



**MAPIEN**

To Whom It May Concern  
Jobs and Skills Australia  
Via electronic submission

30 May 2024

### **Submission in relation to draft Core Skills Occupations List (CSOL)**

This submission is provided in response to the current consultation on the draft Core Skills Occupation List (CSOL) which will be introduced alongside the new Skills in Demand Visa. We understand that the JSA has developed a Migration Labour Market Indicator Model to be used in conjunction with deep stakeholder engagement, both of which will be considered to inform JSA's advice to Government on the CSOL.

We understand JSA is still to release a more detailed Methodology Paper outlining how stakeholder feedback will be incorporated into its advice to the Australian Government and understand also that its model will analyse various labour market indicators and datasets, primarily produced by different Government departments.

We appreciate the opportunity to provide this feedback on behalf of our clients and believe it is equally important that JSA, and the Department of Home Affairs, give equal weighting to the actual labour market experiences of Australian business. In this regard, we have surveyed 20 of our clients to seek their feedback on the draft CSOL, and the information provided in this submission is based on these results. These clients were selected to cover a range of industries including: mining and resources; allied health; hospitality; professional services; global risk management; dredging & maritime; surveying; engineering; government scientific agency; marine, subsea, oil & gas and windfarm industry provider; mining and minerals processing; home automation; exploration geophysics; trading & investment; energy, oil & gas.

The JSA Labour Market Indicator Model notes that the Model was developed to:

- Provide advice on the CSOL for the Core Skills Pathway of the SID visa.
- Target temporary and permanent skilled migration to the current, longer-term, and emerging skills needs of the Australian labour market, taking into consideration the contribution of vocational education and training (VET) and higher education to labour supply.

While the Department of Home Affairs has released some detail in its Migration Strategy on the proposed design of the new Skills in Demand Visa, it is difficult to provide truly informed feedback on



the draft CSOL, without a full appreciation of how the two will interact and accessible the Core Skills Pathway will be to employers, given that there will be a high portion of skilled roles captured by this category.

In developing the new CSOL, JSA has indicated it will analyse *‘whether migration is an appropriate path to address the identified shortages, considering how well migrants do in the labour market upon arrival, reliance on sponsored skilled visa holds relative to employment size and vacancy data, the likelihood of domestic supply for those occupations and the market salary for occupations’*.

Temporary skilled migration, whether through the current TSS program or the previous 457 program, has long proven to be a successful mechanism that allows Australian business and employers to fill skilled vacancies where their needs cannot be met from the local workforce. It has never been a cheap or easy option for employers and is one that is carefully considered before a business decides to proceed. Individuals entering Australia under these programs are not migrants by definition and while there is no shortage of evidence to demonstrate the difficulties that migrants, and in particular, the difficulties independent skilled migrants face trying to enter the workforce upon arrival, these should not be conflated. Temporary employer sponsored visa holders arrive with a guaranteed job and with skills that have been determined by an employer as crucial to their needs and business operations.

A successful temporary skilled migration program must be one that is simple and responsive to changing business needs. The Department of Home Affairs has acknowledged this is currently not the case, and we would hope that the future SID program and available occupations are flexible enough to meet the needs and support future growth of Australian business.

The information included below is based on the direct feedback of our clients, and where in relation to the draft lists released, our clients have provided the following feedback:

#### **Draft CSOL Confident On-List**

No specific feedback has been provided in relation to this list.

#### **Draft CSOL Confident Off-List**

In relation to the occupations on this list, we have received feedback on retention of the following occupations:

- Restaurant Manager (141111) – our client runs multiple fine dining restaurants in Queensland and has two foreign candidates currently progressing 482 visa applications. The client



undertook extensive labour market testing, and the candidate pool included applications from a high number of foreign candidates both in Australia and offshore, who were ultimately found to have all the required qualities for the roles.

- Marine Surveyor (231215) – our client is a multi-national business providing global risk management, survey and audit services to various Australian business sectors including maritime, renewable energy, oil and gas, NDIS, and health. The occupation of Marine Surveyor is crucial to the client’s maritime business which operates under its own global surveying codes, and it takes years to train and develop individuals into these roles. The business has been navigating a talent shortage in the market for several years, and maintaining access to this occupation would allow the business to transfer employees from overseas to fill local gaps where the needs arise.
- Ships Master (ANZSCO 231213), Ships Officer (231214) and Marine Transport Professionals (231299). Our client operating in the marine and dredging sector is unable to get qualified and experienced Masters/Ship Officers or Marine Transport Professionals in the Australian market due to their vessel being foreign flagged and having a higher standard of qualification required than a domestic vessel. An inability to sponsor these professionals would likely result in the business needing to leave the Australian market and our client expects other international dredging companies would be in the same position, resulting in the collapse of the dredging industry in Australia.
- Earth Science Technician (ANZSCO 311412) – our client operating in the Gold Mining industry indicates that access to this occupation would allow them to sponsor geology and field technicians, as the business has faced ongoing challenges sourcing and retaining good quality candidates. The business has also faced difficulties finding good quality, skilled ICT Business Analysts/Systems Analysts (ANZSCO 261111/261112) willing to be engaged in site-based work.
- Environmental Research Scientist (ANZSCO 234313) – the Bureau of Meteorology would be seeking to retain access to this role under the new Skills in Demand visa, as this role is not always easy to fill from the local market. Research Scientists at the Bureau are exploring the frontiers of science and technology, tackling some of the biggest challenges of our time. Their areas of focus include weather and environmental prediction, climate variability and change, Earth system modelling, water research and space weather research. The Bureau is expanding its capabilities for multidisciplinary Earth sciences, social sciences, next-generation scientific high-performance computing and transformative approaches to data science, and Research Scientists are instrumental in driving these innovations. In summary, Research Scientists are integral to the Bureau’s mission of providing essential environmental intelligence. Under the Bureau’s Enterprise Agreement, this occupation would not be captured under the Specialist Skills Pathway.
- A mining client operating in a remote regional area has faced difficulties over a prolonged period in recruiting the following occupations for multiple factors, exacerbated further by their



regional location. Occupations include: Electronic Engineering Draftsperson (312411), Environmental Health Officer (251311), Environmental Research Scientist (ANZSCO 234313), Exercise Physiologist (234915), Health Promotion Officer (251911), Hydrographer Technical Services (311415), ICT Customer Support Officer (313112), ICT Project Manager (135112), ICT Support Engineer (263212), ICT Support Technicians nec (313199), Lift Mechanic (341113), Production Manager (Mining) (133513), Public Relations Manager (131114), Specialist Managers nec (139999), Telecommunications Engineer (263311), Training and Development Professionals (223311).

- Our home automation client requires continued access to the following trade occupations which they cannot find locally: Electrician (General) (341111), Cabler (Data and Communications) (342411), Electronic Equipment Trades Worker (342313), Telecommunications Technician (342414).

## Draft CSOL Targeted for Consultation List

In relation to the consultation list, our clients have indicated a continued need to maintain access to the following occupations, for the reasons outlined:

Occupation	Client Industry	Reason
Accountant (221111) Management Accountant (221112)	Professional services – engineering	Hard to find qualified people who can do the work and take initiative.
Environmental Engineer (233915) Environmental Consultant (234312)	Professional services - engineering	Growing demand from client, and few experienced people in Australia in this field. While there is a lot of junior talent coming through, there are not many medium to senior/experienced people available in the market.
Data Analyst (224114) Data Scientist (224115)	Professional services – engineering	Same as above, there is a lack of medium/senior talent specialised in environment data analysis.
Chef (351311)	Restaurant Industry – Fine Dining	Extreme shortage of local skilled talent, including chefs with international food experience required for positions that responsible for creation and preparation of new menu items.
Cook (351411)	Restaurant Industry – Fine Dining	Extreme shortage of local skilled talent, including chefs with international food experience required for positions that responsible for creation and preparation of new menu items.
Quality Assurance Manager (139916)	Global risk management, certification, survey & audit (operating in various sectors including maritime, renewable	This role sits within the certification and assurance business unit and is hard to fill locally due to knowledge requirements, and having the ability to



Occupation	Client Industry	Reason
	energies, oil & gas, NDIS, health)	transfer someone from an overseas business would help to close the talent gap locally.
Technical Sales Representative nec (225499)	Global risk management, certification, survey & audit (operating in various sectors including maritime, renewable energies, oil & gas, NDIS, health)	This role sits within the certification and assurance business unit and is hard to fill locally due to knowledge requirements, and having the ability to transfer someone from an overseas business would help to close the talent gap locally.
Mechanical Engineer (233512)	Global risk management, certification, survey & audit (operating in various sectors including maritime, renewable energies, oil & gas, NDIS, health)	This role sits within the renewable engineering business which is hard to fill and transferring someone from overseas within the company would be of significant help to close the talent gap locally.
Earth Science Technician (311412)	Gold Mining	Requires access to these roles to sponsor geology and field technicians, as these have proven difficult to find and retain.
Technical Sales Representatives nec (225499)	Manufacturing & Engineering	Within the business, these roles require specialised skills which are critical to the business, and they have often had to source candidates from overseas to fill due to skills shortages.
Mechanical Engineer (233512)	Manufacturing & Engineering	Within the business, these roles require specialised skills which are critical to the business, and they have often had to source candidates from overseas to fill due to skills shortages.
Finance Manager (132211) HR Manager (132311) Project Builder (133112) Supply & Distribution Manager – Supply Chain (133611) Procurement Manager – Supply Chain (133612) Medical Administrator – Medical Superintendent (134211) Laboratory Manager – Processing (139913) Quality Assurance Manager – Technical Services (139913) Regulatory Affairs Manager HSEC (139917)	Mining & Minerals processing – remote regional Queensland)	In each of these occupations, the business has been facing difficulty sourcing skilled individuals with industry experience from the local market, willing to commit to regional employment.



Occupation	Client Industry	Reason
Accommodation & Hospitality Managers nec (141999) Fleet Manager Engineering & Maintenance (149411) Technical Writer Engineering & Maintenance (212415) Accountant (General) (221111) Management Accountant (221112) HR Advisor (223111) Workplace Relations Adviser (223113) Data Analyst (224114) Data Scientist (224115) Statistician (224116) Supply Chain Analyst (224714)		
Environmental Engineer (233915)	Professional Services – Geoscience and Engineering	These skills are in demand in Australia. The occupation can sometimes be seen as Environmental Scientist depending on where the qualification was completed.
Data Analyst (224114) Data Scientist (224115)	Exploration Geophysics	Unable to find roles in the data processing department for people with this background.
Corporate General Manager (111211) Corporate Services Manager (132111) Finance Manager (132211) Management Accountant (221112)	Trading/Investment	This company's headquarters sends intra-corporate transferees for these positions frequently and these are important within the corporate structure.
Finance Manager (132211) Human Resource Manager (132311) Production Manager (Manufacturing) (133512) Supply & Distribution Manager (133611) Procurement Manager (133612)	Mining – regional/remote Western Australia	These roles are critical to operations and challenging to fill locally in a competitive market.



Occupation	Client Industry	Reason
Management Accountant (221112) Chemical Engineer (233111) Mechanical Engineer (233512) Production or Plant Engineer (233513)		
Earth Science Technician (311412) Electronics Engineer (233411) Electronic Equipment Trades Worker (342313) Surveying or Spatial Science technician (312116)	Geophysical Airborne Survey	These positions are all required within the Geophysical Systems Department and can be very difficult to fill locally.
Gas or Petroleum Operator (399212) Procurement Manager (133612) Mechanical Engineer (233512) Electrical Engineering Technician (312312) Mechanical Engineering Technician (312512)	Energy, Oil & Gas	These positions have and continue to be difficult to fill locally due to ongoing shortages of skilled professionals in this field.

**Measures to fill positions in from the local labour market**

During the last 12 months, and based on client survey responses the following avenues were used to try to fill vacancies locally:

- 100% of clients advertised on national platforms (Seek, Indeed etc)
- 78% of clients advertised on their company website.
- 42% of clients advertised on industry association websites.
- 63% of clients participated in graduate recruitment/job fairs.
- 36% of clients filled roles through apprenticeships, where the roles did not require individuals with established post-qualification skills and experience.
- 57% of clients engaged in targeted/executive head hunting.



## Identified occupations likely to be recruited in the next two years

Our clients have indicated the following occupations will be in their top three for recruitment during the next two years:

Client Industry	Occupation 1	Occupation 2	Occupation 3	Other/Additional
Allied Health (community, acute, aged care)	Occupational Therapist	Speech Therapist	Physiotherapist	Dietitian Podiatrist
Professional services – Engineering	Hydrogeologist	Environmental Engineers (with mine closure experience)	Tailings Dam Civil Engineer	
Hospitality – Fine Dining	Chef	Restaurant Manager	Venue Manager	Cook
Global risk management, certification, survey & audit	Marine Surveyor	Engineering Professionals nec		
Dredging & Maritime	Ships Master	Ships Officer	Marine Transport Professionals nec	Able Seaman
Gold Mining	Geologist	Mine Engineer	Earth Science Technicians	
Surveying	Surveyor	Survey Technician		
Manufacturing & Engineering	Fitter and Turner	Technical Sales	Mechanical Engineer	Automation Engineer
██████████	Meteorologist	Environmental Research Scientist		
Marine, Subsea, Oil & Gas, Windfarm	Engineers	Surveyors	Offshore Specialist Inspection Technicians	ROV Operators
Mining and Minerals processing	Mining Engineers, Geologists, and other Earth Science related roles	Supply Chain Professionals	HSEC (Health, Safety, Environment and Community) professionals	ICT Human Resources
Home Automation	342313	342111		
Professional services – Geoscience & Engineering	Civil Engineers	Environmental Science/Engineer	Mining Engineers	
Exploration Geophysics	Data Processor	Geophysicist		
Trading & Investment	Corporate General Manager	Corporate Services Manager	CEO or Managing Director	





Client Industry	Occupation 1	Occupation 2	Occupation 3	Other/Additional
Mining	Electricians	Maintenance Technicians – Fitters and Boilermakers		
Geophysical Airborne Survey	Earth Science Technician	Electrical Engineering Technician	Surveying or Spatial Science Technician	
Energy, Oil & Gas	Engineers	CT Operators	Diesel Mechanics	Frac Operators, Wireline Operators and Supervisors

**What do our clients consider when determining there is a skills shortage for certain occupations?**

Of the responses received, the following determining factors have been highlighted by our clients, when considering whether a skills shortage exists for the occupations that have found difficult to fill locally:

- 47% of clients undertook direct research.
- 42% considered information provided via industry associations, chambers of commerce etc.
- 36% considered conversations with members of the general public and/or people outside of their industry.
- 73% considered conversations with business contacts and/or people within their industry.
- 73% considered the direct experience within their organisation.
- 42% considered data/labour market research conducted by other organisations.

This would indicate that while data is useful as a measure of things at a point in time, it is what is happening in the market as experienced by businesses and the industries within which they operate, that is given more weight.

**Why do our clients use the employer sponsored visa framework?**

Through the responses received, our clients have indicated the following main drivers:

- 78% are seeking to increase the number of skilled employees to help drive business growth.
- 68% are seeking to replace a skilled employee (ie vacancies created through employee turnover)
- 84% are seeking specialist skills not readily available or accessible in Australia.
- 52% are seeking to retain skilled employees in the business (the sponsored employee may be helping to alleviate workloads/pressures and/or may be helping to lead or upskill local employees)



- 31% are seeking to foster innovation or new business.

Other reasons listed included:

- To bring growth to regional areas; and
- To support transfers and secondments of staff from associated offshore entities within a larger global consulting business.

Our migration business at its core is focused on assisting corporate Australia with navigating the employer sponsored frameworks and can provide JSA with experience-based insights on the needs of Australian business. In the most recent 12-month period this has included a marked increase in the need to sponsor skilled trades workers from overseas. This has included a first time need for the sponsorship of trade occupations from long term users of the program who have previously only used the programs for 'white collar' professional roles.

These businesses have all indicated that they are now in a position where this cannot be avoided. Given this, we and our clients have a high level of concern about the potential removal of trades workers from the CSOL, and the indication that skilled trade workers earning more than \$135,000 per annum, would not be eligible for sponsorship under the specialist skills pathway.

If JSA would like to speak to any of our surveyed clients directly, please let us know. While our private clients have preferred to have their responses provided anonymously in this report, they would be willing to engage directly with JSA to provide further information.

We and our clients thank you for your consideration of the information outlined above.

Yours sincerely

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[Redacted contact information]