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2. To what extent do you think the community is aware of and understands: a. the Act and how it works b. what change or suppression practices are and c. the harm caused by change or suppression practices

I believe a large minority of Australians, at least, are aware that the use of hormonal and surgical methods used to change gender often lead to long-term mental harm if performed on teenagers or anyone who has not reached full and independent adulthood. Thus, non-adults should be encouraged to wait until full adulthood for any such decisions.

4. How clear is the Act's definition of what is and what is not a change or suppression practice? If further clarity is needed, what forms of clarification would be most helpful?

The Act prioritizes one therapeutic approach over others, and is thus not neutral. It defaults to an affirmation-only approach, which may not be suitable or effective for those seeking support or therapy. A genuinely neutral law would not privilege one clinical approach over another, instead allowing for a range of therapeutic options to be available to those who need them.

5. How clear is the exclusion for health service providers? If further clarity is needed, how could this best be achieved?

The Act's provisions have the consequence of undermining the ability of practitioners with non-affirming clinical views to confidently engage in ordinary professional practice, even where such practice is evidence-based and conducted with informed consent, as the Act's language and examples create a chilling effect on clinical practice, such as the express example that psychotherapy is a prohibited suppression activity unless it falls within the exemption, and thus reasonable professional judgment must be allowed to include minority or dissenting clinical approaches given the contested evidence base.

6. Is greater clarity needed about how people of faith can hold and express their beliefs to support clear understanding and compliance with the Act? What forms of clarification would be most helpful?

The Act's broad definition of change or suppression practices could lead to unintended consequences, where a pastor or faith-based counsellor who responds to a person's request for guidance on living out their faith in accordance with their same-sex attraction may risk liability under the Act. Furthermore, the Act fails to account for the autonomy and agency of LGB individuals of faith who consensually seek support to reconcile their faith with their same-sex attraction, leaving them without access to the support they desire.

7. How effective are VEOHRC's awareness and education materials on change or suppression practices? What improvements, if any, could help strengthen community understanding and compliance?

The consultation document is more of an advocacy piece than a neutral description of the law, aiming to extend the Act's reach beyond its legislative requirements. These materials should be edited immediately if they are to be viewed as true education materials. Affirmation is definitely not

the sole medically appropriate option for gender identity, a position disputed by clinical evidence, including the Cass Review.

9. Are there changes that could help support VEOHRC to carry out its functions or improve the effectiveness of the civil response scheme? If so, please describe any changes.

The VEOHRC must edit its materials on change or suppression practices to remove the uncritical adoption of affirmation of gender identity as the only medically appropriate option. This approach could cause serious harm to adolescents who may be rushed into irreversible medical interventions without adequate consideration of long-term and potentially untreatable adverse mental health effects, or alternatives. Such materials should not be permitted to stand as authoritative guidance under the Change or Suppression (Conversion) Practices Prohibition Act 2021.

13. Should a civil cause of action be introduced under the Act? What distinct purpose would it serve compared to existing pathways?

The introduction of a private right of action through civil tribunals under the Act is a deeply concerning development that poses a significant threat to free speech. This provision creates a pervasive chilling effect on speech that goes far beyond any legitimate regulatory purpose, as individuals will be hesitant to express their opinions or engage in discussions for fear of being taken to a tribunal. Furthermore, the fact that civil claims can be brought by any individual who feels aggrieved, with a lower standard of proof and costs falling on the respondent regardless of outcome, exacerbates the problem, making this form of regulation particularly onerous and unworthy of Australian norms and ideals.