

28 May 2024

Professor Barney Glover AO
Commissioner, Jobs and Skill Australia
Department of Employment and Workplace Relations
GPO Box 9828
Canberra ACT 2600

Submitted online jobsandskills.gov.au

Dear Professor Glover

Draft Core Skills Occupations List (CSOL) for Consultation

I am writing regarding the publication of the draft Core Skills Occupations List (CSOL) and the request to provide feedback on this draft. We note our understanding that Jobs and Skills Australia will use the responses to the consultation to supplement labour market data and other intelligence to inform its advice to Government on the CSOL.

Cochlear welcomes the opportunity to provide feedback on the draft CSOL. As outlined below and detailed at **Attachment A, Cochlear respectfully requests 18 positions being moved to the “on” list for inclusion in the final CSOL.** Cochlear has recently used/intends to use these 18 positions as a key component of our overall talent strategy and successfully operating our Global business from Sydney headquarters.

As you may be aware, Cochlear is the global leader in implantable hearing solutions. Since 1981, Cochlear has provided more than 750,000 implantable devices, helping recipients of all ages, hear and live full and active lives. Cochlear has a significant international footprint, with our products available in over 180 countries, direct operations in more than 35 countries, and a global workforce of over 5,000 people.

While Cochlear is a global company, we have a proudly Australian heritage. Cochlear currently employs around 2,200 people in Australia. Cochlear’s global headquarters are at Macquarie University (MQU) in Sydney and in Australia we have manufacturing facilities at MQU, Lane Cove (Sydney), and Brisbane. Our global headquarters in Australia includes core management, R&D, and advanced manufacturing capabilities. Cochlear has a strong record of training and developing employees in Australia, including through our intern and graduate programs as well as promoting and supporting the Australian life sciences ecosystem.

As I outlined in my letter of 3 November 2022, to the Hon. Andrew Giles MP regarding the comprehensive review of Australia’s migration system, skilled migration and attracting global talent have been critical to building Cochlear’s global success and competitiveness. As the only local manufacturer of implantable hearing technology, with highly specific and unique talent requirements, Cochlear relies on the creation of its own global talent ‘eco-system’ to develop and sustain a stable and suitably qualified workforce. It is a high-cost endeavour for Cochlear to recruit foreign nationals and they do not replace our recruitment or training of Australians. However, for some positions, over time, it has been essential to acquire talent from the international labour market due to the scarcity of the specific skills required within the domestic market.

For context, only around 2% of our Australian workforce are employees on some form of temporary visa. Further, with the introduction of the new Specialist Skills Pathway, our reliance on positions referencing occupation lists via the Core Skills Pathway will be decreased. I note that we also have a significant number of staff who are foreign nationals/skilled migrants who have since become permanent residents of citizens.

While our reliance on temporary skilled visa holders is low, these individuals across both the Specialist and Core Skills Pathways are critical for Cochlear's Australian operations to:

- meet skills gaps we cannot recruit locally because of our unique industry and operating activities or where there is a national/international skills shortage (for example software engineering)
- supplement the skills and experience of Australian based staff with leading-edge scientific expertise from internationally recognised researchers
- train and transfer internationally acquired skills and knowledge to the local workforce, and
- provide professional development opportunities within the company for overseas based employees which contribute to Cochlear's global skills base and success.

Despite our ongoing efforts to develop skills locally, acquiring critical skills from the global labour market to augment the local talent pool will be necessary for the foreseeable future in order to maintain Cochlear's global competitiveness (and that of the Australian med tech sector more broadly). Given this context, Cochlear respectfully requests 18 positions being moved to the "on" list for inclusion in the final CSOL (see [Attachment A](#)).

Cochlear would be pleased to discuss our views. For further information, please contact [REDACTED]

I have provided a copy of this submission to the Hon Brendan O'Connor MP, the Hon Clare O'Neil MP and the Hon Andrew Giles MP.

Yours sincerely

COCHLEAR LIMITED

[REDACTED]

[REDACTED]

Attachment A

Cochlear requests that these 18 positions be moved to the “on” list for inclusion in the final CSOL.

Draft ‘Off’ List

- 135112 ICT Project Manager
- 139999 Specialist Managers nec

Draft ‘Consultation’ List

- 133512 Production Manager (Manufacturing)
- 139916 Quality Assurance Manager
- 139917 Regulatory Affairs Manager
- 224713 Management Consultant
- 225113 Marketing Specialist
- 225499 Technical Sales Representatives
- 233411 Electronics Engineer
- 233512 Mechanical Engineer
- 233513 Production or Plant Engineer
- 233913 Biomedical Engineer
- 261111 ICT Business Analyst
- 261112 Systems Analyst
- 261313 Software Engineer
- 263111 Computer Network and Systems Engineer
- 263213 ICT Systems Test Engineer
- 511112 Program or Project Administrator

