



**MASTER
PLUMBERS**
AUSTRALIA AND
NEW ZEALAND

21 May 2024

Jobs and Skills Australia

Draft Core Skills Occupations List for Consultation

Via email to CoreSkillsList@jobsandskills.gov.au

Dear Madam/Sir

Draft Core Skills Occupations List for Consultation

Thank you for the opportunity to contribute to the Draft Core Skills Occupations List (CSOL) for Consultation. This submission is from Master Plumbers Australia and New Zealand (MPANZ).

MPANZ, through its constituent Master Plumber associations in every Australian State and Territory and New Zealand, represents tens of thousands of plumbing contractors from sole operators to medium sized plumbing businesses and large contracting firms. Across more than 30,000 businesses our members install, service and maintain domestic and commercial gas, water reticulation and irrigation systems, heating and cooling, mechanical services and air conditioning systems, sanitary disposal, drainage, metal roofing, and a range of other plumbing services. MPANZ constituent associations also provide training services directly through Registered Training Organisations (RTO) and/or Group Training Organisations (GTO); partner with or advise public TAFE providers. We therefore have a great deal of experience and expertise in skills training policy and delivery.

As well as employing thousands of people and contributing billions of dollars to the economies of Australia and New Zealand, our members and their employees are keeping the community safe from a range of water and air borne hazards, toxins, and associated risks.

The Australian Government's Migration Strategy was released on 11 December 2023 and has the stated aim to provide a roadmap for the future reform of Australia's migration system. The Strategy established a formal role for Jobs and Skills Australia in defining Australia's skill needs and notes that the Minister for Immigration, Citizenship and Multicultural Affairs is the decision maker on the final CSOL. Jobs And Skills Australia is responsible for labour market analysis and stakeholder engagement which will inform the Government's final decisions on the CSOL that will target the temporary skilled migration system to Australia's workforce needs.

As MPANZ understands it, Jobs And Skills Australia has developed a Migration Labour Market Indicator Model to develop and then provide advice to the Government on the CSOL. Consistent with the feedback we have provided in various consultation forums and meetings to date, we believe the methodology which underpins the Draft CSOL list is questionable and the outcome in not placing plumbing, amongst other building and construction trades, on the priority list, is difficult to fathom.

We note the correspondence to Jobs And Skills Australia dated 26 April 2024 from the Australian Chamber of Commerce and Industry highlighting concerns about the current consultation process and we support the position that ACCI has taken.



We reiterate that industry is highly reliant on data collected and analysed by government and its agencies, and the plumbing industry is not resourced to collect independent data. We also note that industry has some difficulty in isolating plumbing employment-related and training data from the broader building/construction dataset as agencies do not always publish (even undertake) analysis at the disaggregated level to isolate plumbing. This is further exacerbated by the only recent setup of BuildSkills Australia, the Jobs and Skills Council for the built environment. While we expect Buildskills to provide rich information on our industry in the future, it is still building its capability and capacity to do so at the current time.

A consultation process therefore in which Jobs And Skills Australia requests that industry produce its own evidence to make its case for priority consideration and not rely on that already produced by Jobs and Skills Australia creates a paradoxical situation for us.

What we do know is that the Australian government has a \$10 billion National Housing and Homelessness Plan that aims to build 1.2 million new homes over five years from 2024. The delivery of this plan will require an army of workers in the building and construction industry. BuildSkills has confirmed the industry would need an additional 90,000 trades workers to deliver just on the July 2024 quarter housing targets.

MPANZ also notes that Master Builders Australia analysis of Australian Bureau of Statistics data, NCVER data and its own surveys of members makes three critical conclusions:

- the Australian building and construction industry needs more workers;
- the domestic building and construction workforce cannot keep up with short-term demand; and
- all skilled trades, including plumbing, are in shortage in Australia and are unsuccessfully seeking to fill vacancies.

The experience of MPANZ constituent associations and the approximate 30,000 plumbing businesses they collectively represent reinforces these conclusions.

The work our members do is also ‘mission critical’ in terms of the energy transition and climate change adaptation more broadly. The catalytic and enabling nature of plumbing means it is arguably one of the most critical trades in the economy. The safety and amenity of the entire built environment, and therefore the community, is plumbing dependent. The energy transition is also reliant on plumbing, drainage and gasfitting related skills.

Ensuring the training sector functions effectively and delivers the contemporary skills the industry needs to lead the way in adapting to climate change is critical and is a pressing priority issue for our industry. To take advantage of all the innovations in water capture, storage, re-use and recycling; to transition the economy away from fossil fuels to renewables; and to achieve its housing and infrastructure targets; the economy will need a strong pipeline of skilled plumbing practitioners. This pipeline, however, cannot be met in the short term.

A plumbing apprenticeship appropriately requires four years’ study and experience, and is the basic entry point to work in our industry. To become a contractor, employing plumbers and being able to certify compliance of works, can take another two years. Improving and better resourcing the training system to deliver comprehensive plumbing qualifications therefore is the key priority for MPANZ given

its necessity for Australia’s prosperity and liveability, but unfortunately is not a short-term solution to the current workforce shortages.

MPANZ notes the removal of tradespeople from the *Specialist Skills* pathway in the proposed *Skills in Demand* visa and we do not agree with the differentiation between highly paid trade workers from and ‘white-collar’ professions.

Given skilled trade workers cannot enter Australia through the *Specialist Skills* pathway, nor the *Essential Skills* pathway, we argue that they must be a priority on CSOL so they can enter Australia via the *Core Skills* pathway.

MPANZ therefore can see no rationale for relegating any parts of the plumbing industry (defined by relevant ANZSCO codes) from the ‘*Confident On List*’.

We note that the following are on the *Targeted for Consultation List*.

334112	Airconditioning and Mechanical Services Plumber
334115	Roof Plumber
334116	Plumber (General)
334117	Fire Protection Plumber
312115	Plumbing Inspector

We note that the following are on the *Confident On List*.

334113	Drainer
334114	Gasfitter

In August 2023 MPANZ highlighted in submissions to the Australian Bureau of Statistics its concerns about anomalies, incorrect contemporary definitions and missing occupations across these categories; so it is not surprising that the assignment of occupations to each of the above categories is incorrect and disappointing.

We note yet again in submitting to an Australian government agency that the scope of regulated plumbing varies across Australian jurisdictions.

As one example, Victoria has the broadest scope of regulation with both ‘Drainer’ and ‘Gasfitter’ being in the scope of regulated plumbing (i.e. being considered as a plumber in the Victorian regulatory context). It makes little sense therefore that ‘Plumber (General)’ would be off the CSOL list while only two of its component license categories are on. Numerous other unworkable permutations exist across Australia depending on which jurisdictions are compared.

Compounding the perplexing exclusions outlined above is the convoluted and expensive Trades Recognition Australia process which through its burden of red tape and expense appears to actively dissuade migrant workers from coming to Australia to work in the plumbing industry.

Australia requires a minimum standard qualification through the national training package of Certificate III in Plumbing. We maintain that this apprenticeship-based qualification is considered the minimum level for working as a plumber in our industry. Formal gap training, up to the full completion



of the Australian qualification, must be required for overseas trained entrants to Australia to be eligible to work as a registered or licensed plumber in Australia.

As it stands, the skilled migration system is not operating as efficiently or effectively as it could and should be and is proving to be prohibitively complex to navigate for migrants and their prospective employers who we represent. Our members are frustrated by the multiple layers of assessment and approval required and the opaque nature of the decision-making process.

Accessing Offshore Training Skills Recognition assessment providers is an important part of the current process, yet many of our employer members cannot access these providers which are in Melbourne and Brisbane only. Our members tell us that the system is too slow and unresponsive, and that the lack of alignment between federal and state based regulatory and licencing requirements complicates an already unwieldy process.

As MPANZ submitted in our October 2023 response to the Skilled Migration Discussion Paper, it is vitally important for our industry, and the economy more broadly, that the Australian skilled migration system be updated and contemporised. We strongly believe that Australia needs a system that:

- actively facilitates and enables the timely transition of skilled workers from overseas into employment which directly utilises those skills;
- is user friendly, efficient, and predictable for both migrants and employers; and
- is equitable and provides employers from all parts of Australia with fair access to key assessment providers.

We believe the current draft CSOL outcomes put forward by Jobs and Skills Australia will substantively compound the current shortfalls in the skilled migration system and make skilled migration for the plumbing industry completely out of reach.

We therefore repeat our position that all the above plumbing occupations must be included on the *Confident On List*. To exclude any would not only be illogical, but counterintuitive to Australia's workforce needs.

Thank you once more the opportunity to contribute to this important public policy development process. We would welcome the opportunity to discuss our views further.

Should you wish to discuss this submission, please do not hesitate to contact [REDACTED]
[REDACTED]

Yours faithfully,

[REDACTED]

[REDACTED] **Master Plumbers Australia and New Zealand**