



Specific comments concerning COAG's seven new Working Groups

- (a) Business regulation and competition
- (b) Climate change and water
- (c) Health
- (d) Housing
- (e) Indigenous reform
- (f) Infrastructure
- (g) Productivity agenda

(a) *Business Regulation and Competition Working Group*

Catholic Social Services Australia welcomes the establishment of the Business Regulation and Competition Working Group. On issues relevant to this Working Group, we draw your attention to Recommendations 1, 5-7, 25, 26 and especially to Recommendations 9-11 and 16-17 of our *Pre-Budget Submission* (see [Annex B](#) to this Open Letter for brief references to these recommendations, and [Annex F](#) for full versions).

We were disappointed by the omission of any reference to **social inclusion** in the 20 December 2007 documentation on this Working Group. The promotion of social inclusion should be an explicit objective of this Working Group, as of all others. In particular, the Working Group should ensure that low-income households do not pick up the tab for government revenue foregone as a result of regulatory reform – especially in such areas as water trading and the energy market.¹

Unless alternative provision is made for this purpose, the regulatory environment affecting not-for-profit providers of social services should be included in the **scope** of this Working Group.²

(b) *Working Group on Climate Change and Water*

The expressed commitment of Commonwealth and State Governments to tackling the vital issues of climate change and water is to be highly commended. On issues relevant to this Working Group, we draw your attention to Recommendations 1, 5-7, 25, 26 and especially to Recommendation 44 of our *Pre-Budget Submission* (see [Annex B](#) to this Open Letter for brief references to these recommendations, and [Annex F](#) for full versions).

There is no reference to **social inclusion** or fairness in the 20 December 2007 documentation on this Working Group. Yet social inclusion factors are especially important in the context of climate change. Low-income households must not be burdened with a disproportionate share of the costs of climate change and action to address it. This will require specific measures to protect low-income earners from direct and indirect cost increases associated with climate change measures (such as an emissions trading scheme). It will also need energy efficiency assistance programs so low-income people can participate without undue disadvantage in a

¹ Catholic Social Services Australia, *2008-09 Pre-Budget Submission to Commonwealth Government* ([Annex F](#) to 20 March 2008 Open Letter to COAG participants) at p.13, para 72; see also at p.12, Recommendation 25.

² *Ibid* at p.5, Recommendation 11 and at p.6, paragraph 31.

more energy-efficient future.³ For these reasons, general and specific social inclusion objectives and work program measures should be included – and appropriately prioritised – in this Working Group’s agenda and activities.

(c) Working Group on Health and Ageing

The establishment of both this Working Group and the National Health and Hospitals Reform Commission (NHHRC) are extremely positive developments. On issues relevant to the Working Group, we draw your attention to Recommendations 1, 5-7, 25, 26 and especially to Recommendations 4, 8, 16-17, 35 and 37 of our *Pre-Budget Submission* (see Annex B to this Open Letter for brief references to these recommendations, and Annex F for full versions).

Catholic Social Services Australia particularly welcomes the inclusion of “investment in public **dental programs**” in areas to be addressed in implementation plans to be delivered to next week’s COAG meeting, and looks forward to progress in this important field. But we would welcome greater attention to **mental health** in the *Working Group’s* activities, as well as information on how the Working Group views its role in relation to the National Action Plan on Mental Health 2006-2011 agreed by COAG on 14 July 2006. We’d also recommend that mental health be explicitly included among areas to be addressed in the long-term health reform plan which the *NHHRC* is to produce by June 2009.

“The promotion of **social inclusion**” should be listed as an objective of the *Working Group*, with more specific objectives and work program measures developed as appropriate. And we note with regret that the *NHHRC* Terms of Reference agreed at the 20 December 2007 COAG meeting make no reference to social inclusion, and recommend reconsideration of this position.

(d) Housing Working Group

We are delighted by the priority being placed by COAG on housing and homelessness. We particularly welcome the attention this new Working Group will devote to housing affordability for low income households; homelessness; Indigenous people’s housing issues; social inclusion objectives; and social and community housing.

On issues relevant to the Working Group, we draw your attention to Recommendations 1, 5-7, 25, 26 and especially to Recommendations 4, 8, 16-17, 40 and 42 of our *Pre-Budget Submission* (see Annex B to this Open Letter for brief references to these recommendations, and Annex F for full versions).

(e) Working Group on Indigenous Reform

Following last month’s historic apology by the Commonwealth Parliament to Indigenous Australians, we look forward to the role this new Working Group might play in “closing the gap” on Indigenous disadvantage.⁴ Especially welcome is the commitment to ensure that Indigenous disadvantage receives appropriate attention in plans for implementing “other Commonwealth election commitments in health, education and housing”.

On issues relevant to the Working Group, we draw your attention to Recommendations 1, 5-7, 25, 26 and especially to Recommendations 4, 8, 16-17, 34 and 60-61 of our *Pre-Budget*

³ For further detail, see *ibid* at Recommendation 44 and pp.21-22. See also Brotherhood of St Laurence, Catholic Social Services Australia and National Welfare Rights Network, Joint Submission to the Prime Ministerial Task Group on Emissions Trading, April 2007 (available at http://www.pmc.gov.au/climate_change/emissionstrading/submissions.cfm).

⁴ Catholic Social Services Australia and its member organisations look forward to participating in a new and concerted national effort to ‘close the gap’ between Indigenous and other Australians (see e.g. Catholic Social Services Australia, *National Apology Heralds New Era of Healing and Action to ‘Close the Gap’*, Media Release No. 02/2008, 13 February 2008, available at www.catholicsocialservices.org.au).

Submission (see [Annex B](#) to this Open Letter for brief references to these recommendations, and [Annex F](#) for full versions). Also relevant is our *Submission* to last year's Senate Committee inquiry into the "Northern Territory intervention" legislation, especially in relation to welfare quarantining and sentencing (included as Attachment C to [Annex F](#) of this Open Letter).

(f) Infrastructure Working Group

There is clearly an important role for this new Working Group and the new statutory advisory body, Infrastructure Australia: to improve future infrastructure provision in a way which promotes Australia's social inclusion agenda. We welcome the establishment of both entities. On issues relevant to the Working Group, we draw your attention to Recommendations 1, 5-7, 25 and 26 of our *Pre-Budget Submission* (see [Annex B](#) to this Open Letter for brief references to these recommendations, and [Annex F](#) for full versions).

We note with concern the absence of any reference to **social inclusion** in the 20 December 2007 documentation on the Infrastructure Working Group. As we have argued previously: "Access to and affordability of transport, energy, communications and water should be essential criteria of any work in this area (such as the proposed National Infrastructure Audit)."⁵ The *Dropping off the Edge* report⁶ has previously demonstrated the impact physical infrastructure can have on social inclusion objectives. We therefore recommend including "the promotion of social inclusion" as an explicit objective of this Working Group, with more specific social inclusion objectives developed as appropriate and with steps towards this goal factored into the Working Group's indicative forward work program.

In this context, we also urge reconsideration of the **membership of Infrastructure Australia**. This body will audit the adequacy and condition of nationally significant infrastructure – including transport, water communications and energy – and develop an Infrastructure Priority List to guide public and private infrastructure investment. It will also advise on regulatory reforms. The body's twelve members will be drawn from industry, government and local government (including five from the private sector, one of whom will serve as Chair).⁷ There should also be at least one dedicated place for the community sector. Our sector does not purport to offer expertise in technical aspects of the design and delivery of major infrastructure. But it does have unique expertise regarding the needs, circumstances and constraints of low-income earners – which must be taken into account in planning both infrastructure and the terms upon which it is provided (e.g. the nature and extent of community service obligations).

(g) Working Group on the Productivity Agenda: Education, Skills, Training and Early Childhood Development

Catholic Social Services Australia is delighted by the priority placed by this Working Group on early childhood development and education, especially in view of the link between these issue and disadvantage which has been illustrated by the *Dropping Off the Edge*⁸ report and other studies.

On issues relevant to this Working Group, we draw your attention to Recommendations 1, 5-7, 25, 26 and especially to Recommendations 4, 8, 16-17, 37, 45 and 46 of our *Pre-Budget Submission* (see [Annex B](#) to this Open Letter for brief references to these recommendations, and Annex F for full versions). Also relevant are points raised at pp.3-4 of our 19 December 2007 Open Letter to COAG Participants (attached as [Annex A](#) to this March 2008 Open Letter).

⁵ Catholic Social Services Australia, *2008-09 Pre-Budget Submission to Commonwealth Government* ([Annex F](#) to 20 March 2008 Open Letter to COAG participants) at p.13, para 72.

⁶ Tony Vinson, *Dropping off the edge: The distribution of disadvantage in Australia*, Jesuit Social Services and Catholic Social Services Australia, 2007.

⁷ Prime Minister Kevin Rudd and Infrastructure Minister Anthony Albanese, *Rudd Government to Dramatically Overhaul National Infrastructure Policy*, Joint Media Release, 21 January 2008.

⁸ See note 6 above.