

Background

In March 2024 the Federal Government announced that it will invest \$1 billion in the Sunshot Solar Program to be delivered by the Australian Renewable Energy Agency (ARENA). The SunShot Solar Program aims to “accelerate the development of Australia’s solar manufacturing industry, catalyse clean energy industries, drive innovation, and help Australia connect to new global solar supply chains, to take advantage of the immense jobs and investment potential of solar photovoltaics (PV).”

ARENA released a draft proposal and asked the public for feedback on several areas, including prioritising supply chains, program objectives, eligibility criteria, and complementary support mechanisms ([see consultation paper here](#)). The consultation paper did not explicitly address human rights risks related to solar supply chains. However, given the challenges posed by forced labour risk in global solar supply chains, we have responded to their questions from the perspective of addressing forced labour risks as part of their program design.

Our shared values require that we put every effort into ensuring that Australia’s solar industry is not built on the exploitation of others. This submission considers how, through thoughtful design, the SunShot program can contribute to building Australia’s economy while also addressing a major human rights risk that currently afflicts solar panel supply chains globally. That is, the risk of forced labour, human trafficking and slavery (collectively ‘modern slavery’) in solar supply chains.

Our submission, prepared by Shannon Hobbs and myself, can be found below.

Fiona David
Chief Executive Officer and Founder
Fair Futures Pty Ltd

Submission

Question 1.1

The Solar to Silicon Report has informed the Solar Sunshot Program ([see report here](#)). This report examines manufacturing opportunities across the solar PV supply chain, which is defined in the report as polysilicon, wafers, cells and module manufacturing. The initial Sunshot funding round will focus on developing a module manufacturing industry, and ARENA sought input on which parts of the supply chain should be prioritised.

Question 1.1: Which element(s) of the supply chain should be prioritised for support and why?

This submission considers how, through thoughtful design, the SunShot program can contribute to building Australia's economy while also addressing a major human rights risk that currently afflicts solar panel supply chains globally. That is, the risk of forced labour, human trafficking and slavery (collectively 'modern slavery') in solar supply chains.

An estimated 50 million people are trapped in modern slavery around the world, including 27.6 million in forced labour.¹ Forced labour happens from the point of extracting raw materials to manufacturing and shipping goods, and impacts global supply chains. Solar panels are no exception. In 2024, the NSW Anti-Slavery Commissioner identified solar panels as a product with a high risk of modern slavery that requires government agencies and businesses to undertake enhanced due diligence measures during procurement.² These heightened risks are founded upon state-sponsored forced labour programs that target Uyghur communities in the Xinjiang Uyghur Autonomous Region in Western China.³ These concerns have been expressed by the UN's High Commissioner for Human Rights, who found that there is "large-scale arbitrary deprivation of liberty of members of Uyghur and other predominantly Muslim communities" in Xinjiang.⁴

Modern slavery risk exists throughout the solar panel supply chain, from extracting critical minerals to manufacturing modules. ARENA's Modern Slavery Statement notes the connection between solar-grade polysilicon and Uyghur forced labour.⁵ It has been reported that state-sponsored forced labour is being widely used in the mining and production of

¹ Walk Free (2022) Global Slavery Index - Global Findings. Available at:

<https://www.walkfree.org/global-slavery-index/findings/global-find>

² NSW Gov (2023) NSW Anti-slavery Commissioner and Clean Energy Council join forces to tackle modern slavery risks in renewables. Available at:

<https://dcj.nsw.gov.au/legal-and-justice/our-commissioners/anti-slavery-commissioner/news-and-media/nsw-anti-slavery-commissioner-clean-energy-council-renewables.html#:~:text=In%20an%20Australian%20first%2C%20the.in%20renewable%20energy%20value%2Dchains>

³ United Nations (2022) OHCHR Assessment of human rights concerns in the Xinjiang Uyghur Autonomous Region, People's Republic of China. Available at:

<https://www.ohchr.org/sites/default/files/documents/countries/2022-08-31/22-08-31-final-assessment.pdf>

⁴ Ibid

⁵ ARENA (2022) Modern Slavery Statement For Financial Year 21-22. Available at:

<https://modernslaveryregister.gov.au/statements/11819/>

metallurgical grade silicon and solar-grade polysilicon.⁶ The scale of product that is linked to these inputs is significant. For example, solar-grade polysilicon is the primary material in 95% of solar modules,⁷ of which up to 32% of the world's metallurgical-grade silicon and 35% of solar-grade silicon comes from Xinjiang.⁸ Moreover, research conducted by Sheffield Hallam University has identified several companies with high risks of modern slavery, many of which are key suppliers in the Australian market.^{9 10}

The Solar to Silicon report highlights Australia's dependence on Chinese solar panels, and human rights violations in the solar value chain as reasons for developing Australia's industry.¹¹ Currently, the Sunshot program focuses on the supply chain starting from the production of polysilicon to the manufacturing of solar modules. However, the risk of modern slavery begins at the point of extracting critical minerals. A report from Sheffield Hallam University stated that quartz mining is one of the most likely supply chain segments to transfer Uyghur Region exposure to the entire solar supply chain.¹² Silicon (natural form as quartz) is one of the minerals listed on Australia's Critical Mineral list that has high geological potential.¹³

Recommendations

Based on these reasons, we recommend to the Sunshot Program the following:

⁶ Cockayne, J. (2022) Making Xinjiang Sanctions Work: Addressing forced labour through coercive trade and finance measures. University of Nottingham. Available at: <https://www.xinjiangsanctions.info/wp-content/uploads/2022/07/Making-Xinjiang-Sanctions-Work-FINAL.pdf>

⁷ Murphy, L & Elima, N. (2021) In Broad Daylight. Sheffield Hallam University. Available at: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/in-broad-daylight>

⁸ Crawford, A. & Murphy, L. (2023) Overexposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing. Sheffield Hallam University. Available at: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>

⁹ Ibid

¹⁰ Hill, J. (2023) Australia's top 10 most installed solar panels and inverter brands, One Step off the Grid. Available at: <https://onestepoffthegrid.com.au/australias-top-10-most-installed-solar-panels-and-inverter-brands/>

¹¹ Australian PV Institute (2023) Silicon to Solar Foundations for Solar PV Manufacturing in Australia. Available at: <https://apvi.org.au/wp-content/uploads/2024/02/S2S-Foundations-for-Solar-PV-Manufacturing-in-Australia.pdf>

¹² Crawford, A. & Murphy, L. (2023) Overexposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing. Sheffield Hallam University. Available at: <https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>

¹³ Australian Government (2024) Australia's Critical Minerals List and Strategic Materials List. Available at: <https://www.industry.gov.au/publications/australias-critical-minerals-list-and-strategic-materials-list>

- 1) Include the extraction and supply of quartz, metallurgical grade and solar grade silicon, as a priority area for funding in the supply chain; and
- 2) Prioritise areas of global value chains with high risks of modern slavery exposure and limited supply alternatives, such as the processing of quartz to metallurgical grade and solar grade silicon.

Question 5.1

ARENA sought feedback on Round 1's objectives, which were listed in the consultation paper as:

- Support a resilient and integrated domestic solar PV industry and build Australia's solar manufacturing capability.
- Support innovation and use of advanced automation in PV module manufacturing.
- Reduce barriers to domestic solar PV module manufacturing.
- Enhance sustainable and competitive solar PV module manufacturing, having regard for long-term economic, social, and environmental sustainability.

Question 5.1: Are any of these objectives not relevant, and/or are any relevant objectives missing?

The Solar to Silicon report recognises China's dominance in the solar manufacturing market, along with Australia's reliance on Chinese solar panels, as a reason for Australia to establish its own industry.¹⁴ One significant barrier mentioned throughout was the "higher cost of production compared to existing incumbents in China"; notably only 2% of the cost in module manufacturing in China is attributed to labour.¹⁵ Australia cannot compete with China in terms of cost, but could compete on the basis of strong environmental, social, and labour credentials. Australia's Critical Minerals Strategy 2023-2030 notes the importance of Australian industry "maintaining social licence" to operate, and "promoting Australia as a world leader in ESG".¹⁶ In this light, there is a policy coherence argument, alongside the moral and economic case, to be made for the Sunshot program's objectives to put human rights on the agenda.

Sunshot projects will be funded by taxpayers funds, so government agencies have an obligation to use these funds in line with community values. It is clear from the Modern Slavery Act that the community expects Federal Government agencies to take reasonable steps to ensure there is no modern slavery connected to their spending.¹⁷ Our shared values

¹⁴ Australian PV Institute (2023) Silicon to Solar Foundations for Solar PV Manufacturing in Australia. Available at: <https://apvi.org.au/wp-content/uploads/2024/02/S2S-Foundations-for-Solar-PV-Manufacturing-in-Australia.pdf>

¹⁵ Ibid

¹⁶ Australian Government (2023) Critical Minerals Strategy 2023–2030. Available at: <https://www.industry.gov.au/publications/critical-minerals-strategy-2023-2030>

¹⁷ Modern Slavery Act (2018) No. 153. Available at: <https://modernslaveryregister.gov.au/resources/Modern.Slavery.Act.2018.pdf>

require that we put every effort into ensuring that Australia's solar industry is not built on the exploitation of others.

The US and EU are increasingly demanding green and clean products, presenting an opportunity for Australia to step in to fill the supply gap. Both the US and EU have stringent regulations concerning environmental and human rights issues in supply chains. The US enacted the "Uyghur Forced Labour Prevention Act" in 2021, creating a rebuttable presumption that the importation of any goods mined, produced, or manufactured wholly or in part in the Xinjiang region would be prohibited under US law.¹⁸ Furthermore, the EU is increasingly enforcing environmental and human rights standards as they relate to imports. Earlier this year, the EU passed a regulation prohibiting the sale, import, or export of products involving forced labour in their supply chains.¹⁹ The EU also adopted the Corporate Sustainability Due Diligence Directive, requiring companies to conduct due diligence on climate and human rights throughout their entire chain of activities.²⁰

The Solar to Silicon report highlights that establishing a solar manufacturing industry would enable Australia to be part of a "globally diversified supply chain exporting particularly to the rapidly growing US and EU markets".²¹ This is crucial considering the current areas of the supply chain being considered for support (manufacturing polysilicon to modules), because they require sourcing critical minerals. According to a report from Sheffield Hallam University, quartz mining is one of the most likely segments that exposes the down-stream solar supply chain to state-sponsored forced labour programs in Xinjiang.²² If such activities are at any point in Australia's supply chain, it would severely compromise its ability to leverage its environmental, social, and labour credentials to export to the EU and US.

We support the current objective "Enhance sustainable and competitive PV module manufacturing, having regard for long-term economic, social, and environmental sustainability". Given the international scale of modern slavery risks in supply chains, we suggest expanding from focusing on the Australian context to a more global perspective.

¹⁸ Congressional Research Service (2023) Section 307 and Imports Produced by Forced Labor. Available at: [https://crsreports.congress.gov/product/pdf/IF/IF11360#:~:text=Section%20307%20of%20the%20Tariff,\(CBP\)%20enforces%20the%20prohibition](https://crsreports.congress.gov/product/pdf/IF/IF11360#:~:text=Section%20307%20of%20the%20Tariff,(CBP)%20enforces%20the%20prohibition).

¹⁹ Prohibiting products made with forced labour on the Union market (2024) P9_TA(2024)0309. Available at: https://www.europarl.europa.eu/doceo/document/TA-9-2024-0309_EN.pdf

²⁰ Corporate Sustainability Due Diligence and amending Directive (2024) EU)2019/1937. Available at:

https://www.europarl.europa.eu/doceo/document/TA-9-2024-0329_EN.html#title2

²¹ Australian PV Institute (2023) Silicon to Solar Foundations for Solar PV Manufacturing in Australia. Available at:

<https://apvi.org.au/wp-content/uploads/2024/02/S2S-Foundations-for-Solar-PV-Manufacturing-in-Australia.pdf>

²² Crawford, A. & Murphy, L. (2023) Overexposed: Uyghur Region Exposure Assessment for Solar Industry Sourcing. Sheffield Hallam University. Available at:

<https://www.shu.ac.uk/helena-kennedy-centre-international-justice/research-and-projects/all-projects/over-exposed>

Recommendations

We recommend making the following changes:

- 1) Extend the description of “Enhance sustainable and competitive PV module manufacturing, having regard for long-term economic, social, and environmental sustainability” to include explicit mention of “human rights and labour” considerations.
- 2) Add the following objective: “Create an Australian solar supply chain that competes on the basis of strong environmental, social and labour credentials.”

Question 9.1

ARENA asked for feedback on the eligibility criteria for funding in Round 1. These criteria are essentially criteria that an organisation must meet to qualify for funding. The current criteria are listed in the box below:

Round 1 Eligibility Criteria	
Applicant	<ul style="list-style-type: none">• Applicants must:<ul style="list-style-type: none">◦ hold an Australian Business Number (ABN); and◦ be an Australian entity incorporated under the <i>Corporations Act 2001</i> (Cth)
Project	<ul style="list-style-type: none">• Must be located within Australia.• Funding will be only eligible for new and/or additional solar PV module manufacturing capacity. The facility may utilise existing land, buildings, energy generation, or infrastructure. Where an existing facility is expanded, funding will not be available to support existing production capacity.
Technology	<ul style="list-style-type: none">• Applicants must warrant that modules will comply with Australian and international solar module testing and certification processes and be approved for use under the Small-scale Renewable Energy Scheme by the Clean Energy Council (or other authority, as the case may be).
Other	<ul style="list-style-type: none">• Applicants must comply with all relevant workplace and industry legislation, including Modern Day Slavery obligations, and the <i>Workplace Gender Equality Act 2012</i> (Cth).• Applicants must retain all the relevant Intellectual Property (IP) rights and comply with IP laws.• Applicants must declare any legal proceedings or sanctions that have occurred involving the entity or its senior officials in the last 5 years or are currently underway.• Applicants must consent to developing a Knowledge Sharing Plan with ARENA to reflect on the project and share (non-commercially sensitive) learnings publicly.

9.1: Do the Eligibility Criteria seem reasonable? Are there any additional criteria you would add to the list, or criteria that may be challenging to achieve? For example, should facilities have a minimum or maximum annual production capacity?

The Australian government has expressed a policy commitment to furthering responsible business practices, both in government procurement but also in private industry. This is expressed through the Australian Government having committed to the United Nations Guiding Principles on Business and Human Rights (UNGPs) and to “promoting and implementing” the OECD Guidelines for Multinational Enterprises on Responsible Business

Conduct (OECD Guidelines).^{23 24} It is critical that ARENA reflect this policy commitment in framing up the Eligibility Criteria for the Solar SunShot.

For this reason, we support the current Eligibility Criteria that require applicants to comply with Modern Slavery obligations, such as the Modern Slavery Act which seeks to encourage responsible business practices regarding supply chains.²⁵ However, it is important to consider the limits of the Modern Slavery Act regime, and how that may limit its relevance to the SunShot.

First, the Modern Slavery Act applies only to companies with an annual turnover of \$100m or more. ARENA is covered by this Act and is therefore required to annually report on steps they take to mitigate modern slavery risks in their supply chains. However, it is likely that Sunshot will be engaging with entities with a turnover below this threshold. Companies that do not meet this threshold therefore have no obligations under the Act to report on their risk mitigation actions. Without specific eligibility criteria to cover this gap, ARENA will lack visibility into whether applicants have taken any steps to avoid high-risk inputs to manufacturing, which would have implications for ARENA's own Modern Slavery Statement. This gap would also be inconsistent with the current government's policy commitment to address modern slavery risk in supply chains, including through government procurement.²⁶

Second, while reforms have been foreshadowed, at present, the Modern Slavery Act is a *reporting* regime, rather than requiring due diligence steps to be taken in line with Australia's commitments under the UNGPs and OECD Guidance. The Federal Government has committed to implementing suggestions of a 2023 review that recommended shifting the regime from "reporting" to focusing on due diligence, but this has not occurred yet.²⁷ This is important in the context of SunShot Round 1 that will prioritise module manufacturing, because these projects will need to source inputs further up the supply chain (critical minerals, mg-Si, Poly-Si, wafers, and cells), which have high risks of modern slavery as discussed in question 1.1. Without specific Eligibility Criteria to cover this gap, ARENA may be unable to assess the seriousness of any individual applicant's due diligence efforts to avoid use of high risk inputs in manufacturing.

²³ Australian Government (2024) OECD Guidelines. Available at: <https://ausncp.gov.au/responsible-business-conduct/oecd-guidelines#:~:text=The%20Australian%20Government%20is%20committed,economic%2C%20environmental%20and%20social%20progress>

²⁴ Australian Human Rights Commission (2016) Implementing the UN Guiding Principles on Business and Human Rights in Australia. Available at: <https://humanrights.gov.au/sites/default/files/Implementing%20UNGPs%20in%20Australia%20-%20Joint%20Civil%20Society%20Statement.pdf>

²⁵ Modern Slavery Act (2018) No. 153. Available at: <https://modernslaveryregister.gov.au/resources/Modern.Slavery.Act.2018.pdf>

²⁶ Attorney General's Department (2024) Investing in access to justice and improving community safety. Available at: <https://ministers.ag.gov.au/media-centre/investing-access-justice-and-improving-community-safety-14-05-2024>

²⁷ Professor John McMillan (2023) Report of the statutory review of the Modern Slavery Act 2018 (Cth). Available at: <https://www.ag.gov.au/sites/default/files/2023-05/Report%20-%20Statutory%20Review%20of%20the%20Modern%20Slavery%20Act%202018.PDF>

Recommendations

For these reasons, we suggest adding the following Eligibility Criteria, that effectively fills the gaps noted above:

“All applicants must demonstrate their commitment to taking reasonable steps to give effect to the UNGP BHRs and OECD Guidelines.”

There are increasing numbers of resources that offer insights into what "reasonable steps to give effect to the UNGPs and OECD Guidelines" might entail, with a specific focus on modern slavery risk. These are listed in question 18.2.

Question 18.2

ARENA were interested in understanding what additional support may be required to enable development of other stages of the solar supply chain.

18.2: What complementary support will be required to meet the objectives of the Program across the solar PV supply chain?

There are several complementary support mechanisms that the Sunshot program may want to reference or refer applicants to. These include, but are not limited to:

1. Under the Modern Slavery Act, a Federal Anti-Slavery Commissioner was established on 28th May 2024, and the recruitment process will begin shortly.²⁸ The Commissioner's functions include: supporting Australian entities to address risks of modern slavery in their operations and supply chains; consult and liaise with Commonwealth agencies on matters relating to modern slavery; and to advocate to the Commonwealth Government on continuous improvement in policy and practice.²⁹
2. The NSW Anti-Slavery Commissioner's 5 year term began in 2022, whose functions include: supporting public entities to tackle modern slavery risks in operations and supply-chains; and providing advice and training.³⁰
3. The NSW Anti-Slavery Commissioner has developed several tools and guides which may be useful, as listed below:
 - a. The Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains. This outlines seven comprehensive steps for

²⁸ Attorney General's Department (2024) Albanese Government establishes Anti-Slavery Commissioner. Available at: <https://ministers.ag.gov.au/media-centre/albanese-government-establishes-anti-slavery-commissioner-28-05-2024>

²⁹ Allison, K. (2024) Modern Slavery Amendment (Australian Anti-Slavery Commissioner) (2023) Bill Digest No. 39. Available at: https://parlinfo.aph.gov.au/parlInfo/download/legislation/billsdgs/9566372/upload_binary/9566372.pdf

³⁰ NSW Government (2022) NSW Anti-slavery Commissioner. Available at: <https://dcj.nsw.gov.au/legal-and-justice/our-commissioners/anti-slavery-commissioner.html>

- entities' to manage modern slavery risks and provides practical tools, such as a risk identification tool and model contract clauses.³¹
- b. The Clean Energy Council and NSW Anti-Slavery Commissioner are developing a Code of Practice on Procuring Renewables, a draft of which should be available in the second half of 2024. The Anti-Slavery Commissioner has signalled that they will also develop sector-specific guidance, including for solar panels.³²
 4. The NSW Small Business Commissioner has considered the role of addressing modern slavery in supply chains from a SME perspective. The Commissioner has developed a help sheet for SMEs who supply to organisations that have modern slavery obligations under legislation.³³
 5. The QLD Government's Modern Slavery Toolkit. The toolkit is used by public procurers in QLD and includes procurement planning questions, sample contract clauses, protocol for reporting modern slavery, a supplier self-assessment questionnaire and a supplier Code of Conduct.³⁴
 6. Lists of entities that have been found to use modern slavery. Examples include the US's Uyghur Forced Labor Prevention Act Entity List,³⁵ Brazil's Dirty List,³⁶ and the EU's Forced Labour Single Portal (currently under construction).³⁷

³¹ NSW Government (2024) Guidance on reducing modern slavery in supply chains.

Available at:

<https://www.info.buy.nsw.gov.au/resources/guidance-on-reducing-modern-slavery-in-supply-chains>

³² NSW Gov (2023) NSW Anti-slavery Commissioner and Clean Energy Council join forces to tackle modern slavery risks in renewables. Available at:

<https://dcj.nsw.gov.au/legal-and-justice/our-commissioners/anti-slavery-commissioner/news-and-media/nsw-anti-slavery-commissioner-clean-energy-council-renewables.html#:~:text=In%20an%20Australian%20first%2C%20the,in%20renewable%20energy%20value%2Dchains>

³³ NSW Government (2021) Modern Slavery Information for small business. Available at:

https://www.smallbusiness.nsw.gov.au/sites/default/files/2023-07/15799_SBC%20PP%20Modern%20Slavery%20Fact%20Sheet%20ACCESSIBLE_updated%2018.07.23.pdf

³⁴ QLD Government (2023) Eliminating modern slavery in government supply chains.

Available at:

<https://www.forgov.qld.gov.au/finance-and-procurement/procurement/procurement-resources/procurement-policies-and-frameworks/eliminating-modern-slavery>

³⁵ Homeland Security (2024) UFLPA Entity List. Available at:

<https://www.dhs.gov/uflpa-entity-list>

³⁶ Brazil Gov (2023) MTE updates the Register of Employers who subjected workers to conditions similar to slavery. Available at:

https://www.gov.br.translate.google/trabalho-e-emprego/pt-br/noticias-e-conteudo/2023/outubro/mte-atualiza-o-cadastro-de-empregadores-que-submeteram-trabalhadores-a-condicoes-analogas-a-escravidao?x_tr_sl=pt&x_tr_tl=en&x_tr_hl=en&x_tr_pto=sc

³⁷ European Parliament News (2024) Deal on EU ban on products made with forced labour.

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<https://www.europarl.europa.eu/news/en/press-room/20240301IPR18592/deal-on-eu-ban-on-products-made-with-forced-labour>

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<https://ausncp.gov.au/responsible-business-conduct/oecd-guidelines#:~:text=The%20Australian%20Government%20is%20committed,economic%2C%20environmental%20and%20social%20progress>

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https://www.gov.br.translate.google/trabalho-e-emprego/pt-br/noticias-e-conteudo/2023/outubro/mte-atualiza-o-cadastro-de-empregadores-que-submeteram-trabalhadores-a-condicoes-analogas-a-escravidao?_x_tr_sl=pt&_x_tr_tl=en&_x_tr_hl=en&_x_tr_pto=sc

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Congressional Research Service (2023) Section 307 and Imports Produced by Forced Labor. Available at:

[https://crsreports.congress.gov/product/pdf/IF/IF11360#:~:text=Section%20307%20of%20the%20Tariff,\(CBP\)%20enforces%20the%20prohibition.](https://crsreports.congress.gov/product/pdf/IF/IF11360#:~:text=Section%20307%20of%20the%20Tariff,(CBP)%20enforces%20the%20prohibition.)

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NSW Government (2022) NSW Anti-slavery Commissioner. Available at:

<https://dcj.nsw.gov.au/legal-and-justice/our-commissioners/anti-slavery-commissioner.html>

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