

Community Legal Centres Australia submission to the Robodebt Royal Commission

3 February 2023



Community Legal Centres
Australia

About this submission

Community Legal Centres Australia welcomes this opportunity to make a submission to the Robodebt Royal Commission.

We have reviewed and endorse the substantive submissions and recommendations made, and evidence presented, to the Royal Commission and to several Senate inquiries into Centrelink's compliance program, by specialist social security legal services and their peak body, Economic Justice Australia, including:

- Economic Justice Australia's submission to the Royal Commission into the Robodebt Scheme (February 2023)
- Economic Justice Australia's submission to the Senate Community Affairs Reference Committee's inquiry into Centrelink's compliance program (October 2020)
- Statement of Genevieve Bolton, Economic Justice Australia
- Statement of Katherine Boyle, Welfare Rights Centre of NSW
- Statement of Catherine Eagle, Welfare Rights and Advocacy Service (WA).

Adopting these recommendations will ensure that we do not repeat the mistakes and harms caused by Robodebt in the future.

This submission focusses on the acute need for a substantial increase in federal funding for community legal centres to deliver social security legal services to:

- assist people experiencing financial and other forms of disadvantage to:
 - understand the accuracy and lawfulness of debts Centrelink raises against them
 - challenge Centrelink decisions about their entitlement to social security and debts they owe, particularly where those decisions have been made by automated systems
- address the overwhelming power and knowledge imbalances between the Federal Government and individual social security recipients in disputes about social security debts
- provide an additional layer of transparency and accountability over government decision-making in line with administrative law principles
- advocate reforms to the social security system ensure it operates fairly and to reduce poverty and disadvantage in our community.

The 'Robodebt' fiasco made clear the significant risks and human costs of allowing powerful government entities to develop and use an automated system to make and enforce decisions against individual citizens – many of whom faced poverty and disadvantage – without sufficient human or independent oversight. Although the Federal Court found this example of automated decision-making unlawful, governments will no doubt continue to use potentially flawed automated systems to deliver bureaucratic efficiencies and raise revenue. In an area of law as complex and specialised as social security, it is critical that the Federal Government directly invests in mechanisms and services, including specialist social security legal services, to help protect individual citizens against the reasonably foreseeable risks and harms inherent in automated decision-making and debt-raising by Centrelink.

Recommendations

Recommendation 1

The Federal Government should:

- a) Significantly increase its investment in specialist social security legal services to enable them to meet demand for assistance from people experiencing disadvantage who have been impacted by adverse social security or family assistance decisions, particularly in rural, regional, remote, and very remote communities.
- b) Work collaboratively with Economic Justice Australia and its members to ascertain the level of unmet need for social security legal services and the quantum of funding required to meet this need
- c) Provide increased, ongoing, funding to Economic Justice Australia, so that it can continue to provide expert social security advice to government and provide the full suite of capacity building and advocacy services its members expect from their national peak body.

Recommendation 2

The bulk of this increase in funding for specialist social security legal services should come from the Department of Social Services and should ensure equitable access to social security legal services to people in rural, regional, remote, and very remote communities.

Recommendation 3

The Attorney General's Department and Department of Social Services should work together to:

- a) Determine the most appropriate mechanism by which to share responsibility for funding community legal centres to deliver specialist social security legal services
- b) Minimise the duplication of administrative burdens and address the communication and other challenges that can arise for organisations required to report to multiple funding bodies.

Recommendation 4

The Robodebt Royal Commission should adopt the substantive recommendations made by Economic Justice Australia and its members in relation to using automated systems to make decisions about people's social security entitlements and debts, in submissions, witness statements, and other evidence presented at public hearings.

About community legal centres

Community Legal Centres Australia is the national representative voice for the community legal sector. We are an independent, non-profit organisation set up to support community legal services to provide high-quality, free, and accessible legal, and related services to everyday people, especially people experiencing poverty, disadvantage, discrimination or domestic or family violence.

Our members are the eight state and territory community legal sector peak bodies. Together, we represent about 170 community legal centres, women's legal services, Family Violence Prevention Legal Services and Aboriginal and Torres Strait Islander Legal Services operating in metropolitan, regional, rural, remote, and very remote communities across Australia. 'Generalist' community legal services assist people within a defined geographic region with a range of civil and family law problems, and some criminal law matters. 'Specialist' community legal services:

- assist people with specific legal issues (such as discrimination, employment, immigration, social security, or tenancy matters), or
- target services to specific groups (such as Aboriginal and Torres Strait Islander people, young people, older people, people with a disability or women)

Community legal centres are renowned for being cost-effective providers of highly regarded legal and related services. Client surveys show community legal centre services to be highly valued by clients. Our own impact measurement work demonstrates our assistance has positive impacts on their lives.

Our movement's vision is for a fair and equitable society in which:

- Our legal systems and institutions are accessible to all, decolonised, and no longer criminalise poverty, disadvantage, or disability
- All members of our community have access to the power, tools, and other resources to live safe, secure, and meaningful lives, free from discrimination, violence, exploitation, and abuse
- We respect and protect the rights of Aboriginal and Torres Strait Islander people and communities to land, language, culture, and self-determination
- We respect and protect the natural environment for current and future generations.

Our expertise is grounded in the stories of the nearly 200,000 people who engage our sector's services each year and who experience first-hand the barriers to justice that exist in our legal system. Our public advocacy ensures that their voices and experiences drive progressive system reform.

About specialist social security legal services

There are 14 specialist community legal services across Australia, which provide free and independent legal information, advice, legal and non-legal support, assistance, and representation to people who have been adversely affected by a decision made under social security and family assistance legislation. These services can represent clients at all stages of the internal and external appeals process and refer clients to other services for assistance with other legal and non-legal matters.

Four of these services specialise exclusively in social security and family assistance law, and only provide legal assistance to people about their social security and family assistance issues. These centres are Basic Rights QLD, Social Security Rights Victoria, Welfare Rights and Advocacy Service WA, and Welfare Rights Centre NSW. The remaining 10 are specialist social security legal services delivered by generalist community legal centres. Generally, these services are staffed by a standalone solicitor or caseworker. Generalist community legal centres that offer specialist social security legal services include Barwon Community Legal Service (Vic), Canberra Community Law, Darwin Community Legal Centre, Fremantle Community Legal Centre, Hobart Community Legal Service, Illawarra Community Legal Centre, Launceston Community Legal Centre, Sussex St Community Law Service (WA), Townsville Community Legal Service, and Uniting Communities South Australia.

The first specialist social security legal services were established in the 1980s. In 1990, the seven established centres, located in Adelaide, Brisbane, Canberra, Melbourne, Sydney, and Wollongong, formed the National Welfare Rights Network. The Network operated as an unfunded specialist peak body, advocating improvements to social security law and policy based on their frontline experience with clients and the Department of Social Services (and later Centrelink, and Services Australia).

Over the past 30 years, the number of specialist social security legal services has grown. The Network is incorporated and now operates as a small, funded specialist peak body, Economic Justice Australia (previously named the Social Security Rights Network). Economic Justice Australia's vision is for a fair social security system in Australia. It delivers this vision by:

- supporting its 21 members and associate members¹ (19 of which are community legal centres) to deliver high-quality legal services to people navigating the social security system
- Providing expert advice to Governments about, and advocating changes to, social security law, policy, and administration to improve the system's fairness and accessibility, achieve better outcomes for people who receive social security payments and improve lives by reducing poverty and disadvantage in Australia.²

¹ Economic Justice Australia's associate members do not provide specialist social security legal services directly but support the organisation's vision for a fair social security system. Six of its associate members are located in the Northern Territory where no community legal sector organisations receive specific funding to deliver social security legal services, despite high rates of reliance on social security payments, particularly amongst Aboriginal and Torres Strait Islander communities.

² Statement of Genevieve Bolton, Economic Justice Australia, at [16]-[17].

Impacts of the unlawful Robodebt Scheme

Unnecessary harm caused

Robodebt caused unnecessary harm to people and communities experiencing disadvantage

Social Security recipients include people experiencing multiple and intersecting forms of disadvantage: people living in poverty, people with psychosocial disability, single parents, carers, people experiencing homelessness, Aboriginal and Torres Strait Islander people, people living in regional, remote and very remote communities, people experiencing domestic and family violence, and refugees and recently arrived migrants with limited English and limited understanding of Australia's legal system.

As Economic Justice Australia noted in its Witness Statement to the Royal Commission:

The ultimate unfairness of the Robodebt scheme was its impact on people who were unable to access the online system and potentially avert the raising of a Robodebt, who were then denied the right to appeal, or frightened of the repercussions of appealing and were exposed to contacts from external debt recovery contractors. These vulnerabilities can also serve as barriers to accessing legal advice from free legal services – especially for people with psychosocial disability, and recent arrivals from countries with oppressive legal systems.³

Many such people simply accepted the debts raised against them under the Online Compliance Intervention Scheme (now known as 'Robodebt'), or succumbed to the aggressive tactics used by private debt collectors contracted by Centrelink to recover debts, paid them off using credit cards on Centrelink's advice (creating further financial hardship), and ultimately paid money to the Federal government they did not owe. Many experienced unnecessary confusion, fear, anxiety, and depression. As widely reported in the media at the time, some took their own lives after being issued with a Robodebt.⁴

We refer the Commissioner to the many case studies provided to the Royal Commission and to the Senate Community Affairs Reference Committee by Economic Justice Australia, Welfare Rights and Advocacy Service (WA), and Welfare Rights Centre NSW. In particular, the case studies of Sara,⁵ Danni,⁶ and Brianna,⁷ and the client statistics provided by Welfare Rights Centre NSW,⁸ clearly highlight the kinds of people subjected to Robodebts, and the harms they suffered as a result.

³ Statement of Genevieve Bolton, Economic Justice Australia, at [58].

⁴ See for example: this [7News story](#) from 2022, this [9News story](#) from 2020, and this [Guardian Australia article](#), also from 2020.

⁵ Statement of Catherine Eagle, Welfare Rights and Advocacy Service WA, at [37].

⁶ Statement of Catherine Eagle, Welfare Rights and Advocacy Service WA, at [40].

⁷ Economic Justice Australia, [Submission to the Senate Community Affairs Reference Committee's inquiry into Centrelink's online compliance program](#), October 2021, at [15].

⁸ In her statement on behalf of Welfare Rights Centres NSW, Katherine Boyle notes at [31] that during the period Robodebts were being issued 12% of their clients were experiencing or at risk of domestic or family violence; 37% had a disability; 19% were homeless or at risk of homelessness; 7% did not speak English or did not speak it well and 10% did not read English or did not read it well; 8% identified as Aboriginal or Torres Strait Islander; and 15% had no income at the time they contacted the Welfare Rights Centre for help with their debt.

Advocates raised concerns about the Robodebt Scheme's lawfulness immediately

Economic Justice Australia and its members began raising concerns about the lawfulness of the basis on which Robodebts were raised and recovered in early 2017. They continued to do so consistently through submissions to parliamentary inquiries and direct advocacy to Centrelink and Services Australia until 2020.⁹ Their concerns were based on several fundamental flaws in the system's design and administration:

- **The lack of human oversight of debts calculated and raised using an automated system.** Under Robodebt, debts were calculated using automated data-matching and income averaging processes and automatically raised where the annual income people reported to the Australian Taxation Office (ATO) (averaged across Centrelink payment fortnights) differed from the income people reported to Centrelink each fortnight in the period covered by the debt. This differed from the previous approach whereby mismatches between ATO and Centrelink income data triggered an internal review by Centrelink of payment accuracy rather than the automatic raising of a debt. The absence of human oversight of Robodebt decisions resulted in a higher proportion of inaccurate debts being raised and was ultimately deemed unlawful by the Federal Court of Australia in *Amato*.¹⁰
- **The use of historical data to raise debts without warning or preparation.** This caused undue anxiety and financial stress to many people issued with Robodebts. People's anxiety and stress were made worse by the fact that Centrelink and Services Australia advised people to repay the debts using credit cards in the first instance. This was inherently unfair and resulted in people going into further debt to repay money they often didn't owe.¹¹
- **The requirement that individuals disprove debts raised.** Despite Centrelink's coercive powers to collect evidence of income directly from employers, people were routinely told their debts could not be reviewed unless they provided evidence of income earned for every fortnight in the period to which the debt related. This further exacerbated the already significant power imbalance between Centrelink and Services Australia on the one hand and individual social security recipients on the other, and contravened fundamental principles of administrative law.

In submissions, Economic Justice Australia and individual social security legal services also noted that communication by Centrelink about how debts were calculated and recipients' rights to review was unclear and inconsistent. Further, frontline Centrelink workers' knowledge of the scheme and recipients' options to challenge decisions was poor. These factors resulted in frustration, confusion and, often, further financial hardship for recipients, who often simply accepted and repaid the debt.

⁹ See for example: National Social Security Rights Network's submissions to the Senate Social Affairs Committee's 2017 inquiry into the better management of the social security system initiative from [April 2017](#) and [May 2017](#) and Economic Justice Australia's submission to the same Committee's [2021 inquiry into Centrelink's compliance system](#).

¹⁰ *Deeanna Amato v The Commonwealth of Australia*, Federal Court of Australia, VID611/2019, 11 November 2019.

¹¹ Statement of Genevieve Bolton, Economic Justice Australia, at [51] – [59].

Unmet legal need increased

There is significant unmet legal need in Australia

Independent studies indicate significant levels of unmet legal need in Australia.¹² Like all legal assistance providers, community legal centres are underfunded to meet demand. Our own sector research¹³ has found that, on average, centres turn away 74 people per week. However, known turn-aways are just a fraction of overall unmet need. Our turn-away data counts people who cannot stay on hold long enough to speak to a practitioner or who decline an appointment because it is too far in the future. What we cannot know is how many people failed to even get through or did not bother to contact us because they knew the wait time would be too long.

Nationally, most funding for community legal centres and other legal assistance services – including specialist social security legal services – comes from the Federal Government. In some jurisdictions, centres are almost entirely dependent upon this funding. The Federal Government’s funding commitment is set out in the [National Legal Assistance Partnership Agreement \(NLAP\)](#). The current Agreement runs from 2020 – 2025, with an independent review due to commence in April 2023.

Since the start of the COVID pandemic, the pressures community legal centres experience due to chronic underfunding have been exacerbated by increased demand, rising inflation and rapidly increasing employment costs. The current NLAP provides fixed annual indexation on legal assistance funding contracts of 1.5% per annum, well below the current rate of inflation. Unfortunately, services funded under NLAP were excluded from the \$560million funding pool announced in the October 2022 Federal Budget designed to provide temporary relief for housing, Indigenous, and community services from the impacts of rising inflation. In addition, community legal centres face increased administrative costs arising from the Fair Work Ombudsman’s recent decision to increase award wages and increases to the mandatory superannuation guarantee (both welcome measures but inadequately compensated for through current funding mechanisms). This means many centres face an effective funding cut each year on year, making it even more difficult to maintain services and meet demand for legal assistance in their communities.

Demand for specialist social security legal services is overwhelming

Demand for specialist social security legal services is overwhelming. For example, Welfare Rights Centre NSW receives an average of a hundred calls a week from seventy people but can provide comprehensive advice to only twenty. They can offer only a fraction legal representation to challenge adverse decisions through internal Centrelink and external merits review processes. For the remainder they provide information only.

Unmet need is most pronounced in regional and remote Australia. Some regional and remote areas do not have funded, on-the-ground services providing social security legal advice and assistance. This leaves people without access to information, advice and advocacy on social security and family assistance issues, often in areas where rates of reliance on social security payments are higher than average. The Northern Territory (NT) is a prime example: none of the non-profit legal services in the NT – neither Aboriginal

¹² See for example the [Australian Productivity Commission’s Report into Access to Justice Arrangements 2014](#); and the [Law Council of Australia 2019-2020 Pre-Budget Submission](#).

¹³ Community Legal Centres Australia State of the Sector Survey 2019-20.

Legal Services, community legal centres nor the Legal Aid Commission – receive specific funding to provide social security legal help.

To provide a sense of the scale of demand, the caseload of the Social Security and Child Support Division of the (former) Administrative Appeals Tribunal is almost three times the size of the Tribunal's National Disability Insurance Scheme (NDIS) caseload.¹⁴ The matters it deals with are similar, and sometimes more complex. Unlike the NDIS, social security matters often carry with them the spectre of criminal prosecution.

Unlike other areas of specialist community legal centre practice, there is no private sector equivalent where people can go for social security legal advice or representation – pro bono or otherwise. This means that specialist social security legal services have nowhere to refer people for help with their social security problem if they are at capacity, which is increasingly the case. This means that more and more people are denied access to the specialist legal support they need.

Specialist social security legal services are chronically underfunded

In 1992-93, the Attorney General's Department established the Welfare Rights funding program, via a specific allocation of \$0.5 million from the Department of Social Services. Program funding grew to \$1.1 million in 1995-96.

Since 2015, specialist social security legal services have been funded through NLAP. Like most community legal services funded under NLAP, specialist social security legal services are chronically underfunded to meet demand. Economic Justice Australia believes that this is due, in part, to the fact that funding distributions under NLAPs have failed to recognise:

- the costs and challenges of providing state-wide and interstate services in relation to a complex area of federal jurisdiction
- the extent to which specialist social security legal services assist other legal assistance providers, including Legal Aid Commissions and generalist community legal centres, to respond to social security matters.¹⁵

Again, like many community legal services, some specialist social security legal services, supplement NLAP income with other government, non-government, and philanthropic funding. This funding tends to be one-off, time limited, and tied to a specific purpose. Recent examples include additional Commonwealth funding delivered to community legal services to meet increased demand due to the COVID-19 pandemic and the impacts of disasters in NSW and Queensland.

While welcome, piecemeal investments in response to crises do little to enable centres to design and deliver sustainable services that meet ongoing demand for legal assistance in their communities. Without adequate, regular funding, centres struggle to plan and deliver services that can consistently meet demand, attract, and retain staff with the requisite expertise, and keep staff in whom they've invested the time and resources necessary to develop social security expertise.

¹⁴ According to the Administrative Appeals Tribunal's [Whole of Tribunal Caseload Report for 2022 – 23](#) there were 6703 lodgements to the Tribunal's Social Security and Child Support Division in the period 1 July 2022 to 31 December 2022, compared with 2240 to the Division dealing with NDIS decision appeals.

¹⁵ Economic Justice Australia's 2023 – 24 Pre-Budget Submission (not yet published), notes that Legal Aid Commissions and generalist community legal centres refer many clients to specialist social security legal services. For example, Legal Aid Commissions refer people who don't meet strict means tests or who live in jurisdictions where they don't provide social security services like WA. Generalist community legal centres often refer on complex matters that exceed their expertise or capacity.

Robodebt created additional demand for services with no extra funding

Within the first few months of decisions being issued, specialist social security legal services across Australia noted an increase in demand for advice and assistance. For example, Welfare Rights Centre NSW experienced a 14% increase in demand for assistance with Centrelink debts between 2015 – 2016 and 2016 – 17, when the Robodebt Scheme commenced.¹⁶ Data provided to the Royal Commission by the Welfare Rights and Advocacy Service WA shows that in 2016-17, the centre assisted 49 people with a Robodebt matter, whilst also assisting more people with general Centrelink debt matters than in the previous year.¹⁷

However, specialist social security legal assistance services were already at capacity when Centrelink began to issue Robodebt notifications in late 2016. Because services received no additional funding to assist people to understand and query Robodebts – and in fact, in many jurisdictions were facing (or had recently received) significant funding cuts from federal and state governments¹⁸ – they were forced to deprioritise, and reallocate resources from, other areas and their capacity to offer representation was further diminished.¹⁹

Services also noted a marked increase in the complexity and time-intensive nature of the work required to help people understand if the debt they had been issued was a ‘Robodebt’, and to gather the evidence they needed to determine if it had been correctly calculated. This complexity was exacerbated by fundamental failures in the roll-out of the Robodebt Scheme, particularly:

- Inadequate explanations of how debts had been calculated and raised in Centrelink debt notices and on MyGov
- Limited knowledge of frontline Centrelink staff about how the scheme operated, where and how people could get further information about their debts, and their rights to have a decision reviewed
- Failures by Centrelink and Services Australia to:
 - Provide people with information about their debts, which resulted in social security legal services advising clients to request the information under freedom of information laws, or doing so on their behalf
 - Instigate reviews by Authorised Review Officers, even where people made multiple requests
 - Behave as model litigants as Respondents to appeals in the Administrative Appeals Tribunal
- The length and complexity of information obtained under freedom of information requests, which generally required a high level of expertise in social security law and policy to understand.²⁰

¹⁶ Statement of Katherine Boyle, Welfare Rights Centre Witness Statement, at [23].

¹⁷ Statement of Catherine Eagle, Welfare Rights and Advocacy Service Witness Statement, Attachment 1.

¹⁸ For example, in 2013-14, the NSW Government suddenly cancelled an ongoing funding grant that made up 40% its total funding and, in 2017, Welfare Rights and Advocacy Service WA lost 32% of its funding from the Federal government. In late 2016 and early 2017, the entire community legal sector faced a cut of \$35 million in federal funding, a threat the Federal Government backed down on ahead of the May 2017 Budget but that caused significant uncertainty for the sector nonetheless. See for example this [Guardian Australia article](#) from April 2017.

¹⁹ Statement of Catherine Eagle, Welfare Rights and Advocacy Service, at [22].

²⁰ Statement of Genevieve Bolton, Economic Justice Australia, at [81].

Urgent funding increase needed to address unmet demand

In its 2023 – 24 Pre-Budget Submission (not yet published), Economic Justice Australia calls for an immediate injection of \$3.63 million for its members and associate members. This would enable each to employ one full-time equivalent staff member to deliver specialist social security legal services. The submission notes that this amount is not sufficient to meet demand for assistance from social security recipients. Rather it represents an interim measure while Economic Justice Australia works with its members, Community Legal Centres Australia, and the Federal Attorney General's Department to develop a longer-term funding proposal for the community legal sector as part of the independent review of the 2020 – 2025 NLAP. In fact, a much greater investment will be needed over the long-term to enable community legal centres to meet demand for social security and other civil and family law services.

Currently responsibility for funding social security legal assistance services largely falls to the Federal Attorney General's Department. While social security legal services are entirely funded through NLAP, Economic Justice Australia receives grant funding from the Department of Social Services to deliver research projects and provide expert advice on issues affecting the social security system as they arise. It's current funding grant is for the period 2021 – 2024.

This arrangement fails to recognise that the Department of Social Services is a major beneficiary of the specialist social security legal services community legal centres provide. In our view, there is a strong argument in favour of the Department of Social Services contributing a greater proportion of funding to specialist social security legal services. This could include:

- Providing an annual funding allocation to the Federal Attorney-General's Department to support community legal centres funded under NLAP to deliver social security legal assistance services
- Directly funding community legal centres and other legal assistance providers to:
 - establish or expand existing specialist social security legal services
 - broaden the range of service they offer (for example by assisting people to understand and apply for social security payments, as well as to challenge adverse decisions and debts)
 - increase their capacity to undertake law reform and policy work.

This could include targeted funding for services in rural, regional, remote, and very remote communities (for example through the Remote Jobs and Communities Program)

- Delivering adequate and secure funding to Economic Justice Australia. Funding a strong peak body represents an investment in the whole sector and would allow Economic Justice Australia to:
 - provide the full suite of services its members expect and need to deliver high quality services to the community
 - increase the output of its advice and advocacy to government to improve the fairness of our social security system and reduce poverty and disadvantage.

Transferring a greater share of responsibility for funding specialist social security legal services may also help to address the challenges that arise for services that deliver contracted services for one government department, while largely providing specialist advice to and advocacy to, and in relation to, another.

Recommendations

Recommendation 1

The Federal Government should:

- d) Significantly increase its investment in specialist social security legal services to enable them to meet demand for assistance from people experiencing disadvantage who have been impacted by adverse social security or family assistance decisions, particularly in rural, regional, remote, and very remote communities
- e) Work collaboratively with Economic Justice Australia and its members to ascertain the level of unmet need for social security legal services and the quantum of funding required to meet this need
- f) Provide increased, ongoing, funding to Economic Justice Australia, so that it can continue to provide expert social security advice to government and provide the full suite of capacity building and advocacy services its members expect from their national peak body.

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The bulk of this increase in funding for specialist social security legal services should come from the Department of Social Services and should ensure equitable access to social security legal services to people in rural, regional, remote, and very remote communities.

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The Attorney General's Department and Department of Social Services should work together to:

- c) Determine the most appropriate mechanism by which to share responsibility for funding community legal centres to deliver specialist social security legal services
- d) Minimise the duplication of administrative burdens and address the communication and other challenges that can arise for organisations required to report to multiple funding bodies.

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The Robodebt Royal Commission should adopt the substantive recommendations made by Economic Justice Australia and its members in relation to using automated systems to make decisions about people's social security entitlements and debts, in submissions, witness statements, and other evidence presented at public hearings.