

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.

On behalf of the company I work for.

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

Theland Purata Farm Group Ltd

Theland Tahī Farm Group Ltd

What industry or industries does that group work in?

Dairy Farming

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

Dairy Farm Assistants, Assistant Herd Managers, Herd Managers

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.

Work Visa, Working Holiday Visa

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)

34 Purata & Taharua

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

Yes

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.

The proposed minimum salary threshold for SMC will put significant financial pressure on employers as the options outlined are significantly higher than the current minimum hourly rate of \$15.75 .

According to recent data from Federated Farmers, the average Dairy Farm Assistant base salary is \$41,000 + accommodation

Our current salaries for Dairy Farm Assistants, \$49,120 (total package) Assistant Herd Managers, \$51,120 (total package) and Herd Managers, \$62,800 (total package).

The minimum salary proposed would mean that we would need to increase our total package for Farm Assistants to \$65,293.

The majority of our employees on work visas are in these positions but under this proposal, they would not qualify for the Essential Skills visa if the remuneration thresholds outlined in proposal 1 is accepted.

We work hard to continually train all of our people across the business and progress them through their careers in dairy farming.

The proposal does not make any allowance for the investment into training and development of essential skills required. A person fitting the "Skilled Migrant Category" would still be required to start at a more junior role in a commercial dairy farm to learn the essential practical skills of this role. This is evidenced by the majority of New Zealand university graduates, who have an aspiration for a career in Farm Management, needing to start at Herd Manager assistant or Herd Manager levels to build their practical knowledge, on-farm know how and their seasonal management organisational skills before they are able to progress into

Farm Manager roles.

This is the same for our migrant workers on work visas, a large proportion of them are suitably tertiary qualified and educated but still require the time at the more junior roles to build the practical context for their qualification and theory based knowledge to be applied to.

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 impacts 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.

This will have a severe impact on the dairy farming industry as overseas workers will not be attracted to work in New Zealand if they limited to a maximum of 3 years. It is expensive for immigrants to come to New Zealand, they are a long way from their families whom they can only visit every year or two due to the time and cost of returning home to visit. Consequently they will look to work in other countries rather than NZ if this proposal is accepted.

We currently advertise all vacant positions on Farm Source, Canterbury Skills Hub and have also started using an agricultural recruitment specialist No8HR.

Very few New Zealanders apply. We would not be able to resource our farm teams without employing overseas workers. We are working hard to address the fundamental issues of hours and remuneration and now offer competitive packages for all employees, hours are managed, housing on farm is of a high standard and remuneration rates are competitive with trade type jobs.

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.

It will be very difficult to attract the experienced workers from Sri Lanka, the Philippines and South America, that the dairy farming industry, particularly in Canterbury needs to resource the farms.

The cost of managing a 1 year stand down period and the risk of not being accepted for a work visa at the end of that year will be a significant detraction from working in New Zealand.

Studies supplied by Immigration New Zealand also highlight the productivity curve that follows migration, with a 3 month settling in period and then a 3 – 6 month unsettled period as people are required to apply for their visa's.

The proposal as it stands would result in a significant drop in production from migrant workers due to the uncertainty of having to apply for a visa every 12 months and then the knowledge that at the end of 3 years they have to return home/stand down from New Zealand with a high risk of not being granted any further visa's.

The research Immigration New Zealand completed would suggest you are reducing potential productivity by 30 – 50% for these people.

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.

Partners of lower-skilled Essential Skills visa holders may not be eligible for a visa in their own right. Often they have experience in the occupation they are working in but no qualifications. This will make the prospect of coming to New Zealand to work less attractive and reduce the number and quality of migrants seeking to work in New Zealand.

We have often found the partners of Essential Skills visa holders to offer a productive and helpful contribution to our business and having them able to work part time, support seasonal work such as calf rearing, or support work such as record keeping and administration on farm can be hugely beneficial to the entire farm team.

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.

It will be difficult for children to meet the requirements if they have to apply for a visa in their own right. They are usually of school age which means that they have no work experience or qualifications.

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.

The cost of migrants completing immigration processes, then travelling and relocating in New Zealand for seasonal work will be prohibitive.

Currently this appears to work well for pacific island migrants in the summer seasonal work industry of horticulture.

New Zealand dairy farming seasonal work is primarily only for 4 – 6 weeks over August and September. The use of seasonal workers is also reducing as farm businesses increase their staffing ratio's to address underlying issues of hours worked. Hence a permanent team is sought to reduce total hours worked through peak periods and support the ability to manage good rosters, hours and annual leave options throughout the year.

Consider the list of seasonal occupations being considered.

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

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)?

Dairy Farming – calf rearing and on-farm work over the calving period.

Calf rearing 6 – 8 weeks over August and September.

On-farm work 4 – 6 weeks over August and September