

Response to Productivity Commission Draft Report

Migrant Intake into Australia

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1. Introduction

It is important that no one refer to this report as a study or an assessment of Migrant Intake into Australia. This report has been written as a review of existing government migration policy with a slight tweaking of methods, without investigating or analysing the critical issues around migration and population. The first sentence of the terms of reference state this quite clearly. The title, though, is misleading in that it implies a broader scope for the report relating to all aspects of migrant intake into Australia. It is recommended that the title be changed to **Productivity Commission Inquiry into the Use of Charges to Determine the Intake of Migrants** as is shown as the title in the Terms of Reference.

2. Confusion Regarding the Scope of the Inquiry

Further down the Terms of Reference page, under the heading *Scope of the Inquiry*, some broader requirements for assessing the impacts of migration are included. The impacts are primarily economic and primarily as they relate to government costs, but there is a reference to “living standards of Australian citizens” with respect to “environmental, amenity and congestion effects.” That implies that the entire matter of impacts of migration will be considered. If the overall impacts are to be considered it might be fair to assume that the decision about whether high immigration to Australia has not yet been determined. That is clearly not the case. The entire report takes the position that high immigration is the only policy path for the Australian government and the only decisions left for consideration are how to best implement that high immigration, including whether fees for migrants are to be included.

3. Critical Questions to be Answered

If there is going to be an assessment of the overall impacts of migrant intake, the inquiry must consider the question of overall population and sustainability. Does Australia have a policy for being sustainable in the future? How can Australia be sustainable with a continuously increasing population driven primarily by high immigration?

Proponents of sustainable policies often say “you can’t have continuous population growth on a finite planet.” This statement is never refuted, it is simply ignored. It is ignored again in this report. High immigration promotes population growth, which is unsustainable. Nowhere in this draft report of 571 pages are the absolutely critical questions regarding sustainability in the future, discussed or commented on.

It is understood that the most significant impacts of high population growth are most likely to occur in 20 to 30 years in the future. If the terms of reference for the report are limited to only the next election cycle and impacts that will affect the re-election chances of the existing government, then this should be clearly stated in the terms of reference.

4. Draft Report Bias toward high levels of Immigration

The Report has been written with a strong bias toward continuing high levels of immigration into Australia.

Factors that support continued high levels of immigration such as the contentious claim that there will be short term economic improvement are reported as if there is absolutely no question about their validity.

Factors such as environmental degradation, congestion and increased housing prices that are negatives to high immigration, are reported as:

- Not very serious
- Perhaps true in some cases, but then
- Easily corrected with good government policies

4.1 Bias in the Scope of the Inquiry

It is unsurprising that the PC has produced a draft report biased toward continued high immigration because that is the way that the Scope of the Inquiry is written (Page 4 of 571):

The Australian Government's objectives in commissioning this inquiry are to examine and identify future options for the intake of temporary and permanent entrants that improve the income, wealth and living standards of Australian citizens, improve the budgets and balance sheets of Australian governments, minimise administration and compliance costs associated with immigration, and provide pathways both for Australian citizens to be altruistic towards foreigners including refugees, and for Australia's international responsibilities and obligations to foreign residents to be met.

a) The scope says "identify future options for the intake of temporary and permanent entrants." There is never a question as to whether "temporary and permanent entrants" is a good idea, that determination has already been made. The implication is that this inquiry should just determine how the process can be improved.

b) The priorities are improving "income, wealth and living standards." With the first two focussing on economic benefits, the government has told the PC to focus on the short term economic benefits for existing businesses that result from more low wage workers and more consumers. With living standards being the third priority, living standards being very hard to quantify and living standards including income, the PC can effectively disregard living standards from the analysis.

c) "improve the budgets and balance sheets of Australian governments" again considers short term economic impacts.

d) "minimise administration and compliance costs associated with immigration, and provide pathways both for Australian citizens to be altruistic towards foreigners including

refugees, and for Australia’s international responsibilities and obligations to foreign residents to be met” is all about decisions that have already been made to continue high immigration.

4.2 Draft Findings

The first Draft Finding (4.1 on page 47 of 571)

Decisions about the level of immigration are the responsibility of the Australian Government. They involve balancing a complex set of economic, social and environmental policy objectives.

There is no comprehensive empirical basis for setting an aggregate level of immigration over time that would improve the wellbeing of the Australian community. Improving incumbents’ wellbeing is likely to be consistent with a range of immigration rates, which is determined (among other things) by the efficiency of the provision of infrastructure, the efficiency of the labour market, technology, settlement services and external factors.

This statement, as the first Draft Finding and the first finding that readers of the report are likely to see, is designed to tell the public to shut up and butt out, the government will continue to go on with its high immigration policies. There is no requirement to have one “comprehensive empirical basis for setting an aggregate level of immigration.” This statement is designed to say “this issue is too difficult for the average citizen to comprehend,” and act as a barrier to criticisms of the governments high immigration policies.

Saying that “improving incumbents’ wellbeing is consistent with a range of immigration rates” is like saying “there is no correct answer to this question so just leave us alone and everything will be just fine.” That just isn’t true. High immigration leads to a broad range of negative impacts on “incumbent’s wellbeing” and very few long term positive impacts.

The negative impacts were outlined in detail in my previous submission. A quick summary is:

- Land Degradation
- Loss of Forests
- Loss of Wilderness
- Loss of Topsoil (recent National Geographic article says one third of the earth’s topsoil has been lost since 1960)
- Loss of Fisheries
- Loss of Groundwater
- Loss of Surface Water
- Loss of Biodiversity
- Increase in Air Pollution
- Increase in Water Pollution
- Increase in Greenhouse Gas Generation
- Loss of Wetlands
- Increase in Congestion

- Increase in House prices and Land prices
- Magnifies difficulties in town and infrastructure planning

Although not part of the terms of reference, Australia's high immigration policy is also damaging internationally because it endeavours to take the best people from developing countries. These are the people who could best help these poor countries become prosperous. A better policy would be to help them succeed in their own countries rather than pinching them to help make Australia richer. It also tells developing countries with more serious population issues than Australia that high population growth must not be a serious long term problem requiring policy changes to remedy.

5. Review of Responses

A statement made in Section 4.2 (page 133 of 571) of the draft report is at worst a straight out lie by the Productivity Commission and at best it is a clumsy deception with the intention of tricking the reader into believing that a substantial majority of respondents to the inquiry want high immigration. The paragraph is as follows:

While a small number of inquiry participants did not agree with the notion of sustainable population growth (Green, sub. 38; and O'Sullivan, sub. 54), the Commission's view is that a focus on sustainable population growth (including through immigration) ensures that concerns about the adverse effects of population levels and growth on the economic, social and environmental aspects of migration are taken into account in policy deliberations.

The Productivity commission writes that "a small number of inquiry participants did not agree with the notion of sustainable population growth." This sentence is designed to lead the reader to believe that almost all of the submissions to the inquiry favoured high immigration. That is simply not true.

An analysis of each submission reveals that 21 submissions were against high immigration / in favour of cutting immigration and 18 submissions were happy with the existing system of high immigration. There is no way any rational person would call the majority a small number unless they were intending to deceive the reader. There were 67 submissions in total. Even using 21 out of all 67 submissions, no fair assessment would call 31% a small number.

The initial submissions break down this way:

Category	Tot	Submission Number of each submission in each category
In favour of existing system of high immigration	18	8,10,11,12,19,28, 45,49,50,51, 53, 57, 59,60,61,62, 64,65
In favour of reducing Immigration	21	3,4,5,15,17,21,25,26,27,29, 37, 38,39,41,44,48,54,56,58,63,67
Primarily writing about other issues, but some indication favouring existing system	8	30,31,34, 42,46,52,55,56
No recommendation, Writing about other aspects of immigration policy	20	1,2,6,7,9,13,14,16,18,20,22,23,24, 32,33,35,36,40,43,47
total	67	

My opinion is that it is dishonest to say a small number even with 21 out of 67 submissions. The more appropriate ratio is 21 out of 39. The way that the statement is made implies that the number of submissions in favour of reducing immigration was so small it can be disregarded. That is just simply a lie. The Productivity Commission is acting as an arm of the existing government rather than as an independent agency making an honest inquiry.

The post draft submissions break down with even more support for low immigration.

Category	Total	Submission Number of each submission in each category
In favour of existing system of high immigration	11	75,85,89,90,95,99,100,101,103,104,105
In favour of reducing Immigration	17	69,70,71,74,76,79,81,82,83, 84,88,91,92,93,96,97,106
Primarily writing about other issues, but some indication favouring existing system	1	80
No recommendation, Writing about other aspects of immigration policy	11	68,72,73,77,78,86,87,94,98, 102,107
Total	40	

6. Conclusions

The great majority of Australian citizens would have a higher standard of living if immigration rates equalled emigration rates. High immigration causes substantial problems for the majority of Australia citizens.

High immigration tells the rest of the world that Australia's government sets policies that benefit only a small number of wealthy Australian's while disadvantaging the majority of Australians and the majority of the world's population.