



**Australian Pork
Limited**

7 June 2024

Skilled Migration and International
Jobs and Skills Australia
Via email: CoreSkillsList@jobsandskills.gov.au

To whom it may concern,

Re: Draft Core Skills Occupations List (CSOL) for Consultation

Australian Pork Limited values the opportunity to provide input to consideration of the draft CSOL, outlined in the sections that follow.

APL is the peak representative body for Australian pork producers. It is a producer-owned company combining marketing, export development, research and innovation and strategic policy development to assist in securing a profitable and sustainable future for the Australian pork industry.

APL holds a number of roles on behalf of the industry:

- The pork Research, Development and Extension organisation leading research in partnership with the Australian government and research community,
- The marketing arm of the pork industry managing national campaigns to raise awareness of high-quality Australian pork and smallgoods
- The peak body for the Australian pork industry, representing pork within the National Farmers' Federation (NFF) and other representative frameworks,
- Leading the pork industry's Sustainability Framework and part of the sector-wide collaborative effort to develop an Australian Agricultural Sustainability Framework, coordinated by the NFF on behalf of the Federal Department of Agriculture, and
- The industry signatory to the Emergency Animal Disease Response Deed (EADRA).

The domestic pork industry is a vital part of Australia's food supply chain, with pork the second most consumed meat in Australia and all fresh pork consumed in Australia domestically sourced.

Australian pork is a low emissions protein. Further, a recent industry-first study¹ demonstrated that the quality and efficiency of Australia's pork supply chains can generate three times the human-edible protein it consumes.

¹ <https://www.publish.csiro.au/AN/pdf/AN23057>

The Australian pork industry contributes around \$6 billion in gross domestic product to the economy. The industry is domestically focused with around 90% of our production providing high quality protein for Australians. The value of the 10% exported in 2022/23 was \$182 million. In 2022/23, the industry produced 453,426 metric tonnes of pork.

Thank you for the opportunity to provide comment on the draft CSOL, our detailed submission is included below. We would be happy to provide further information to support our submission if needed. Please contact [REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

About the Australian pork industry

Our industry is national, with producers raising pigs at 6,314 sites across Australia (at 1 July 2023). The commercial sow herd is predominantly located in regional areas of Queensland, Victoria, SA, WA and NSW.

Approximately 34,600 full time equivalent jobs are supported by the industry nationally, predominantly in regional Australia, underpinning economic and social prosperity of communities and the wellbeing of individuals. The industry's workforce is skilled, specialised and generally engaged on a permanent basis.

The Australian pork Sustainability Framework's People Pillar reflects the industry's ongoing commitment to raise pigs and produce pork - a nutritious, affordable protein - in ways that support our industry's people and our local communities.

Like many rural industries, the pork industry is currently being impacted by staff shortages with the industry willing and able to support more than 36,000 jobs nationwide and opportunity for growth up to 40,000 as Australian pork replaces imported pork in the domestic production of smallgoods.

The challenge of labour and skills shortages is a long-standing business constraint in the industry. It exists despite proactive, ongoing efforts to deliver education and outreach, attraction and retention initiatives, staff development and persistent recruitment efforts.

As outlined in the APL submission to the Employment White Paper (December 2022), for our industry to realise its full growth potential our industry must be supported by effective employment programs, a responsive migration system, and regional development policies and investment that ensure our regions are attractive places to live and work. Increased workforce will power regional businesses, economies, and communities, build food security and future proof Australian agriculture and the regions.

Labour and skill requirements in pig production

From the initial planning and design of the farm through to the day-today management of staff, pig production requires a highly skilled team. Pigs are high-care animals requiring specialist animal husbandry skills. At the very least, all stockpersons working with pigs must be suitably qualified to ensure compliance with the range of state animal welfare legislation in place across Australia.

The Australian pork industry prides itself on world leading animal care, environmental sustainability and biosecurity. Skilled staff are critical to maintaining these high standards. The Model Code of Practice for the Welfare of Animals: Pigs (3rd edition) (MCOP) sets the minimum standards of care required for the welfare of pigs, reflected nationally within legislative frameworks of jurisdictions. The Code requires that pigs be cared for by personnel who are skilled in pig husbandry and competent to maintain the health and welfare of the animals in accordance with the standards, or are under direct supervision of such personnel.

Further, to protect our industry from the impact of animal disease, the entire Australian pork supply chain maintains robust hygiene and biosecurity practices. Currently, 91% of sows and their progeny are on farms registered with the Australian Pork Industry Quality Assurance Scheme APIQ✓®. Through its compulsory annual audits and industry-focused approach APIQ certification provides customers with assurance that high standards are in place. The program includes a range of core modules with required standards and performance indicators setting the expectations around management, animal welfare, biosecurity, food safety and environmental outcomes.

Labour shortages can pose a risk to standards upheld through the supply chain including people wellbeing and safety, animal care and biosecurity. Severe shortages were experienced during and post COVID and reestablishing capability and resilience is ongoing.

The pork industry relies on business continuity through the supply chain. The regular of stock is essential to ensure stocking densities are complied with and pigs do not suffer negative animal welfare impacts. Any restriction on processing capacity, or a reduction in transporting or processing of pigs, including across state borders, has potential to disrupt the supply chain and impact on businesses and a significant impact on animal welfare.

Improvements in pig welfare will continue to (increasingly) require a strong focus on trained and skilled personnel and management to uphold people safety and animal welfare needs.

Access to skilled migration has been and continues to be very important to the Australian pork industry.

Characteristics of the Australian pig farming workforce includes:

- 36% of employees were born overseas, compared to 20% for the rest of agriculture.
- Top 5 most common countries: Philippines (22% of all employees), England (3%), NZ, South Africa and Netherlands then a mix of others.

There is significant skills and capability overseas that Australia benefits from. Pork is important culturally and for food security on other parts of the world, where local industry, agricultural training and university and research institutions have skills and capability that can (and do) supplement the shortfalls in Australia.

Specific comments on the draft CSOL 'for consultation' list

There are a number occupations currently listed which are vital to the industry.

APL strongly support the inclusion of veterinarian on the 'confident on list', along with trade roles: fitter, welder, fitter and turner, diesel motor mechanic which are in shortage in regional areas, and important to the pork industry including as part of low emissions technology uptake eg for biogas systems.

The following occupations – and the ability to continue to access skilled visa holders in these occupations where there are shortages in the domestic market - are essential to the viability

and future sustainability of the Australian pork industry, its businesses and the people and communities it supports.

APL recommendation:

The following occupations must be included in future occupation lists underpinning skilled migration given industry need and local shortages, which continue to be proven by labour market testing. The industry, nationally, has maintained ongoing, consistent labour market testing over time for these occupations:

- Pig Farmer (ANZSCO 121318): for skilled management roles
- Senior Stockperson (Piggery) (ANZSCO 363214): an occupation in shortage nationally and vital to maintaining high standards of animal care and business operations, and to support and supervise lesser skilled team members.
- Animal husbandry technician (311113)
- Mechanical Engineering Technician (312512)
- Electrical Engineering Technician (312311): this and the above supporting the implementation and use of automation, high technology infrastructure and low emissions technology such as biogas on farms
- Meat Inspector 311312: recognised as in shortage by the Australian government (who employ in meat processing plants)
- Primary Products Quality Assurance Officer (QA) 311314

In addition, the following lower skilled occupations remain in shortage and consideration of migration pathways is required to supplement persistent gaps in the Australian workforce:

- Pig farm worker ANZSCO 842315
- Truck driver ANZSCO 733111
- Meat Boner and Slicer 831211
- Slaughterer 831212
- Meat Process Worker 831311
- Meat Packer 832114
- Skilled Meat Worker (Meat Industry Labour Agreement)
- Stockfeed Mill operator (grain mill worker)

Opportunity for industry to provide clarity

If there are mixed signals or JSA has evidence on hand that has led to these occupations being on the 'for consultation list', we would value the opportunity to understand in more detail and provide further information if possible.

For example, a factor leading to mixed signals or data may relate to ANZSCO classifications. For a long time ANZSCO level 3 on farm roles were absent in ANZSCO, to the detriment of the sector. This has been addressed in recent years but may mean information regarding related ANZSCO level 1 and 3 occupations is mixed.

APL recommendation

Prior to finalising the advice on CSOL, please take the opportunity to check all assumptions with the industry.

APL does have concerns that without digging a little deeper into the use of these occupations in an industry, incorrect assumptions may confound the analysis.

For example, data made available to us from Department of Home Affairs highlights the ongoing use of Pig Farmer and Senior Stockperson Piggery (Pork Industry Labour Agreement) visa pathways by the industry. The information provided illustrated a broad salary range (e.g. up to six figure salaries) for people sponsored under the Pig Farmer occupation. This reinforces the use of this visa pathway to provide farms with staff to fill management roles and the need to ensure this remains a pathway for higher, skilled management roles.

Reasons underpinning our comments

Regarding trade roles

Trade and maintenance roles listed above are in shortage in regional areas and in strong competition. Regional job vacancies are at record highs², particularly within technician and trade roles in regional areas³. The industry faces strong competition from other sectors eg resources and energy sector (for labourer and trade roles such as mechanics, diesel mechanics, engineering technicians, electricians), and with the service and care sectors in regional areas.

For example, as part of the industry's move to improved sustainability and adoption of emissions reduction farming systems, a number of producers adopted biogas systems on farm. It was estimated that about 16% of producers had biogas systems in place in 2021 and APL has a target to achieve 60% of production utilising waste recycling and renewable energy technology. These systems require specialised labour for installation or maintenance. They involve daily checks and some components require skilled diesel mechanics and other tradespeople. Specialist labour to fix breakdowns and provide ongoing troubleshooting and maintenance is extremely difficult to find and it is not uncommon for service mechanics to have to travel excessive distances to sites (e.g. 1000km round trip) in regional areas.

² <https://regionalaustralia.org.au/Web/Web/Toolkits-Indexes/Regional-Jobs-Update/Regional-Jobs-Updates.aspx>

³ <https://www.jobsandskills.gov.au/news/2023-skills-priority-list-released-0>; the occupation of Senior Stockperson Piggery aligning with this category.

Labour market testing

Results from labour market testing a number of these occupations frequently yield few, if any, suitable Australian candidates. The Australian pork industry is a national industry and candidates for these roles will move freely to pursue job opportunities, including interstate. Within the industry is also not uncommon for temporary skilled visa holders to transfer employers (in the same occupation staying within the industry) driven by various lifestyle and career opportunities on offer among industry employers. With the employer covering the nomination transfer costs.

Skilled migrants in the industry

The employment and career path of employer-sponsored visa holders within the industry aligns with their experience and qualifications. These staff are recognised as critical to our industry. Visa holders are highly valued by their employers and supported (along with their spouses and families) in many ways by their sponsors. For example, through career development opportunities, community involvement, housing, accommodation and settlement. Some examples include:

- Applications to and involvement of migrants in APL industry leadership programs (Pork Leadership Course and Australian Pork Emerging Leaders), industry training and extension events.
- The practice in industry of commencing new starters including visa holders (skilled and WHM) on accredited training such as the Pork Industry Stockperson Skillset and Certificate III Pork Production.
- Recognition of skills and career development, enabling further skills transfer. An example of a migrant undertaking further training to become a formal trainer and assessor in order to teach other stockpeople via accredited training.

We frequently hear of examples of visa holders still employed within the industry 12, 14, up to 20 years tenure and to retirement age. Now with families settled and working and studying in Australia in fields such as nursing and aged care.

In a deep dive survey undertaken by APL in 2017 regarding migration (and reinforced on a regular basis through less formal surveying and discussion with industry):

- 90% of respondents noted the positive impact on business productivity as a result of accessing the previous 457 visa program.
- Also noted by 82% of respondents were improvements in staff retention overall. Benefits of skilled migration including via temporary and permanent visas is outlined in more detail, along with producer quotes, in our submission to the National

Agricultural Workforce Strategy (2020) and the Migration, Pathway to Nation Building inquiry⁴.

- *"Having these (temporary skilled shortage) workers in our business has done many things for us; helped us have a stable workforce, turnover of staff is minimal even with the Australians, improved work culture, allowed us to grow our business, work cover claims are down."* – QLD producer
- *"Their presence has helped the Australian guys to show leadership, openness to another culture for a better, diverse workplace"* – Victorian producer

The industry's use of the migration system is small but crucial in terms of the significant flow-on benefits to businesses and regional communities. It underpins business stability, growth and innovation potential, helping ensure individual employers and the industry can pursue further improvements and value-adding.

Evidence that has informed our response

Our responses are based on a range of different sources including:

- APL-run workforce surveys.
- Feedback from industry meetings and strategic planning. This includes:
 - APL Extension Roadshow 2023 (attendees represented 64% of national production [commercial sow herd])
 - APL Delegates meetings. Delegates cover 60% of production in the industry. They also represent constituents (other pig-producing businesses) which extends their coverage to 83.5% of production.
 - A strategic environmental scanning process, involving industry representatives which has documented the challenges, opportunities, and goals for the Australian pork industry across the entire value chain.
- Ongoing direct producer/business feedback as well as ongoing feedback from other stakeholders (state pork organisations, service providers such as migration agents and training (RTO) organisations that service the industry, the research community).
- An understanding of recruitment activity and use of visas in the industry (shared by Department of Home Affairs).
- Relevant research including that commissioned by APL.

APL also extended information about the CSOL consultation through our stakeholder communication channels, to facilitate individual responses to the survey.

Much of our member/levy payer feedback relates to skills shortages experienced by producers (i.e the on-farm part of the pork supply chain).

⁴ <https://www.aph.gov.au/DocumentStore.ashx?id=6d6681f7-a99f-4e9e-a87b-462b076dc820&subId=736161>

A summary of industry labour and skills needs evidence

Feedback is mainly sourced from employers located in regional QLD, Vic, SA, WA and NSW.

1) Industry strategic planning 2023 – key insights

- Labour was identified as the most pressing need for the industry, with challenges across the entire value chain by lack of skilled labour, particularly middle to senior management roles. This issue extends to the industry’s research community. It includes:
 - Lack of skilled employees who want to work in the industry. Accessing skilled labour and piggery management expertise is a challenge, and there is a continued requirement for applied R&D staff and higher research capacity.
 - A looming inter-generational gap and loss of technical expertise and know-how.
 - The need for R&D and education/training to better align with the skills needs of the pork industry.

2) APL Roadshow – producer workforce shortage poll:

Workshop events were conducted during September – October 2023 in Bendigo (Vic), Toowoomba and Murgon (Qld), Gunnedah (NSW), Perth (WA), and Murray Bridge (SA) and Young (NSW).

Industry producer participants represented 64% of industry production nationally with workforce poll respondents a subset of this.

The results showed:

- 60% of respondents reported having current vacancies
- Participants were asked about staff numbers at full capacity and current vacancies. Percentage shortfall of staff across total respondents was on average 8% but ranged from 0 to 29%.
- Occupations reported as most difficult to fill (in order of most frequently mentioned) were:
 - Skilled pig stockpeople (ANZSCO 363214)
 - Truck driver (ANZSCO 733111)
 - Maintenance (ANZSCO 312512 and labourers)
 - Trade roles including mechanic, welder (ANZSCO 321212, 321111, 321211, 341111, 322313)
 - Piggery attendant (Pig farm worker ANZSCO 842315, 311113)
 - Manager capability (Pig Farmer ANZSCO 121318)

This latest poll provided updated insights, following industry consultation in 2022 and 2020:

- A 2022 APL survey of pork producers⁵, 60% of respondents reported having a shortfall of staff. Of this 60%, around three quarters reported a 10-20% shortfall and the remaining quarter 30% or greater. Constraints are typically worse in processing; an Australian Meat Industry Council 2022 survey (not pork processing-specific) reported 65% of respondents operating at between 50-80% capacity.
- Consultation to support the development of the 2020-21 APL Workforce Strategy (Workforce Strategy) resulted in 74% of respondents indicating that labour and skill gaps were their main workforce issues. Engagement also highlighted that despite significant efforts, they struggle to find enough local people to employ, particularly with the appropriate interest, attitude and skills.

3) Queensland Pig Consultancy Group Industry Day – participant survey:

- 17 November 2023, with over 100 attendees involved in producing pork in QLD.
- Survey respondents (n = 71) rated 'attraction and retention of labour' the second highest challenge they are facing now and into the future.

4) Relevant research

- Based on economic impact analysis by Acil Allen 2024, it is estimated that the Australian pork industry's directly employs 10,041 people in Australia, comprising:
 - i. Pig Production (3,415 jobs)
 - ii. Primary Processing (3,200 jobs)
 - iii. Secondary Processing and Wholesaling (3,425 jobs)

As Australian pork replaces imported pork in the domestic production of smallgoods, the industry is able to support more jobs. If domestic producers were to supply the entire domestic demand, the upper bound estimate of total full time equivalent employment throughout the pork industry supply chain, including flow-on effects, would increase by 20%.

Source: ACIL Allen (2024), 2022-23 Economic Contribution of the Australian Pork Industry, Prepared for APL. Jan 2024

5) Low graduate supply

Labour supply deficits have primarily been caused by poor social perceptions of the industry, which unfortunately exist within primary, secondary, and tertiary students. There are also relatively low numbers of animal science graduates in Australia, and fewer young people entering farming (National Agricultural Workforce Strategy 2020).

⁵ n=74, representing 44% of production; July to September 2022

There have also been consistently more jobs available in agriculture than there have been suitable candidates. In 2022, there were six jobs to every agriculture graduate.

Considering supply of agricultural university graduates in Australia versus job demand for graduates shows the demand for graduates is at least 3000 per year. The number of suitably educated graduates however has been fewer than 900 per year, that is, a shortfall of over 2000 per year⁶.

University graduate and job advertisement data shows there are relatively low numbers of animal science university graduates (around 100 completions annually) in Australia, for available jobs (with over **four times** the number of jobs to graduates in 2021) (Pratley 2022) – Figure 1 and 2 below.

In addition, use of Certificate III Pork Production and Stockperson Skillsets remains very important and enrolments and completions have been increasing over time. However, our understanding of their use, and analysis of NCVER data, indicates a smaller portion of learners are school-based rather than in the workplace. Increasing new entrants via vocational education and training pathways is a priority however, with industry already supporting and exploring new ways to create local opportunities for school students into these pathways.

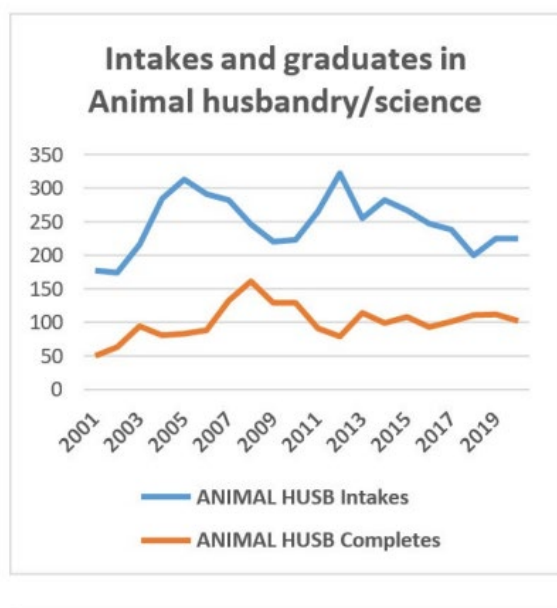


Figure 1: Higher education data regarding animal husbandry/science intakes/graduates. Source: Pratley J (2022) 'The workforce challenge in agribusiness in Australia' Report to Agribusiness Australia

⁶ Pratley 2022 <https://www.agribusiness.asn.au/documents/item/710>

APPENDIX B – JOB ADVERTISEMENTS



Figure 2: Job advertisements for livestock vacancies. Source: Pratley J (2022) 'The workforce challenge in agribusiness in Australia' Report to Agribusiness Australia