



Law Council
OF AUSTRALIA

Draft Core Skills Occupation List (CSOL)

Jobs and Skills Australia

4 June 2024



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About the Law Council of Australia

The Law Council of Australia represents the legal profession at the national level; speaks on behalf of its Constituent Bodies on federal, national, and international issues; promotes and defends the rule of law; and promotes the administration of justice, access to justice and general improvement of the law.

The Law Council advises governments, courts, and federal agencies on ways in which the law and the justice system can be improved for the benefit of the community. The Law Council also represents the Australian legal profession overseas, and maintains close relationships with legal professional bodies throughout the world. The Law Council was established in 1933, and represents its Constituent Bodies: 16 Australian State and Territory law societies and bar associations, and Law Firms Australia. The Law Council's Constituent Bodies are:

- Australian Capital Territory Bar Association
- Law Society of the Australian Capital Territory
- New South Wales Bar Association
- Law Society of New South Wales
- Northern Territory Bar Association
- Law Society Northern Territory
- Bar Association of Queensland
- Queensland Law Society
- South Australian Bar Association
- Law Society of South Australia
- Tasmanian Bar
- Law Society of Tasmania
- The Victorian Bar Incorporated
- Law Institute of Victoria
- Western Australian Bar Association
- Law Society of Western Australia
- Law Firms Australia

Through this representation, the Law Council acts on behalf of more than 104,000 Australian lawyers.

The Law Council is governed by a Board of 23 Directors: one from each of the Constituent Bodies, and six elected Executive members. The Directors meet quarterly to set objectives, policy, and priorities for the Law Council. Between Directors' meetings, responsibility for the policies and governance of the Law Council is exercised by the Executive members, led by the President who normally serves a one-year term. The Board of Directors elects the Executive members.

The members of the Law Council Executive for 2024 are:

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The Law Council's website is www.lawcouncil.au.

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Executive summary

1. The Law Council is grateful for the opportunity to make a submission to Jobs and Skills Australia (JSA) on the March 2024 draft Core Skills Occupation List (CSOL).¹
2. Giving all temporary skilled migrants a pathway to permanent residency and consolidating the skilled occupations lists into a single list are both aligned with previous Law Council recommendations.² However, the Law Council sees opportunities for the CSOL to address skills shortages in Australia more effectively, through a more flexible underlying framework.
3. Removing occupations from such an important list needs to be achieved with caution. For example, there may be occupations that are less utilised, but that individually are filling positions crucial to the economy, or to business/government enterprises, or filling a role regionally that cannot otherwise be filled. The presence of such occupations on the list acts as a safeguard against skills shortages. It is still for businesses and government organisations to apply and justify that each position is a genuine one.
4. Further, no occupation should be removed based on Department of Home Affairs (DHA) feedback on the difficulty of assessing the genuineness of occupations. Examples of this include *Motor Mechanics (General)* or *Customer Service Managers*, for which the thresholds are much higher, and there has been a tendency to reject applications based on assumptions made about the size and scope of businesses without considering whether or not there are genuine skills shortages.
5. To best achieve flexibility, the Law Council recommends abolishing a skilled occupation list in favour of skill level classification.
6. If, however, the CSOL is retained, the Law Council has identified key occupations that have been excluded from the 'Confident On' Draft List published by JSA,³ notably across the following key sectors:
 - (a) Information and communication technology;
 - (b) Healthcare and aged care;
 - (c) Engineering;
 - (d) Hospitality;
 - (e) Childcare and teaching;
 - (f) Science;
 - (g) Counselling and welfare;
 - (h) Professional services; and
 - (i) Transport.

¹ JSA, *Draft Core Skills Occupations List (CSOL) for Consultation*:

<<https://www.jobsandskills.gov.au/topics/migration-strategy/draft-core-skills-occupations-list-csol-consultation>>.

² Law Council, Submission to the Joint Standing Committee on Migration, *Migration, Pathway to Nation Building* (31 March 2023): <<https://lawcouncil.au/resources/submissions/migration-pathway-to-nation-building>>, [61]-[67]; Law Council, Submission to the Joint Standing Committee on Migration, *Australia's 2022-23 Migration Program* (10 December 2021): <<https://lawcouncil.au/resources/submissions/australias-2022-23-migration-program>>, [64].

³ JSA, *Confident On List*: <<https://www.jobsandskills.gov.au/topics/migration-strategy/draft-core-skills-occupations-list-csol-consultation/draft-csol-confident-on-list>>.

7. Drawing upon insights from practitioners and employers across these sectors, the Law Council recommends expanding the Confident On List to include important occupations experiencing skills shortages in Australia, such as the above list. This would fulfil the policy objective of the government as expressed in the *Migration Strategy* to “bring in the skilled employees Australia needs now and in the future to ensure that we are able to provide ourselves with the goods and services we need to support our way of life”.⁴

⁴ Australian Government, *Migration Strategy* (December 2023): <<https://immi.homeaffairs.gov.au/what-we-do/migration-strategy>>, 50.

Introduction

8. The new Skills in Demand visa will address some of the concerns that have been expressed by the Law Council and other peak bodies, including CEDA and the Grattan Institute, in past submissions and publications. For example, in the Law Council's submission to the Joint Standing Committee on Migration's inquiry *Migration, Pathway to Nation Building*, published on 31 March 2023, the importance of clear and certain pathways to permanent residency for temporary skilled migrants was emphasised:

*The availability of clear pathways to permanent residence assists greatly in attracting and retaining migrants with appropriate skills, experience and training, for whom Australia competes with other similar nations. It is also important for Australia's future capacity as it is a way to take advantage of the experiences that these workers have acquired in Australia, and it will help to stymie the cycle of shortages of workers with appropriate skills, experience and training that sometimes occur.*⁵

9. Accordingly, the Skills in Demand visa provides a much-needed guaranteed pathway to permanent residency.
10. Past submissions have criticised the skilled occupation lists, specifically their lack of flexibility leading to a failure 'to capture areas of genuine shortage in real time'.⁶ Consolidating multiple skilled occupation lists into one occupation list, undertaken by an independent body like JSA, is aligned with the Law Council's past recommendations.⁷
11. However, the Law Council considers that the continued reliance on occupations in the Australian and New Zealand Standard Classification of Occupations (**ANZSCO**) perpetuates the inflexibility of the list.⁸
12. Furthermore, the draft CSOL for consultation, published by JSA in March 2024, excludes some key occupations across a number of sectors. To prepare this submission, practising immigration lawyers contributing to this submission have gathered insights from employers who will be affected by the CSOL. These insights shape the concerns and recommendations around the draft CSOL detailed below.
13. Whilst the Specialist Skills stream of the Skills in Demand visa will create a pathway for some candidates in these excluded occupations where their annual earnings are at or above \$135,000, this will not be viable for some occupations, leaving a fundamental gap in the program.

A more flexible approach

14. The Law Council has previously recommended that ANZSCO be replaced with a system that is flexible and adaptable to rapidly changing labour needs. The ANZSCO occupation lists are developed using tracked data of skills shortages; however, the occupation lists come into effect after the fact. As a result, there are significant delays in recognising emerging, in-demand occupations or meeting Australian market opportunities as they arise quickly.

⁵ Law Council, Submission to the Joint Standing Committee on Migration, *Migration, Pathway to Nation Building* (31 March 2023) [24].

⁶ Ibid, [56].

⁷ Ibid, [61].

⁸ Ibid, [58].

15. For example, 'Data Scientist, ANZSCO 224115', a particularly relevant occupation in a landscape of increasing cyber security risk, did not receive an ANZSCO classification until September 2019.
16. Furthermore, a shortage which may have occurred may no longer be relevant by the time the occupation list is updated, leading to a skills mismatch.
17. The Law Council acknowledges that the Australian Bureau of Statistics (**ABS**) has engaged in a review of ANZSCO to consider how the system could be improved, the outcomes of which will be published at the end of July 2024.⁹ However, the new draft CSOL relies on six-digit ANZSCO occupation codes, limiting itself to these static classifications.
18. CEDA recommended increasing the flexibility of the occupation list by utilising the four-digit occupational unit group ANZSCO codes instead of the six-digit occupation codes. The Law Council supports this as one way of structurally improving the CSOL, shifting the focus from specific occupations to skill sets.¹⁰

Abolition of an occupation list?

19. The Law Council questions whether it is necessary to have an occupation list at all. Our previous submissions have suggested abolishing occupation lists and making the employer-sponsored visa program available to any candidate who can obtain employer sponsorship across the ANZSCO skill levels 1–3.¹¹
20. This would have the effect of enabling employers to drive which occupations are included in the visa program based on their specific needs.
21. Presently, there are more ANZSCO occupations classified under skill levels 1–3 than those contained across the skilled occupations lists, therefore representing a more expansive source of skills upon which Australian employers could draw.
22. In light of the above recommendations to replace the ANZSCO system, new skills level classifications incorporating a more adaptable range of occupations could be created to ensure that employers can access the skills they need as soon as the need arises, in a rapidly changing labour market.

⁹ See ABS, *ANZSCO Comprehensive Review Consultation*: <<https://consult.abs.gov.au/standards-and-classifications/anzsco-comprehensive-review-round-1>>.

¹⁰ See CEDA, *A Good Match: Optimising Australia's Permanent Skilled Migration*: <<https://www.ceda.com.au/researchandpolicies/research/population/a-good-match-optimising-australia-s-permanent-skil>>.

¹¹ See eg Law Council, Submission to the Joint Standing Committee on Migration, *Migration, Pathway to Nation Building* (31 March 2023) from [55].

The draft Core Skills Occupation List (CSOL)

23. The following suggestions are informed by the insights of Law Council Section and Constituent Body members, based on their practical experience as legal practitioners working in the area of skilled migration. The relevant occupations on the 'Confident Off'¹² List (**Off List**) and the 'Targeted for Consultation'¹³ List (**Consultation List**) are discussed below by sector.

ICT occupations

24. Whilst there are a number of ICT occupations on the Confident On List, the following occupations have notably been excluded:

- 135112—ICT Project Manager (Off List);
- 263212—ICT Support Engineer (Off List);
- 313112—ICT Customer Support Officer (Off List); and
- 313199—ICT Support Technicians nec (Off List).
- 251313—Software Engineer (Targeted)
- 261111—ICT Business Analyst (Targeted)
- 263111—Computer Network and Systems Engineer (Targeted)
- 261112—Systems Analyst (Targeted)
- 261311—Analyst Programmer (Targeted)
- 261314—Software Tester (Targeted)
- 225213—ICT Sales Representative (Targeted)
- 225211—ICT Account Manager (Targeted)
- 263213—ICT Systems Test Engineer (Targeted)
- 263299—ICT Support and Test Engineers nec (Targeted)

25. The Law Council recognises that it may be the intention of the JSA that candidates within these occupations are sponsored under the Specialist Skills pathway, which is not limited to the CSOL but instead open to employees earning \$135,000 or more per annum. However, some employees in these occupations would not meet this salary requirement, rendering these skilled workers inaccessible for Australian employers.

Trade occupations

26. There are many trade occupations included on the Off List and Consultation List that do not fit the current economic circumstances, or Government polices about the need for more housing and large scale construction projects needing to be undertaken. Examples on these lists include: carpenters; bricklayers and plasterers; renderers and tilers. Further, a number of trades associated with motor vehicles appear to be listed on the Off list or Targeted for Consultation list. This is despite there being significant skill shortages in such occupations across Australia both in cities and regionally. As of 31 March 2024, motor mechanics were the fourth-highest occupation nominated for 482 Visas with diesel mechanics being sixth.¹⁴

¹² JSA, *Confident Off List*. <<https://www.jobsandskills.gov.au/topics/migration-strategy/draft-core-skills-occupations-list-csol-consultation/draft-csol-confident-off-list>>.

¹³ JSA, *CSOL Targeted for Consultation*: <<https://www.jobsandskills.gov.au/topics/migration-strategy/draft-core-skills-occupations-list-csol-consultation/draft-csol-targeted-consultation>>.

¹⁴ chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.homeaffairs.gov.au/research-and-stats/files/temp-res-skilled-report-31-mar-2024.pdf page 14

27. Other trade occupations listed are also in unique and specialised trades such as a locksmith or farrier, but essential.
28. There remain significant skill shortages in the area of trades, as reflected in JSA's research and statistics.¹⁵ Despite JSA's own research showing that there remain significant trade skills shortages, it's unclear as to why so many trades have been included on both the Off List and Target for Consultation list. If such feedback has come from unions, then it needs to be fairly balanced with feedback from employers and employer peak bodies representing such trades and industries to ensure the most accurate indicators are being used. The LCA acknowledges that opportunities for Australian citizens and permanent residents to learn trades is beneficial, but that such spending will not necessarily fill short-term gaps, large scale projects or fill skill shortages regionally.

Healthcare and aged care occupations

29. Two of Australia's most critical skills shortage sectors are healthcare and aged care.¹⁶
30. The Law Council recommends that the following healthcare occupations be shifted from the Off List to the Confident On List:
- 134299 Health and Welfare Services Managers nec (Off List);
 - 251311 Environmental Health Officer (Off List); and
 - 254311 Nurse Manager (Off List).
31. Nurse Managers often undertake similar tasks to Registered Nurses under ANZSCO group 2544, though they additionally supervise Registered Nurses and arguably are more highly skilled. Accordingly, it is logical for Nurse Managers to be included on the Confident On List along with Registered Nurses.
32. There is a critical need to address the aged care workforce shortages of personal carers, nursing assistance, and disability support workers. These correspond to the ANZSCO classifications of:
- 423313 Personal Care Assistant;
 - 423312 Nursing Support Worker; and
 - 423111 Aged or Disabled Carer.
33. These occupations are not included on the Confident On List, Off List or Consultation List, nor any current skilled occupation list. Employers can only access them through the Aged Care Industry Labour Agreement (**ACILA**), which came into effect in May 2023.
34. For an aged care provider to utilise the ACILA, they must first enter a Memorandum of Understanding (**MoU**) with a relevant industry union. Despite their great need for migrant workers, the majority of aged care providers have not made use of the ACILA. The overwhelming explanation is that the terms of the MoU are not acceptable to providers. For example, there has in practice been an unwillingness to limit the scope of the MoU to apply only to employees working in carer roles, so that a part-time

¹⁵ See eg JSA, *Skills Shortage Quarterly – March 2024*: <<https://www.jobsandskills.gov.au/publications/skills-shortage-quarterly-march-2024>>, 12.

¹⁶ See eg Department of Health and Aged Care, *A tripartite approach to address workforce shortages in aged care*: <<https://www.health.gov.au/ministers/the-hon-anika-wells-mp/media/a-tripartite-approach-to-address-workforce-shortages-in-aged-care>>.

gardener would be afforded the same benefits, which includes being offered full-time work.

35. The Law Council recommends that the relevant aged care occupations be added to the Confident On List.
36. Addressing aged care workforce shortages should be a priority, particularly given Australia's ageing population. Per the Government's 2023 Intergenerational Report, over the next 40 years, the number of 65-year-olds in Australia will double, the number of 85-year-olds will triple, and there will be a sixfold increase in centenarians.¹⁷ Against this landscape, it is concerning that many aged care providers have closed down or are closing down due to an inability to meet workforce needs.

Engineering occupations

37. Although many engineering occupations are included on the Confident On List, testifying to the significant need for migrant engineers in Australia, the following occupations have been excluded:

- 263311—Telecommunications Engineer (Off List)
- 233411—Electronics Engineer (Targeted)
- 233513—Production or Plant Engineer (Targeted)
- 233914—Engineering Technologist (Targeted)
- 312312—Electrical Engineering Technician (Targeted)

38. We consider that many workers in these occupations would earn over the \$135,000 threshold, but not all.

Hospitality and retail occupations

39. Australia is experiencing significant skill shortages across hospitality and retail and therefore it is important for the following occupations to be shifted to the Confident On List:

- 141111—Café or Restaurant Manager (Off List);
- 142111—Retail Manager (General) (Consultation List);
- 149311—Conference and Event Organiser (Off List);
- 149999—Hospitality, Retail and Service Managers nec (Consultation List);
- 351311—Chef (Consultation List); and
- 351411—Cook (Consultation List).

40. In practitioners' experience, there have been many applications for cooks, chefs and restaurant managers both regionally and in major cities. Further, if such occupations were to be removed, it would put wages pressure on businesses and force more businesses to close because they are unable to find employees to fill positions. Diversity in hospitality is also essential to deliver the various cuisines that Australia is known to offer. As of 31 March 2024, chefs were the most nominated occupation for 482 Visa applications and both restaurant managers and cooks were in the top 15.¹⁸

¹⁷ Treasury, 2023 Intergenerational Report (24 August 2023): <<https://treasury.gov.au/publication/2023-intergenerational-report>>14-15.

¹⁸ chrome-extension://efaidnbnmnnibpcajpcglclefindmkaj/https://www.homeaffairs.gov.au/research-and-stats/files/temp-res-skilled-report-31-mar-2024.pdf page 14

Childcare and teaching occupations

41. The below childcare and teaching occupation are excluded from the Confident On List:

- 134111—Child Care Centre Manager;
- 242112—University Tutor (Off List);
- 249311—Teacher of English to Speakers of Other Languages (Off List); and
- 421111—Child Care Worker (Targeted for Consultation List).

42. The childcare sector particularly is experiencing severe skills shortages across the country.¹⁹ It is unlikely that the Specialist Skills pathway will be able to remedy this shortage given that average annual salaries in the sector are far below the salary threshold of \$135,000. For example, the average annual salary for Child Care Centre Managers is \$77,688. There is minimal scope for employers to raise salaries due to binding awards or enterprise agreements setting out a salary range.

Science occupations

43. We consider that several science occupations have been unnecessarily excluded from the Confident On List, and there appears to be no reason as to why they are not listed. This is despite the fact that the global talent stream focuses on occupations that are future-focussed, which includes a range of sciences and STEM areas being a clear focus for occupation growth and a need for students to focus study in this area:

- 234511—Life Scientist (General) (Consultation List);
- 234514—Biotechnologist (Consultation List);
- 234599—Life Scientists nec (Consultation List);
- 234611—Medical Laboratory Scientist (Off List);
- 311213—Medical Laboratory Technician (Off List); and
- 311413—Life Science Technician (Off List).

Counselling and welfare occupations

44. The Law Council considers that these counselling and welfare occupations should be added to the Confident On List:

- 272199—Counsellors nec (Off List);
- 411711—Community Worker (Off List); and
- 134214—Welfare centre Manager (Off List).

45. There would appear to be little justification for removing these occupations from the CSOL, when a particular business or government service may require such a position to be filled, and such occupations are often reflected through skilled migration from nominations by state or territories.

¹⁹ See eg Minister for Education et al Media Release, *Boost to early childhood education and care workforce* (7 October 2023): <<https://ministers.education.gov.au/aly/boost-early-childhood-education-and-care-workforce>>.

Professional services occupations

46. The below occupations are not included on the Confident On List despite workforce shortages. Many of these occupations are practised by junior as well as senior career professionals, so it cannot be presumed that the \$135,000 salary threshold for the Specialist Skills pathway would be satisfied:

- 225112—Market Research Analyst (Consultation List);
- 225113—Marketing Specialist (Consultation List);
- 225115—Digital Marketing Analyst (Consultation List);
- 224311—Economist (Off List);
- 222199—Financial Brokers nec (Off List);
- 599112—Legal Executive (Off List); and
- 131114—Public Relations Manager (Off List).
- 224711—Management Consultant (Consultation)
- 221111—Accountant (General) (Consultation)
- 222112—Management Accountant (Consultation)
- 221213—External Auditor (Consultation)
- 221214—Internal Auditor (Consultation)
- 132311—Human Resource Manager (Consultation)
- 225113—Marketing Specialist (Consultation)

47. In addition, the Law Council observes that 271299—*Judicial and Other Legal Professionals* is not included in the Confident On list, whereas 271311—*Solicitor* is.²⁰ The Judicial and Other Legal Professionals category is important to many commercial law practices for two key reasons.

48. First, the Other Legal Professionals category is critical in respect of solicitors qualified to practise in a foreign jurisdiction who are seeking to practise law in Australia but are not admitted to the Australian legal profession and do not hold an Australian practising certificate.

49. To practise Australian law, a person must hold a current Australian practising certificate.²¹ Practising certificates can only be granted to a person admitted to the Australian legal profession, and to be admitted in a Uniform Law jurisdiction, a person must obtain a compliance certificate from a relevant admitting authority.²²

50. The critical step for a foreign-qualified lawyer in this process is the grant of a compliance certificate from a Board.²³ The following prerequisites apply to the issuance of a compliance certificate:²⁴

- the person has attained the academic qualifications specified under the Admission Rules (**the academic prerequisite**); and

²⁰ 271299 is on the Consultation list.

²¹ Legal Profession Uniform Law, ss 6 and 10. The Legal Profession Uniform Law (**the Uniform Law**) applies in New South Wales, Victoria and Western Australia, however there are provisions to the same effect in the Legal Profession Acts of the other Australian jurisdictions.

²² The Legal Profession Admission Board in New South Wales, the Victorian Legal Admissions Board, or the Legal Practice Board of Western Australia.

²³ Uniform Law, s 19.

²⁴ Uniform Law, s 17.

- the person has satisfactorily completed the practical legal training requirements specified in the Admission Rules for the purposes of this section (**PLT prerequisite**); or
- the person has been exempted from either or both the academic and PLT prerequisites on the basis that the person has sufficient legal skills or relevant experience so as to render the person eligible for admission; and
- in every case, the person is a fit and proper person to be admitted to the Australian legal profession.

51. While it is open to an admitting authority to provide exemptions to a foreign qualified lawyer for the academic prerequisite or the PLT prerequisite (or both), a common practice of admitting authorities is to direct foreign qualified lawyers to complete additional study through an Australian legal institution.²⁵ For instance, a foreign qualified lawyer may be directed to complete several “Priestley 11” subjects (such as Australian Constitutional Law, Administrative Law, Contract Law, and Equity and Trusts) in respect of the academic prerequisite.
52. Law practices will often employ foreign-qualified lawyers subject to such a direction whilst they complete the relevant additional study, in the expectation that they will then be granted admission to the Australian profession and an Australian practising certificate. During that time of study however, the other legal professional category must underpin those foreign-qualified lawyers’ working rights as they are unable to rely upon the Solicitor category without an Australian practising certificate.
53. Secondly, the Other Legal Professional category captures many important quasi-legal roles within practices. These may include roles within digital legal delivery, innovation, and risks and conflicts teams. Such roles do not involve the practice of law in a strict sense, and therefore do not require the person filling the role to be admitted to the Australian legal profession, but they often require, or greatly benefit from, being performed by a person with legal experience.
54. If the Other Legal Professional category were omitted from the final CSOL, it would greatly limit the ability of law practices to source and engage the best and most appropriately qualified candidates for such roles, especially in circumstances where the local availability or interest for such roles is scarce. This, in turn, would have a detrimental impact on services delivered to clients and employees at affected law practices.
55. To be clear, the Law Council still supports the retention of 271311—*Solicitor* on the CSOL, and submits that JSA should consider adapting this category to include foreign-qualified lawyers employed by an Australian legal practice who are completing directed study for local admission.

²⁵ It should be noted for completeness:

- that foreign qualified lawyers may also seek conditional admission, but conditional admission: is only available in Uniform Law jurisdictions of New South Wales, Victoria and Western Australia; is subject to a broad discretion exercised by admitting authorities, and; is not currently sought as often as full admission; and
- that the Legal Services Council has issued a new [Guideline](#) relating to Conditional Admission of foreign lawyers in Uniform Law jurisdictions. The Guidelines clarify that a foreign-qualified lawyer may be issued a compliance certificate recommending admission to the Australian legal profession in those Uniform Law jurisdictions subject to one or more conditions including, for example, practising Australian law under supervision, or undertaking particular academic or PLT training.

Sporting occupations

56. Practitioners specialising in this area observe that *452317 Other Sports Coach or Instructor (Wushu Martial Arts and Yoga Instructor Only)* is the only sports-related occupation on the Confident On list, which seems incongruous. The Law Council expects that Skills Australia will receive submissions from a range of peak sporting bodies and, if it does not do so, should consult with such bodies before removing any occupation from the list.
57. The Law Council recommends inclusion of the following in the CSOL:
- 139915—Sports Administrator (Off list);
 - 149113—Sports Centre Manager (Off list);
 - 452322—Sports Umpire (Off list);
 - 452323—Other Sports Official (Off list);
 - 452499—Sportspersons nec (Off list);
 - 362312—Sports Turf Manager (Consultation list);
 - 362313—Sports Turf Trades Worker (Consultation list);
 - 452313—Horse Riding Coach or Instructor (Consultation list); and
 - 452321—Sports Development Officer (Consultation list).

Transport occupations

58. The Law Council recommends that the following occupations should be included on the Confident On List, particularly those within the aviation sector given workforce shortages following the pandemic:
- 149413—Transport Company Manager (Off List);
 - 231111—Aeroplane Pilot (Consultation List);
 - 451711—Flight Attendant (Consultation List); and
 - 231299—Marine Transport Professionals nec (Off List).

Business or Corporate Manager Occupations

59. It is unclear to the Law Council why so many management positions have been put on either the Consult List or Off List.
60. We recommend that the occupations pertaining to managers should be retained where there cannot be a generic position, such as hotel or motel manager which has no generic ANZCO code, or where a management level position is removed yet there is no similar corresponding generic occupation at the same skill level or type.

Arts occupations

61. The Law Council assumes that the various peak arts and entertainment bodies (including, but also going beyond unions) will be consulted. If this has not been completed or planned, it should be undertaken to ensure that informed decisions about what to include on the consolidated CSOL can be made.

Other occupations

46. The Law Council has also received feedback that the following other occupations should be added to the Confidential List:

- 399411—Jeweller (Off List)
- 399514—Make Up Artist (Off List)
- 149212—Customer Service Manager (Off List)
- 232411—Graphic Designer (Off List)
- 224311—Economist (Off List)
- 211112—Dancer or Choreographer