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30 November 2017

Ms Helen Innes  
Branch Manager  
Migration Policy  
Department of Employment  
[Helen.Innes@employment.gov.au](mailto:Helen.Innes@employment.gov.au)

Dear Helen,

Thank you for inviting us to be part of the consultation process on the Skilled Migration Occupation List. Following our meeting, which we found very informative and beneficial, the Australian Chamber would like to highlight the following which has relevance to the ongoing review process, and to some extent the specifics of the current review:

- It is important that it remains as a bi-annual review of STSOL and MLTSSL to ensure it best reflects labour market conditions. It may be at some time in the future, once per year is sufficient, but at the moment, the important issue is for the programme to be responsive and for companies and industry to have their say. This is particularly important for small businesses who may not have the resources or awareness of large businesses as to what impact the changes will have on their operations. They may discover the issues only when they apply.
- The current analysis and data sets do not fully reflect the global pressures on workforces and industries. Industry intelligence will be the best source to understand the significance of particular occupations to growth given the global environment. By way of example, we cited the retail buyer who in ANZSCO is only at skill level 3, but yet this role in a global and highly competitive retail environment has enormous influence on the competitiveness of Australian retail companies. Fortunately this occupation, including merchandise planner, was reinstated to STSOL in the last review, but I would envisage there will be strong arguments from the retail sector that they should be on the MLTSSL.
- Although caveats add some complication to the regulatory framework and processing time, they are an important mechanism to provide nuance and flexibility. They are particularly relevant for the 'Not Elsewhere Classified (NEC)' occupations which have largely been removed from eligibility. Our example of the Hot Air Ballooning industry effectively highlights the considerable roadblocks present for niche industries to hire short term skilled migrants to fill the labour shortage they face in peak seasons. Commercial Balloon pilots are not under a classification of their own and hence fall under 'Air Transport Professionals NEC' which is not on the STSOL and MLTSSL. Until such time as ANZSCO is reviewed to more correctly categorise commercial balloon pilots, it is important that 'Air Transport professional NEC' be reinstated with a caveat that the only occupation eligible under that classification is Commercial Balloon pilots. We understand that the Balloon industry is making a separate submission seeking:

Air Transport Professional NEC classification be reinstated as being eligible on the short term skills list. As evidence will only be provided for the need for commercial

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balloon pilots to be eligible for temporary skilled migration it is accepted that the solution would be that the Air Transport professional NEC be reinstated with a caveat that the only occupation eligible under that classification is Commercial Balloon pilots.

- A similar example was provided in relation to the Industrial Glass blower which currently falls under Tradesperson NEC. That company will provide evidence of the critical need for those skills and the dependence of other jobs on access to skilled migration. A similar, caveated approach will be required in that situation.
- We understand that our members are looking to make submissions regarding upgrading Cooks and Restaurant Managers to the MLTSSL, reinstating Travel Agency Managers to the STSOL and not removing Accommodation and Hotel Managers NEC from the STSOL. We urge the Department to favourably consider these recommendations based on the evidence submitted by our members.
- By way of reinforcement of our comments on methodology, the traffic light approach lacks clarity and is particularly not easy to understand at first glance for the general audience. For example, the colour green is used for occupations which are not on any lists (indicating no change has been made) but the general understanding of the colour green is 'go' implying that the occupation is on the list or otherwise eligible. A more user friendly coding system needs to be adopted to indicate inclusions, exclusions and status quo on the lists. After this review and before the next, we would be pleased to work with you on a clearer way of setting out occupations so that businesses can readily understand the status of their relevant occupations including notations about caveats.

Our overall objective in providing input is to ensure that the system is as flexible as possible to meet the needs of the labour market, noting that the direction taken in the April 2017 policy change is not in our view an appropriate policy change to ensure that businesses, no matter where they are located, have the skills they need when they need them in order to survive, grow and employ.

Yours sincerely

**JENNY LAMBERT**

Director – Employment, Education and Training