

# MODERN SLAVERY

Article 1 of 4

# Modern Slavery Compliance

## Why Every Australian Farm Must Act Now

This is the first article in AtOne AGRI's four-part series designed to give Australian agribusinesses a clear, practical roadmap for navigating modern slavery compliance.

Whether you run a small family farm, a mid-size operation, or a large enterprise approaching the \$100M reporting threshold, the landscape is shifting and the businesses that act early will be the ones that stay competitive, compliant, and commercially secure.

Over the next three articles, we'll break down exactly what farms of different sizes must do to stay compliant, protect their workforce, and meet the rapidly rising expectations of supermarkets, regulators, and export markets.

Before diving into size-specific guidance in Articles 2 to 4, this opening article explains **why modern slavery has become one of the most important operational risks in Australian agriculture**, and why every farm, regardless of revenue needs to take this seriously now.

### Why Modern Slavery Is Now a Front-Line Issue for Farms

Modern slavery legislation is no longer something that only affects large corporates. Agriculture has been explicitly identified as a high-risk sector, and the reasons are clear:

- Heavy reliance on seasonal and migrant labour.
- Widespread use of labour hire contractors.
- Remote locations with limited oversight.
- Multi-country supply chains.
- Workers who may be isolated, visa-dependent, or unfamiliar with Australian laws.

These factors create conditions where exploitation can occur without operators ever intending it or even realising it's happening — and regulators are paying attention.

#### *Anti-Slavery Commissioner*

With Australia's first Anti-Slavery Commissioner appointed and financial penalties on the way, scrutiny is increasing rapidly.

- Supermarkets and export markets are tightening their requirements.
- Supplier audits are becoming more frequent and more detailed.

**In Short:** Modern slavery compliance is now a commercial reality for every Australian farm.

## What Modern Slavery Looks Like in Agriculture

Modern slavery isn't limited to extreme or criminal cases. In agriculture, it often appears in more subtle, but still serious forms:

- Underpayment through contractor arrangements.
- Excessive deductions for accommodation or transport.
- Workers pressured to continue working while injured.
- Recruitment fees that trap workers in debt.
- Unsafe, overcrowded, or employer-controlled accommodation.
- Passport confiscation or restricted freedom of movement.

These issues have been documented repeatedly across Australian farms. Even well-run operations can be exposed simply because they rely on labour hire, seasonal workers, or offshore inputs.

**This series exists to help you understand where those risks sit and what practical steps you can take to protect your business.**

## The Law Is Changing & Farms Need to Prepare Now

Under the current Modern Slavery Act, only entities with \$100M+ revenue must submit a formal statement, but that threshold is no longer the safety buffer it once was.

Major reforms are already in motion:

- Financial penalties for non-compliance.
- Increased enforcement by the Anti-Slavery Commissioner.
- Potential declaration of agriculture as a formally high-risk sector.
- Stronger due diligence requirements.
- Supermarkets and exporters pushing obligations down the supply chain.

Even if your farm is well below the reporting threshold, your customers may require you to demonstrate compliance as a condition of supply.

This series will break down exactly what that means for:

- Family farms & operations under \$10M (Article 2).
- Mid-size agribusinesses (\$10M–\$100M) (Article 3).
- Large operations and those approaching \$100M (Article 4).

## The Six Risk Areas Every Farm Must Understand

Across the industry, the same high-risk areas appear again and again:

1. **Labour Hire Contractors** – outsourcing does not remove your liability.
2. **Seasonal & Migrant Workers** – often the most vulnerable.
3. **Accommodation & Transport** – inflated charges can create debt bondage.
4. **Piece-Rate Pay** – legal, but high-risk if workers fall below minimum wage.
5. **Offshore Supply Chains** – fertilisers, chemicals, packaging, machinery.
6. **Sub-Contractors & Processors** – risks extend beyond the farm gate.

These areas will be explored in more detail throughout the series, with tailored guidance for each business size.

## The Overlooked Link Between WHS and Modern Slavery

One of the most important insights for farm operators is the connection between WHS and modern slavery risks.

Workers who are vulnerable, visa-dependent, accommodation dependent, or in debt are the least likely to:

- Report injuries
- Raise safety concerns
- Participate in WHS consultations

This means low incident rates can be misleading. A “quiet” workforce may not be a safe workforce - it may be a workforce that doesn't feel safe enough to speak up.

Understanding this link is essential to building a compliance system that actually works.

## Your Practical 5-Step Starting Point

Regardless of your size, these five steps form the foundation of a credible modern slavery response:

1. **Map your workforce and labour arrangements.**
2. **Identify vulnerable workers.**
3. **Review labour hire and contractor agreements.**
4. **Create a simple grievance mechanism.**
5. **Document your actions and decisions.**

These steps will prepare you for the more detailed guidance in Articles 2 to 4.

## What's at Stake for Farms That Don't Act

The consequences of inaction are growing:

- Loss of supermarket supplier accreditation.
- Exclusion from export markets.
- Fair Work Ombudsman investigations.
- Media exposure.
- Criminal liability for serious cases.
- Reputational damage with customers and the community.

The farms that act early will be the ones that remain competitive, compliant, and trusted.

## Coming Up in This Series

- **Article 2:** Family Farms & Operations Under \$10M
- **Article 3:** Mid-Size Agribusinesses (\$10M–\$100M)
- **Article 4:** Large Operations & Those Approaching the \$100M Threshold

Each article provides tailored, practical guidance for your business size.

## Final Thoughts

### How AtOne AGRI Can Support You

At the end of the day, modern slavery compliance doesn't need to be overwhelming - but it does need to be done properly. AtOne AGRI specialises in practical, farm-ready compliance solutions that integrate Modern Slavery, WHS, HR, and Contractor Management into one cohesive approach.

We can help you:

- Assess your workforce and supply chain risks.
- Strengthen Labour Hire and Contractor arrangements.
- Build grievance and reporting mechanisms.
- Integrate WHS and Modern Slavery systems.
- Prepare for supermarket or export audits.

Develop or improve your Modern Slavery Statement.