#### **Submitter information**

Please provide your name and phone number,	and preferred email address for contact if it is
different from the one used to send this form:	

#### s 9(2)(g)(i), s 9(2)(a)

In what capacity are you providing feedback?

e.g. on behalf of: your company, the company you work for, an industry organisation, a union, a licensed immigration adviser etc.

Licensed Immigration Adviser

If you are representing a company or group, what is the name of that group?

Migration Advice Limited

What industry or industries does that group work in?

Professional Services - Immigration Advice

In your company or industry, what are the most common occupations for migrant workers?

N/A

What visa categories are commonly used by those workers?

I.e. resident visa, Essential Skills work visa, Work-to-Residence work visa (under the Talent or Long Term Skill Shortage List categories), Post-Study work visa (open or employer assisted), open work visa.

N/A

Only answer the following questions if you directly employ migrant workers:

How many migrant workers do you currently employ? (Refer to the visa categories in the question above)

N/A

Have you supported an Essential Skills visa application for any of these workers?

N/A

### Using wage or salary information to help determine skill level and access to Essential Skills migrants

Proposal 1: Introduction of remuneration thresholds to determine skill levels and associated visa conditions for Essential Skills visas

Consider the proposal of aligning the remuneration thresholds for the Essential Skills visa with the remuneration thresholds for the Skilled Migrant Category.

What impacts or implications do you foresee from defining lower-, mid- and higher-skilled Essential Skills migrants in this way?

Give details of the occupations or sectors and wage or salary levels you are thinking of.

Defining skill levels on the basis on income is not a good criteria to grant visas especially for occupations which are already in skill shortage. On one hand New Zealand needs these people, on the other hand INZ is trying to discourage them. How do we intend to address this problem for occupations in such as Chef de Partie, Trade Workers, Pharmacy Technicians, etc. where the incomes listed for these occupations on www.careers.govt.nz is much less than the proposed remunerations? Many of the occupations listed in the skill shortage lists are mid to high skill at level 1-3. For example, Apiarist is a skill level 1 occupation, Chef de Partie and Pharmacy Technician are skill level 2 occupations. An apiarist generally earns less than a pharmacy technician despite being a higher skill level. Most of the times ANZSCO is right in determining the core tasks of these professions and that's the maximum such professions can earn. Making the grant of visas only on the basis of remuneration is totally greedy and does not address the skill shortages that New Zealand has. Hence, the occupations from skill shortages should be exempt from policy changes.

# Reinforcing the temporary nature of the Essential Skills visa and managing the settlement expectations of temporary migrants

Proposal 2a: Introduction of a maximum duration for lower-skilled Essential Skills migrants

Consider the option of a three years for a maximum duration for lower-skilled Essential Skills visas.

What impac s or implications do you foresee from the proposed maximum duration for lower-skilled Essential Skills visa holders?

Give details of the occupations and industries you are thinking of.

For the reasons stated above, occupations in skill shortage should be exempt from policy changes.

Proposal 2b: Introduction of stand down period for lower-skilled Essential Skills migrants

Consider the option for a year-long stand down period following the maximum duration for lower-skilled Essential Skills visas.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

For the reasons stated above, occupations in skill shortage should be exempt from policy changes.

Proposal 3: Require the partners of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right

Consider the proposal to require the partners of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

For the reasons stated above, occupations in skill shortage should be exempt from policy changes. Furthermore, if partners of people in skill shortage occupations can come along, it will be an encouraging factor for such people.

Proposal 4: Require the children of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right

Consider the proposal to require the children of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

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For the reasons stated above, occupations in skill shortage should be exempt from policy changes. Furthermore, if children of people in skill shortage occupations can come along, it will be an encouraging factor for such people.

## Reinforce that Essential Skills visas should only be granted for the period for which the employment is offered

Proposal 5: Make it explicit how the 'period of employment' condition applies to seasonal work

Consider the option to reinforce that Essential Skills visas for seasonal work are only for the length of the season and that the offer of employment must match the length of the season.

What impacts or implications do you foresee from these options?

Give details of the occupations or sectors you think are likely to be affected.

No comments

Consider the list of seasonal occupations being considered.

Are there any seasonal occupations that should be added or removed from this list? Why?

No comments

Consider the list of seasonal occupations being considered.

If you employ seasonal staff, or represent a sector with seasonal staff:

- What are the occupations of the seasonal staff within the sector that you are commenting on?
- For each of the occupations that you have identified, what is the typical period that you require seasonal staff to cover (e.g the peak of the season)?

No comments

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