation addresses these flaws with the previous Government's approach by taking a holistic view. This Bill is just one part of the Government's response to tackling migrant worker exploitation, which includes whistleblower protections for temporary migrant workers to report exploitation; exploring a new short term visa to allow temporary migrant workers to extend their stay in Australia, if required, to make a claim or support an investigation; reforms to the Pacific Australia Labour Mobility (PALM) program, including a minimum of 30 hours per week for short term workers; increasing the Temporary Skilled Migration Income Threshold (TSMIT); providing a guaranteed pathway to permanency for temporary skilled visa holders by the end of 2023; and the Migration System Review which is exploring reforms to 'design out exploitation from the migration system.'[3]

This Bill falls short in one key area, however. It fails to provide temporary migrant workers with a protection against visa cancellation. Visa cancellation can have a dire effect on temporary migrant workers, and the threat of visa cancellation – even if there is no substantive basis for cancellation – has a chilling effect on workers' ability to report exploitation, leading to them accepting exploitative and unsafe conditions of work rather than enforce their rights. While this bill recognises the impact of the threat of visa cancellation and creates offences to deter employers from making

[3] https://immi.homeaffairs.gov.au/programs-subsite/files/migration-strategy-outline.pdf

the threat, it contains no guarantee against visa cancellation to provide temporary migrant workers with the confidence to report exploitation and enforce their rights at work.

Exploited workers should not have their visa cancelled as a consequence of raising a workplace complaint under any circumstances. Unions, civil society organisations and academics have been calling for a guarantee against visa cancellation to provide migrant workers with the confidence required to enforce their rights at work. The model proposed – an Exploited Worker Visa Guarantee[4] - involves the Minister issuing regulations for the purpose of s116(2) of the Act, which provides that a visa must not be cancelled under particular circumstances. That instrument should specify that the circumstances include where there is prescribed evidence – provided in the form of certification by a government regulator, a court or tribunal, or an expert employment lawyer – that the visa holder had been subject to a non-trivial breach of labour law.

The ACTU recommends Parliament pass this bill with amendments to Part 6, Div 1, Item 37 in order to implement an effective protection against visa cancellation, such as the model that has been proposed.

Recommendations

Recommendation 1: The Amendments at Part 6, Div 1, Item 37 must be rejected and replaced with an effective guarantee against visa cancellation for exploited workers, such as the Exploited Worker Visa Guarantee.

Recommendation 2: The decision to declare an employer prohibited should rest with the Fair Work Commission, on the basis of all available evidence, including evidence previously produced to the FWO or obtained by an officer or an employee of a registered organisation.

Recommendation 3: The ACTU must be notified of the proposal to prohibit an employer and the relevant union/s invited to make a written submission, setting out the reasons why a declaration should or should not be made.

[4] See Grattan Institute (2023), 'Short-changed: How to stop the exploitation of migrant workers in Australia', https://grattan.edu.au/wp-content/uploads/2023/05/Short-changed-How-to-stop-the-exploitation-of-migrant-workers-in-Australia.pdf p. 40; and Migrant Justice Institute (2023), 'Breaking the Silence: A proposal for whistleblower protections to enable migrant workers to address exploitation', https://www.migrantjustice.org/highlights/highlights/2023/2/27/breaking-the-silence-whistleblower-protections-to-enable-migrant-workers-to-address-exploitation

Recommendation 4: Grounds for prohibition should include where an employer has breached the Pacific Australia Labour Mobility (PALM) Approved Employer Deed and Guidelines, health and safety laws, and other work-related laws and regulations.

Recommendation 5: Unions should have the ability to make an application for an employer to be declared prohibited.

Recommendation 6: In addition to the broad range of reforms the Government is already undertaking and our call to introduce protections against visa cancellation for temporary migrant workers reporting workplace exploitation, the following reforms are required to prevent and address migrant worker exploitation:

- Abolish visa conditions that tie workers to a single employer, to enable workers mobility between employers.
- All visas should provide a clear, accessible, affordable, and self-nominated option to obtain permanent residency and access to Australia's social safety net including Medicare and Centrelink. The Australian Government should explore opportunities to offer permanency to more temporary migrants.
- Ensure all migrant workers receive an on-arrival induction from a representative of the relevant unions and/or peak union body to provide them with information about their workplace rights and give them the opportunity to join the union.
- Introduce whistleblower protections for migrant workers reporting exploitation and a short-term 'workplace justice visa' established to enable workers to leave an exploitative employer and to pursue action against them.
- Immediately abolish the 88-day specified work requirement for Working Holiday visas by abolishing second- and third-year Working Holiday visas.
- Ensure migrant workers have the same workplace rights as local workers, including access to the Fair Entitlements Guarantee scheme.
- Consideration be given to requiring employers to pay the wages of temporary migrant workers into Australian bank accounts, and therefore within the oversight and jurisdiction of Australian authorities.

Part 1, Item 2 - New Criminal Offences

We support this section of the bill, which establishes new criminal offences and related civil penalty provisions that apply when a person coerces, or exerts undue influence or undue pressure on, a temporary migrant worker to accept or agree to a work arrangement, in order to target exploitative conduct by employers. These offences are broader than the Bill proposed by the previous

Government, and capture employer conduct that results in the worker believing that if they do not accept or agree to the arrangement, there will be an adverse effect on the worker's continued presence in Australia[5], there will be an adverse effect on the worker's visa status (such as visa cancellation), or the worker will be unable to provide information or documents about the work they have done in Australia they are required to provide in connection with a visa or an application for a visa (eg. they would not be able to meet the requirements to support a visa application).[6]

It is important to note that new criminal sanctions and increased penalties alone are unlikely to act as a strong deterrent to prevent employers from exploiting temporary migrant workers. In 2018, a series of enhanced sanctions were introduced to the Act relating to employer-sponsors[7] – including civil and criminal penalties for failing to satisfy sponsorship obligations.[8] Yet the number of proceedings commenced against employer-sponsors under those provisions are negligible, precisely because the key witnesses in such proceedings, the sponsored workers, would risk visa cancellation and their pathway to permanent sponsorship if they were to report breaches by their employer. Therefore, it is critical that protection against visa cancellation for temporary migrant workers form part of the Government's response to preventing and addressing migrant worker exploitation.

Part 2, Div 1, Item 5 – Migrant Worker Sanctions and Prohibited Employers

We support the measures in the bill which establish a new framework to prohibit certain employers from employing additional temporary migrant workers with offence and civil liability provisions for non-compliance.

Migrant Worker Sanctions, including sanctions, offences or civil penalties in the Migration Act, the Criminal Code and the Fair Work Act, enable the Minister to make a prohibition declaration. These provisions seek to protect migrant workers from exploitation by preventing employers who have already been found to contravene various work-related provisions from engaging migrant workers for 5 years (if an employer is subject to a migrant worker sanction under more than one provision or subject to a migrant worker sanction multiple times, a separate 5 year period applies in each

[5] 245AAB (1) d
[6] 245AAC (1) d
[7] *Migration and Other Legislation Amendment (Enhanced Integrity) Bill* 2017.
[8] *Migration Act 1958* (Cth), ss 140K, 140Q.

instance). The bill also provides that a list of prohibited employers must be published on the Department of Home Affairs website, and that former prohibited employers must give the Department information on the temporary migrant workers they employ in the future.

In making a decision about whether to declare a person to be a prohibited employer, the Minister must consider a written submission made by the person and any criteria prescribed by the regulations. Given the public interest issues at play, however, it is not appropriate that the only person entitled to be heard in deciding those matters is the employer who faces prohibition. We recommend a broader, transparent and more accountable process with standing given to workers, regulators and registered organisations. If an employer has systematically breached minimum employment standards, it is likely that unions will be aware of more breaches that may not be known to the Home Affairs Minister when making a decision, so it is crucial unions are given the opportunity to provide this evidence. As such, we propose that the Fair Work Commission is the appropriate tribunal to declare a person to be a prohibited employer, rather than the Minister. Ideally, the Fair Work Commission would be empowered to make these decisions on application or on its own initiative, and existing provisions of the Fair Work Act (see for example Subdivision B Division 3 or Part 5-1) would facilitate procedural fairness and making of inquiries of persons and agencies who might have relevant information to provide. Additionally, specific standing to apply should be afforded to a State or Federal Minister or agency head, the Fair Work Ombudsman or registered organisation. Current procedures of the Commission would allow public notice being given of the application or own-initiative commencement of a matter, to ensure interested persons could contribute.

Provision is also made for a review of the Minister's decision to declare a person a prohibited employer[9] by the Administrative Appeals Tribunal (AAT), however only the decision to declare a person as a prohibited employer is reviewable by the AAT – not a decision to decline to do so. This is a function of the decision-making power being vested in the Minister at the first instance as an exercise of executive or administrative power affecting only the subject of that power, rather than being more sensibly conceived of as a regulatory compliance action being taken in the public interest and impacting or engaging the interests of a class of persons beyond just the subject of the power. Whilst it would be possible to provide the AAT with a power to examine decisions of the Minister to not declare an employer prohibited, a better solution would be to vest the decision in

[9] 245AYK(9)

the first instance in the Fair Work Commission, complete with a right to Appeal to a Full Bench thereof.

We propose that before a person is declared to be a prohibited employer[10], that the Australian Council of Trade Unions, as the peak union body in Australia, is notified in writing of the proposal to make such a declaration and the reasons for it, and the relevant union/s invited to make a submission setting out reasons why the declaration should or should not be made.

We propose that the criteria specify the decision maker must also have regard to other relevant information, including whether the employer has breached the Pacific Australia Labour Mobility (PALM) Approved Employer Deed and Guidelines, if applicable. While the Department of Employment and Workplace Relations and the Department of Foreign Affairs and Trade have the ability to set conditions on the geographic regions or numbers of workers that can be hired by designated Approved Employers under the PALM program where the employer has failed to meet the standards required by the PALM Deed and Guidelines, systematic or serious breaches of these rules should trigger consideration of a more comprehensive ban on engaging migrant workers.

Further, there are a range of breaches not covered by the Migrant Worker Sanctions contemplated in this bill, including systematic breaches of employment law that are not investigated by the FWO, and breaches in relation to work health and safety investigated by state regulators, that should enable an employer to be declared prohibited from engaging additional migrant workers. We propose the new provisions of the Fair Work Act at 537D, 537K and 527S be added to the list of 'relevant fair work provisions' at 245AYB. These sections relate to the new sexual harassment prohibitions; these amendments are necessary to ensure those breaches can form the basis of an exclusion by adding to the grounds permitted under proposed section 245AYH.

Given the barriers migrant workers face to raising issues of exploitation with the authorities (described in the next section), in many cases unions will have collected evidence from workers of breaches that have not been formally investigated by the FWO, for instance. It is therefore important that workers and their representatives have the ability to make an application for a prohibition declaration for an employer or former employer.

[10] A45AYK

Recommendation 2: The decision to declare an employer prohibited should rest with the Fair Work Commission, on the basis of all available evidence, including evidence previously produced to the FWO or obtained by an officer or an employee of a registered organisation.

Recommendation 3: The ACTU must be notified of the proposal to prohibit an employer and the relevant union/s invited to make a written submission, setting out the reasons why a declaration should or should not be made.

Recommendation 4: Grounds for prohibition should include where an employer has breached the Pacific Australia Labour Mobility (PALM) Approved Employer Deed and Guidelines, health and safety laws, and other work-related laws and regulations.

Recommendation 5: Unions should have the ability to make an application for an employer to be declared prohibited.

Part 6, Div 1, Item 37 subsection 116(1A) Cancellation powers

The amendments in Division 1 (Item 37) amend section 116 (*Power to cancel)* of the *Migration Act* by repealing current subsection 116(1A) and substituting it with new subsections 116(1A) and (1B). This will allow the Governor-General to prescribe matters to which the Minister must, may or must not, have regard in determining whether the Minister is satisfied of certain matters relevant to the cancellation of visas, and to specify the weight given to any such matters. This is a far cry from an effective protection against visa cancellation, however.

Fear of visa cancellation is one of the key barriers to temporary migrant workers raising issues of exploitation. A large survey of temporary migrants conducted in 2018 found that a quarter of respondents had not or would not try to recover unpaid wages due to fear of possible immigration consequences.[11]

Currently, if a worker brings an issue with their employer to the Fair Work Ombudsman that reveals migration law breaches, the Department of Home Affairs may be informed, leaving the worker vulnerable to deportation for breach of their visa conditions. Under s116(1)(b) of the *Migration Act,*

[11] Bassina Farbenblum and Laurie Berg, 'Wage theft in silence: why migrant workers do not recover their unpaid wages in Australia', October 2018, https://static1.squarespace.com/static/593f6d9fe4fcb5c458624206/t/62621a72d737a96241d7cdae/1650596473879/Wage%2Btheft%2Bin%2BSilence%2BReport.pdf ,p. 8.

the Minister may cancel a visa where they are satisfied that its holder has not complied with the conditions of the visa – meaning that if a visa holder was to report exploitation where they were forced to work in breach of their visa conditions (such as an international student being coerced into working more than 48 hours a fortnight), they could risk their visa being cancelled.

The impact of visa cancellation on a migrant worker is incredibly dire: the visa holder is rendered an unlawful non-citizen, and they are only eligible to apply for a Bridging E visa which does not allow them to work or study, while they make arrangements to leave the country. If the person experiences financial hardship, they may be compelled to work without authorisation, making them even more vulnerable to exploitation. Workers in exploitative working situations must weigh up this potential grave outcome with the benefits of reporting exploitation and having the issue addressed.

The Assurance Protocol

Currently, the 'Assurance Protocol' between the Fair Work Ombudsman (FWO) and the Department of Home Affairs states that the Department of Home Affairs will not cancel a person's visa if they have breached their work-related visa conditions because of workplace exploitation, provided the person has sought advice or support from FWO, there is no other reason to cancel the visa, and the person has committed to following visa conditions in the future.[12]

Unions have criticised the Assurance Protocol for being weak, as it is not a legislated protection against visa cancellation, but rather subject to discretion, and poorly communicated to workers. The process for accessing the Assurance Protocol is opaque and there is no clear appeal process. It is also only available to workers assisting the FWO with inquiries – so it is not available to exploited workers where the FWO is not making further inquiries due to what they perceive as inadequate evidence or lack of agency resources, and it is also not available for issues outside of the FWOs remit, for instance work health and safety issues or discrimination.

The Explanatory Memorandum[13] of the bill notes that the provisions at Part 6, Div 1, Item 37 will allow measures such as the Assurance Protocol to codified in the regulations to give additional assurance to migrant workers that they can seek help without fear of visa cancellation, even if they

[12] Department of Home Affairs, 'Workers rights and visa protections', https://immi.homeaffairs.gov.au/visas/working-in-australia/work-rights-and-exploitation

[13] https://parlinfo.aph.gov.au/parlInfo/download/legislation/ems/r7058_ems_1204d6a7-026c-4380-b2ca-aef91d596ff7/upload_pdf/JC010054.pdf;fileType=application%2Fpdf#search=%22legislation/ems/r7058_ems_1204d6a7-026c-4380-b2ca-aef91d596ff7%22 para. 442, p. 74.

have breached work-related visa conditions. The Explanatory Memorandum provides that the terms and conditions of the Assurance Protocol are subject to consultation before they are prescribed under new subsection 116 (1A) to ensure they are holistic and robust, while maintaining visa program integrity.[14] Without regulations or a description of the proposed 'codification' in the Explanatory Memorandum, it is difficult to know what the Government intends. However, if it is intended to reflect the terms of the current Assurance Protocol in the regulations or provide that delegates will 'have regard to' the visa holder's participation in FWO investigations, then that is clearly inadequate to protect workers.

These amendments must be rejected

The proposed amendments will continue to allow discretionary cancellation of exploited workers' visas by providing for Regulations that specify matters that a delegate 'must' or 'must not' take into account and the weight to be afforded to those matters, without specifying that the discretion must be exercised one way or another. The proposed amendments also mirror the problems of the Assurance Protocol in that the provisions contemplate regulations that will allow for the 'quarantining' of information between government regulators and the Department. This is based on the assumption that the only source of adverse information can come from a regulator, which will not protect visa holders from retaliatory reports being made against them directly by employers to the Department. Because the powers are poorly framed and rely on further discretionary considerations to be set out in Regulations, they cannot be clearly communicated to visa holders, meaning that they cannot be provided with the confidence they require in order to take action to enforce their rights.

A real guarantee against visa cancellation: an Exploited Worker Visa Guarantee

Given the dire situation temporary migrant workers would face if their visa was cancelled, and the chilling effect this has on migrant workers coming forward and reporting exploitation, empowering migrant workers requires a clear, rock-solid commitment against visa cancellation.

Australian Unions support a model for protection against visa cancellation that involves the Minister issuing an instrument for the purpose of s116(2) of the Act, which provides that a visa must not be cancelled under particular circumstances. That instrument should specify that the circumstances include where there is prescribed evidence – provided in the form of certification

[14] *Ibid.*

by a government regulator, a court or tribunal, or expert employment lawyer – that the visa holder had been subject to a non-trivial breach of labour law. This would reassure temporary migrant workers that their visa will not be cancelled if they report workplace exploitation, even if they have breached their visa conditions. The cancellation protection would not extend to other cancellation powers, for instance the general cancellation power at s109 (available in relation to incorrect information) or s501 (relating to character).

This model is supported by unions, academics, migrant rights organisations, faith based groups, and was recently endorsed by the Grattan Institute in their report *Short Changed*[15], which described the cancellation as an 'Exploited Worker Visa Guarantee' which should have the following features:

- **Eligibility**: available to migrant workers whose visa would be cancelled after breaching visa conditions due to exploitation.
- **Type of exploitation or mistreatment covered**: a non-trivial breach of labour law. A Ministerial Direction should specify the list of workplace contraventions that give rise to protection against cancellation. It should be restricted to cases where the underpayment exceeds $2,000.
- **Action required by the worker:** evidence of a meritorious claim that a contravention has occurred and that the worker is taking action to address it.
- **Demonstrated by**: certification by a government enforcement agency (for example, the Fair Work Ombudsman) that is conducting inquiries in relation to the visa-holder's employment; a court, tribunal, or commission certifying that a worker's ongoing presence in Australia is required for the conduct of its proceedings; certification by an employment law practitioner. In addition, the worker must have reported the contravention to a relevant government authority.
- **Legal instrument**: regulations issued pursuant to s116(2) of the Migration Act, prescribing that a visa is not to be cancelled in circumstances where a worker has a claim that a contravention has occurred and is taking action to address it (i.e. is a whistleblower).

This proposal has the following, critical benefits:

[15] Para 2.7 https://grattan.edu.au/wp-content/uploads/2023/05/Short-changed-How-to-stop-the-exploitation-of-migrant-workers-in-Australia.pdf

- *First,* it offers a robust protection against visa cancellation which may be easily communicated to visa holders, to provide the certainty they require to take action for breaches of workplace law;
- *Secondly,* it places the parties with greatest knowledge of workplace law – regulators, Courts, Tribunals and employment lawyers, including in trade unions – at the heart of establishing breaches and encouraging action by visa-holders;
- *Thirdly,* the model does not rely on Departmental delegates to make complex, evaluative judgments about breaches of labour law, which they are fundamentally unequipped to do. The involvement of immigration authorities in assessing and establishing workplace breaches has been identified as a key weakness of similar visa protection schemes in Canada – Departmental officials are unversed in labour law and, if in doubt, err on the side of bringing about adverse outcomes for visa holders or applicants.

Part 6, Div 1, Item 39 Section 235 – offences in relation to work

Item 39 repeals current section 235 (offences in relation to work) of the Migration Act, which provides that a temporary migrant commits an offence if they contravene a work-related visa condition. Unions support the repeal of this section to encourage temporary migrant workers to report exploitation.

Further reforms are needed to strengthen employer compliance and prevent migrant worker exploitation

Recommendation 6: In addition to the broad range of reforms the Government is already undertaking and our call to introduce protections against visa cancellation for temporary migrant workers reporting workplace exploitation, the following reforms are required to prevent and address migrant worker exploitation:

- Abolish visa conditions that tie workers to a single employer, to enable workers mobility between employers.
- All visas should provide a clear, accessible, affordable, and self-nominated option to obtain permanent residency and access to Australia's social safety net including Medicare and Centrelink. The Australian Government should explore opportunities to offer permanency to more temporary migrants.
- Ensure all migrant workers receive an on-arrival induction from a representative of the relevant unions and/or peak union body to provide them with information about their workplace rights and give them the opportunity to join the union.

- Introduce whistleblower protections for migrant workers reporting exploitation and a short-term 'workplace justice visa' established to enable workers to leave an exploitative employer and to pursue action against them.
- Immediately abolish the 88-day specified work requirement for Working Holiday visas by abolishing second- and third-year Working Holiday visas.
- Ensure migrant workers have the same workplace rights as local workers, including access to the Fair Entitlements Guarantee scheme.
- Consideration be given to requiring employers to pay the wages of temporary migrant workers into Australian bank accounts, and therefore within the oversight and jurisdiction of Australian authorities.

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