

# A Migration System for Australia's Future

**ACCI Submission**

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# Introduction

The Australian Chamber of Commerce and Industry (ACCI) welcomes the opportunity to make a submission to the review of Australia's migration system. It is vitally important to not only address Australia's current labour and skills shortages, but also to ensure Australia's migration system is fit for purpose in the long term. As well as achieving cultural diversity, migration is an important element in counteracting our ageing population, supplementing our workforce to fill skills and labour gaps, making us economically stronger, and creating jobs and improving Australia's workforce participation rate. As noted in the 2021 Intergenerational Report, a well-targeted Migration Program can better support our ageing population by supplementing the stock of working-age people, slowing the transition to an older population, and improving Australia's fiscal outcomes.<sup>1</sup> Having an accessible and adaptable migration system will also allow Australia to take a lead role in emerging and growth industries.

The 2021 Intergenerational Report (IGR) shows a clear and positive relationship between migration and economic growth. Not just increasing the number of taxpayers, migration helps boost spending in areas such as housing, retail and tourism. Skilled migrants on average make a lifetime contribution of \$198,000 to Australia's finances, compared with an \$85,000 cost for the general population.<sup>2</sup> Primary employer-sponsored visa holders contribute up to \$557,000.<sup>3</sup> International education is one of Australia's largest export industries worth \$32.4 billion prior to the pandemic restrictions and supporting over 240,000 Australian jobs as well as contributing to the cost of research and educating Australians.<sup>4</sup> Working holiday makers, in addition to being critical to the growth and sustainability of regional and remote tourism businesses, spend approximately two and a half times more than they earn, creating more jobs in the Australian economy.

The terms of reference for the review are addressed throughout this submission. ACCI makes a number of recommendations to ensure Australia's migration system can meet the challenges and opportunities that lie ahead.

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<sup>1</sup> [https://treasury.gov.au/sites/default/files/2021-06/p2021\\_182464.pdf](https://treasury.gov.au/sites/default/files/2021-06/p2021_182464.pdf)

<sup>2</sup> Treasury Paper, ['The lifetime fiscal impact of the Australian permanent migration program'](#), December 2021.

<sup>3</sup> Treasury Paper, ['The lifetime fiscal impact of the Australian permanent migration program'](#), December 2021.

<sup>4</sup> 6 Department of Home Affairs & Treasury 2018, Shaping a Nation, <https://cdn.tspace.gov.au/uploads/sites/107/2018/04/Shaping-a-Nation-1.pdf>

# A Migration System Fit for the Future

## National coordination mechanism

It has become increasingly apparent that Australia would greatly benefit from a national coordination mechanism to better coordinate migration policy both federally and amongst the States. Currently migration policy sits across multiple portfolios and jurisdictions, including, but not limited to the following:

- Department of Home Affairs in relation to general aspects of migration as well as the recent marketing campaign to attract skilled migrants, and collection and management of the Skilling Australians Fund levy
- Austrade and Tourism Australia in relation to working holiday maker (WHM) and marketing initiatives to attract international students and WHM
- Department of Education in relation to international students and temporary graduates, including leading the development of the recent announcement of extension of temporary graduate visas
- Jobs and Skills Australia (formally National Skills Commission) in relation to workforce planning and skills shortage analysis
- Treasury and Centre for Population in relation to population and planning frameworks as well as the economic contribution of migrants
- Individual State and Territory Governments, both in terms of their migration programs as well as recognition of qualifications.

A cross-portfolio, cross-jurisdictional coordination mechanism such as an Inter-Departmental Committee would enable a joined-up approach, ensuring both consistency as well as the ability to share key data and learnings.

## A migration system that suits Australia's workforce needs

It is vital that there is a coordination of labour market analysis and forecasting to ensure decisions regarding skills and training needs, skilled migration occupation lists and employment policy and programs are well-informed by data and evidence from state/territory and national levels. Industry also has a key role in communicating their anticipated workforce development and skilled labour needs. Jobs and Skills Australia should play a key role, and there should be a biennial National Workforce Development Strategy to examine, in depth, Australia's current, emerging and future workforce skills needs and ensure an alignment of our skills development, training and migration systems.

## Composition of Australia's migration system

In developing the migration element of the broader plan to meet Australia's workforce needs, getting the composition of Australia's migration intake right is critical. Australia's migration program consists of humanitarian, permanent migration, and various temporary visas, and each element delivers unique economic and social benefits. The permanent migration program facilitates partners, families and skilled migrants to make Australia their permanent home. Temporary visas facilitate the stay of tourists, working holidaymakers, students and temporary skilled workers in Australia for a limited period of time. It must be

recognised that a combination of temporary and permanent migration options its vital to getting the balance right. Key elements should include the following:

- A **focus on skilled, younger migrants** with a strong component nominated by employers as both temporary and permanent skilled migrants. Skilled migrants are needed to help drive our economic and job-generating enterprises. Skilled migrants not only fill skills gaps, they also transfer their skills to the local workforce, and can train and upskill Australian workers. For many businesses who find it difficult to recruit the skilled workforce they need, in the location and time that they need it, or who need new skills not yet developed here, migration has allowed sustainability and growth.
- A **points-based independent skilled migrant component** that focuses on those skills most in need across the country, and invites people from across the world to come and start a new life here is also a key strength of our current system.
- There needs to a be a **recognition that migration also has an important role to play in addressing chronic labour shortages**, particularly where Australians are not willing or available to meet local or national labour requirements.
- **Valuable working holidaymaker and seasonal worker programs** that deliver enthusiastic and mobile young workers particularly into the regions to provide the labour needed when it is most useful. These workers generally have skills above the seasonal job requirements, which increases the productivity benefit to industries such as agriculture and tourism. This seasonal work is often not attractive or suitable for young unemployed Australians who are looking for longer-term employment options that are closer to their home and support networks.
- **International students** are one of Australia's largest export industries, enhancing the connections between Australia and the rest of the world as well as making a welcome contribution to the workforce.
- A **compassionate humanitarian program** that provides a safe harbour for those most in need.

A combination of temporary and permanent migration options works for all of us. We need to get the balance right in planning for Australia's migration strategy – a balance that can only be delivered by reference to the available evidence. In ACCI's report, [Migration Works for All of Us](#), we set out that the evidence that migration works not just for business, but for everyone, creating jobs and delivering enormous economic and social benefits, particularly when planning is smart, continuous and coordinated. We commend this report to the Review, along with our recent publication [Overcoming Australia's Labour and Skills Shortages](#).

## Permanent migration program

Prior to the pandemic, the decision to reduce the permanent migration intake by 30,000 to 160,000 was already having a negative impact on business' ability to fill skills gaps. The restrictions during the COVID crisis has exacerbated these problems. Effectively halting Australia's migration program for two years resulted in significant gaps arising from business growth or replacing a departing worker.

Going forward, we need to set the cap for permanent migration based on the evidence of economic benefit taking into account the shifts in Net Overseas Migration and natural population increases, and then resource the application process to ensure the outcome is closer to the cap. A strong focus should remain in terms of permanent skilled migration.

## Pathways to permanency

A pathway to permanency for all temporary skilled migrants was another fundamental strength of the system prior to the 2017 and this should be restored. These pathways assist in ensuring that there is a good fit and a firm commitment by a migrant to their new permanent home. As one of the country's leading demographers states this "two-step process is very effective because of the guaranteed employment of the migrant as opposed to the potentially long job search that needs to be undertaken by an independent skilled applicant".<sup>5</sup>

This would increase Australia's global competitiveness in the fight for talent and ensures the best and brightest are attracted and retained. It also has a positive impact on business, reducing employee turnover and enabling businesses to plan long-term.

## Ensuring responsiveness to skill needs – employer sponsored migration

Migration based on skills shortage analysis is important, however not all legitimate skill needs that aren't able to be filled by available domestic labour will show up in national analysis. For example, chefs have multiple cultural cuisine styles which are not interchangeable but are only covered in two occupations, cooks and chefs. A specialist on a particular piece of new machinery may be needed to boost productivity of firm output and to train others to use it. These are real needs even when they do not show in national analysis.

An industrial glassblower needed for our only manufacturer based in Queensland is not even an occupation separately identified in the statistics – it is contained in tradesperson not elsewhere classified – and not available anymore for migration. There have been many examples including floor finishers, hot air balloonists, industrial glass blowers and others, where occupations, particularly in niche but important areas, have been removed from access to skilled migration or became eligible only for short term visas with no pathway to permanency. This has had a very negative impact on those businesses which can no longer access the skills or compete for global talent. There is no evidence that removing these occupations from the skilled migration lists created job opportunities for Australians. Yet there is much evidence to show how business growth and job opportunities for Australians have suffered due to the changes made to the occupations eligible for migration.

Many occupations no longer advertise for staff through conventional means, that is through job sites of job publications. Many jobs, and particularly trade jobs, are filled by word of mouth, through family connections and through informal connections. This is not picked up in the current skill shortages data methodologies and consequently a vast gap exists between skills needed in many industries and those found on skilled migration lists.

This is why it is critical that employer sponsored temporary and permanent migration returns to the situation that existed prior to 2017 – which enabled sponsorship of all skilled occupations. Employer sponsored skilled migration, both permanent and temporary, should again have access to all occupations that are classified as skilled. This ensures the system is responsive to all skill needs, not just national skill shortages.

Employer sponsored migration is the most successful form of migration in Australia. This has immediate employment outcomes guaranteed and provides long term employment experience — the best of all migration pathways. Employer sponsored migrants have consistently delivered positive labour outcomes,

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<sup>5</sup> McDonald, Peter 2016, "Ageing in Australia: Population changes and responses", Population Ageing and Australia's Future, ANU Press, pp.65-83.

which can largely be attributed to having a proven skill set, employment available upon arrival and a relationship with an individual connected to the business and local community.

It is also important to examine how skilled occupations are treated in the migration context, and to ensure our system of identifying which occupations are in fact skilled is responsive and reflective of real industry needs. There are examples of occupations in demolition and rigging work that are in shortage, which are highly paid and highly skilled, however are classified at a lower level – meaning access to Australia’s migration program to fill these genuine skills gaps is limited. All occupations are experiencing technological progress and the nature of work and job roles are constantly changing. ANZSCO not only needs to identify new jobs, but also needs to regularly appraise the duties within their job and assign or adjust an appropriate skill level. An out-of-date ANZSCO denies fair access to important migration programs and unreasonably complicates the regulation of the program due to the need for work-around style caveats in order to meet business’ needs. Regular review of major statistical infrastructure such as the ANZSCO needs to be built into the normal operating budget of the ABS.

## Addressing chronic labour shortages

Businesses such as abattoirs and poultry plants as well as seasonal industries rely heavily on migrant workers, as Australians are often not willing or available to do that type of work. Australia has understandably built a culture of aspiration for young people to work in a high skilled, knowledge economy, but work that does not fit this description is still required to be undertaken, and will be for years to come. In regional areas skills shortages have even more profound business and community impacts. There needs to be a recognition that migration also has an important role to play in addressing chronic labour shortages, particularly in occupations that Australians are less willing to do or are unwilling to travel to for the purposes of employment. The need to fill these types of roles needs to be recognised, and workable solutions need to be explored, such as expanding the PALM visa scheme.

## Supporting the needs of our regions

The Australian migration system also needs to support the needs of our regions, both for permanent settlement and to satisfy the significant demand for seasonal work, both skilled and unskilled, in tourism and agriculture. Australia is a large continent and although our workforce has, to some extent, demonstrated its willingness to relocate for work, the proportion of workers and families that are willing to move long distances is falling.<sup>6</sup> It is often not possible to have the workers available where and when needed. This is true for our growing cities as well as in our regions. It is difficult to attract people to make a move to a regional location particularly for seasonal work, whether or not it is a skilled job. Yet regional-growth industries such as tourism, mining and agriculture are generating jobs and wealth for Australia, and are spreading that wealth across Australia.<sup>7</sup> Those businesses need people willing to work in all corners of our country.

Regional migration should be encouraged, and it is essential that we support migration policies that successfully meet regional skill and labour needs. This is about putting positive policies in place that support regional jobs growth, and encouraging migrants to fill job needs (including the difficult to satisfy seasonal needs), with a carrot and not the stick approach. Employer sponsored migration, both permanent and temporary, is the best way to achieve this. It is not workable to restrict movement of migrants, and we should not aim to satisfy regional needs at the expense of metropolitan areas.

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<sup>6</sup> The Australian Bureau of Statistics Census 2016, Census of Population and Housing: Reflecting Australia - Stories from the Census, 2016, <http://www.abs.gov.au/ausstats/abs@.nsf/Lookup/by%20Subject/2071.0~2016~Main%20Features~Population%20Shift:%20Understanding%20Internal%20Migration%20in%20Australia~69>

<sup>7</sup> The Australian Bureau of Statistics 2018, 8155.0 Australian Industry 2016-17, <http://www.abs.gov.au/ausstats/abs@.nsf/0/48791677FF5B2814CA256A1D0001FECED?Opendocument>



## Working holiday makers

Working holiday makers are an important component of Australia's visitor and labour market. The flexibility and value of WHM to the seasonal labour needs of Australian businesses, especially in the regions is substantial. Seasonal work is often not attractive to young unemployed Australians who want long-term and local employment solutions. The WHM program delivers enthusiastic and mobile young workers to regions where labour is most needed and valued.

We need to ensure the policy settings are right so that we have sufficient access to this pool of labour. This includes measures such as including 3 months of work in the tourism and hospitality sector as eligible work to qualify for a second WHM visa and expanding it to include areas beyond the current 'northern or remote and very remote Australia' qualifying regions.

## International students and graduates

The settings of international student visas in relation to work rights, post study work rights and permanent visa pathways should also be examined.

There has been much discussion about the appropriate number of hours international students should be permitted to work, particularly given the temporary lifting of the restriction on the usual 40 hour per fortnight cap. It would be beneficial to retain unrestricted working hours for a longer period until Australia's current critical labour shortages are eased, particularly in industries such as tourism and hospitality, ensuring at all times that students maintain course progression. In the longer term, it is important that the amount of permitted working hours supports the integrity of the international education system.

It is vital that Australia is a competitor in the international education market as competition is fierce and countries such as Canada have attractive migration settings that look to tap international students for settlement by offering them a pathway to permanent residency.<sup>8</sup>

The Government's recent announcement that post-study work rights for international students studying certain courses will be increased by an additional two years was an important first step in enhancing Australia's international student market competitiveness and strengthening the pipeline of skilled labour.

While the eligibility of this is yet to be settled, ACCI proposes that the increase of post-study work rights should apply to current temporary graduate visa holders, and not be limited to future graduates. Additionally, the extended post-study work rights period should apply to all degree holders and not be limited to select degrees in areas of verified skills shortages – at least during times of severe skills shortages.

Finally, consideration should be given to further increasing the post study work rights of international students on the Graduate Work stream of the 485 visa, rather than limiting it to the Post-Study Work stream, i.e. degree-level and above. A four-year work visa would greatly benefit industries such as automotive, tourism and hospitality, where the majority of qualifications are below degree-level and which is currently experiencing significant workforce shortages.

Temporary graduate visas should be of an appropriate duration to enable international graduates to gain the skilled work experience they need to meet requirements for skilled visas, particularly employer-sponsored visas. If they do transition to permanent migration, this is a benefit for Australia – we have not had to fund their education and yet we benefit from the skills they have, in large part, acquired here.

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<sup>8</sup> The PIE 2021, Canada to offer permanent residence to 40,000 international grads, < <https://thepienews.com/news/canada-to-offer-permanent-residence-to-40000-international-grads-in-2021/>>.

## Business events visas

When considering our migration system, it is important to also consider the business events sector. Prior to the COVID restrictions, over 43.7 million people attended more than 484,000 business events across Australia. These business events directly generated \$35.7 billion in direct expenditure, \$17.2 billion in direct value added, and 229,000 direct jobs. Getting the settings right not only assists the business events sector, but has flow on effects, driving economic prosperity for Australia.

While the bulk of delegates enter on a visitor visa, many professionals in the industry, including speakers, specialised technical crew and other professionals also need to enter on temporary work visas (typically subclasses 408 or 400). With expert event personnel that travel globally with the international business event regarded as 'Short Stay Specialists', Australia is seen as uncompetitive. Feedback is that the paperwork per employee is complex, expensive, and unnecessarily requires the applicant to evidence that they are not taking a local job during the 1-2 weeks they are scheduled to deliver the event in Australia. Reforms to simplify the temporary work visa subclasses to reflect the low risk of these applicants would be welcomed.

ACCI supports the establishment of the International Event Coordinator Network, which provides valuable advice to event organisers on a range of events. It would be beneficial if this was more broadly publicised so that more event organisers are aware of the network and therefore more participants can benefit.

# Effectively utilising the migration system

## Appropriate support in using the system

Employers need assistance in navigating the system, understanding and overcoming the barriers, and ensuring awareness of their obligations and requirements as a sponsor. Due to the sheer complexity of the system, there are reports that many employers are unable to navigate the system without engaging a paid migration agent.

The Industry Outreach Officers Program, which was discontinued in 2014, was a highly regarded and valuable program that attached experienced migration professionals from the Department to industry employer bodies. While the Business, Industry and Regional Outreach (BIRO) network has provided some valuable assistance to employers, feedback is that the assistance is not as in-depth as it was previously. A system should be in place that facilitates both the in-depth assistance of the previous Industry Outreach Officers program as well as the broad-reach of the BIRO program.

## Timely visa processing

Earlier in the year it was reportedly taking three times longer than before the pandemic to process skilled visa applications, leading some overseas workers to take jobs in other countries. While additional funding was allocated to accelerate visa processing and resolve the visa backlog, resources must be allocated on an ongoing basis, so Australia doesn't miss opportunities to fill skills gaps with talent choosing to go to other countries due to delays in visa processing. We also need to get the balance right in terms of processing priorities, so that small businesses with only the occasional need to use the system are not inadvertently impacted.

It is imperative the visa and migration approval time cycles are significantly reduced. To meet international competitiveness industry in Australia needs to be dynamic and able to meet quickly changing work requirements. Industry feedback on this issue is that the current system of accessing international skills is laborious, expensive and complicated.

## Skills recognition and skills assessments

A key part of being able to effectively utilise Australia's migration system is ensuring we can appropriately harness the skills of migrants. A report by Deloitte Access Economics (2018) suggested that in Queensland, for example, 49 in every 100 skilled migrants are not utilising the skills and experience gained before arriving in Australia, often due to lack of recognition of their qualification (25 per cent). Improved recognition processes that clearly indicate where international qualifications and equivalent to Australian qualifications is needed. A good example of this can be found on the German skills recognition portal that is used to attract and recognise the skills of aspirant migrants and skilled visa workers.<sup>9</sup> There needs to be an examination of how we can better and more consistently recognise the skills and qualifications of migrants, while at the same time preserving legitimate safety and quality standards.

The skills assessment process can be time consuming and costly, often requiring lengthy technical assessments for occupations, such as in the automotive sector, that may have very similar training standards and qualifications in the home country to that of Australia. The delays caused by the skills assessment process often deters strong candidates from pursuing their application in Australia, with the

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<sup>9</sup> <https://www.anerkennung-in-deutschland.de/html/en/index.php>

likely loss of talented candidates to other countries. The skills assessment processes must be reviewed and tightened to enable a more holistic streamlined assessment process. Consideration should also be given to harnessing the opportunities digital technology brings, for example by allowing the uploading of videos of the completion of tasks where appropriate.

## English language requirements

English language requirements for skilled visas should be set commensurate to the level of English required for the occupation, or class of occupations. For example, a journalist needs a much higher level of English than a bricklayer, however under the current system both require competent English. The English language requirement for skilled visas should be reviewed.

## Labour market testing

It is common ground that where Australians with the relevant skills are available, they should fill job vacancies. Employers face many existing barriers when using the highly regulated and expensive skilled migration program and these barriers are already a very strong incentive for employers to employ Australian workers as a first priority. Sponsoring a migrant is costly – in fees and levies, as well as being time-consuming. The TSS requires numerous compliance requirements that a migrant must meet to be eligible for a temporary skilled visa.

On top of these barriers, the laws have strengthened in the last few years to require labour market testing (LMT), which is an obligation on employers to advertise and report results before hiring a temporary skilled migrant. The process does not add much value to achieving the recruitment of Australians first (it is likely that numerous attempts to recruit Australians were made before reaching out to a migrant), but it significantly adds to the red tape burden.

Based on the lack of evidence of its effectiveness and due to the high regulatory burden, labour market testing for the TSS visa program should be removed. If LMT is retained, it should be more targeted at over-reliance, where an organisation or industry relies too heavily on skilled migration on an ongoing basis. Alternatively, LMT processes should be streamlined to reduce the high regulatory burden. It was recommended by the Joint Standing Committee on Migration that LMT be reformed to take better account of current business recruitment timelines and practices.

## Skilling Australians Fund (SAF) Levy

ACCI has held concerns with the SAF levy since its commencement as part of the *Migration Amendment (Skilling Australians Fund) Act 2018*, particularly the excessive quantum of the levy, the upfront fee collection, inadequate refund policy, and lack of an alternative to the levy when strong investment by the sponsoring employer in training is evident.

There is a lack of transparency and reporting on the use of the funds collected and it is likely that those industries making the biggest contribution to the fund are not benefiting through the application of the collected funds.

It is acknowledged there is a community expectation that those utilising the skilled migration program demonstrate a commitment to training Australians. This commitment could be demonstrated either through a training levy that is half of the current rate or by evidence of strong investment by the sponsoring employer in training. This was approach proposed by the Joint Standing Committee on Migration (JSCOM) in its Interim Report in relation to its Inquiry into Australia's Skilled Migration Program.

## Strengthening labour market participation and economic contribution of migrants

While there should be a strong focus on skilled migrants in Australia's migration system, there is also a great opportunity to strengthen labour market participation of other migrants, including family and humanitarian migrants and the partners of skilled migrants.

There are some positive programs run by state governments, for example the initiative funded by the Victorian Government, involving a partnership with the Victorian Chamber of Commerce and Industry and Youth Activating Youth (YAY) to improve pathways for multicultural youth experiencing barriers to employment, including people seeking asylum and refugees, and newly arrived migrants.<sup>10</sup> The NSW Government also has refugee support initiatives which are designed to support refugees through access to fee-free training and providing employment support aimed at achieving long-term skilled employment.<sup>11</sup> Given the benefits, similar programs should be run at a national level. We note the Government is considering a replacement to Youth Jobs PaTH program which provides pre-employment training, placement and post-placement support – there would be merit in extending any such replacement program to migrants who would benefit from such a program.

## Housing and infrastructure

To ensure we can reap the benefits of a strong migration system, we need to address concerns relating to housing stock and availability. This is particularly the case in the regions, where the available of suitable housing to rent or buy makes it very difficult for employers to attract and retain employees. The poor quality of critical infrastructure, such as transport (roads, rail and air services), energy, telecommunications, water and other utilities, and soft infrastructure such as training, education and health services, is also a major barrier to attracting people to regional areas.

We need to address these concerns, not through trying to restrict our economic and job generating powerhouses but by planning and managing better. Action needs to be taken to increase the availability and affordability of housing, particularly in the regions, to assist with the supply of available workers and the ability to attract migrants to the regions.

## Ensuring migration integrity

In ensuring the attractiveness of any migration system, migration integrity should be a key element. This should be approached through appropriate compliance mechanisms and data sharing to ensure migrants are being paid in accordance with the law and employer commitments under their sponsorship. In addition, some employers have reported reluctance in hiring migrations due to confusion about work rights. Increased education and support for employers would also be useful in ensuring both compliance and increased utilisation of the system.

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<sup>10</sup> <https://www.victorianchamber.com.au/news/new-program-to-improve-multicultural-youth-employment-pathways>

<sup>11</sup> <https://education.nsw.gov.au/skills-nsw/students-and-job-seekers/low-cost-and-free-training-options/support-for-refugees-asylum-seekers.html>

# Summary of recommendations

## A migration system fit for the future

1. Implement a cross-portfolio, cross-jurisdictional coordination mechanism, such as an Inter-Departmental Committee, to better coordinate migration policy both federally and amongst the States.
2. Ensure Jobs and Skills Australia has a key role in coordination of labour market analysis and forecasting and align skills development and migration strategies based on labour market needs.
3. Ensure an appropriately balanced migration system, with a combination of temporary and permanent migration as well as a composition that best suits Australia's workforce needs, determined by reference to the available evidence.
4. Increase the permanent migration intake, with a strong focus on permanent skilled migration.
5. Enable pathways to permanency for all temporary skilled migrants.
6. Ensure access to all skilled occupations for employers nominating workers under the employer sponsored temporary and permanent skilled streams.
7. In the context of workforce planning and skilled migration, ACCI recommends the Federal Government commit to fund the ABS to ensure that regular reviews of the ANZSCO are incorporated into the ABS Forward Work Plan and that the intervals between reviews are in line with world best practice.
8. There needs to be a recognition that migration also has an important role to play in addressing chronic labour shortages, particularly in occupations that Australians are less willing to do or locations Australians are less willing to relocate to, and workable solutions need to be explored, such as expanding the PALM visa scheme.
9. Put in place positive policies to support regional jobs growth and encourage migrants to fill job needs by enabling appropriate access to employer sponsored migration for all skilled occupations.
10. Ensure policy settings encourage sufficient access to working holiday makers, including measures such as including 3 months of work in the tourism and hospitality sector as eligible work to qualify for a second WHM visa expanding it to include areas beyond the current 'northern or remote and very remote Australia' qualifying regions.
11. Retain unrestricted working hours for a longer period until the critical labour shortages are eased, particularly in industries such as tourism and hospitality, ensuring at all times that students maintain course progression. In the longer term, it is important that the amount of permitted working hours supports the integrity of the international education system.
12. Extend the eligibility of the recently announced longer temporary graduate visas to attract and reward high performing students, particularly in areas of greatest skill needs, in particular by:
  - a. Allowing current and temporary graduate visa holders, not just future graduates, to stay and work longer
  - b. Extending additional work rights to all graduates, not limited to select degrees, for at least the next financial year, reflecting the reality that businesses are facing significant workforce shortages in all industries across the country

- c. Extending temporary graduate work visas by an additional two years to boost the workforce where university degrees are not required (i.e. the Graduate Work stream of the 485 visa, rather than limited it to the Post-Study Work stream).
13. Implement a long-term post-study work rights strategy is needed that allows recent international students who have graduated in Australia to follow a pathway to permanency.
14. Consider reforms to simplify the temporary work visa subclasses for expert business events personnel (typically subclasses 408 or 400) to reflect the low risk of these applicants.

### **Ensuring effective utilisation of the migration system**

15. Appropriately fund a program to support businesses in navigating the migration system. A program should be in place that allows the assistance of the previous Industry Outreach Officers program as well as the broad-reach of the BIRO program.
16. Speed up processing times by maintaining extra personnel and monitoring prioritisation to ensure small businesses are not disadvantaged.
17. Examination how we can better and more consistently recognise the skills and qualifications of migrants, while at the same time preserving legitimate safety and quality standards.
18. Review and streamline the skills assessment process to enable a more holistic streamlined assessment process and make use of technological advances to assess skills where appropriate.
19. Review the English language requirement for skilled visas.
20. Reduce regulatory red tape, including removing labour market testing for skill occupations based on the lack of evidence of its effectiveness, or reduce the heavy requirements.
21. Allow sponsoring employers to demonstrate their commitment to training by either (at the sponsor's choice) paying a training levy set at half the current rate, or providing evidence of existing spending on training at either the equivalent of 1% of payroll, or equivalent to the amount of the levy for each visa applicant. Expand the refund criteria to include any unsuccessful applications.
22. Run programs to strengthen labour market participation of migrants, such as family and humanitarian migrants and partners of skilled migrations. Consider expanding programs such as the replacement to the Youth Jobs PaTH program to migrants who would benefit from such a program.
23. Take action to increase the availability and affordability of housing, particularly in the regions, to assist with the supply of available workers and the ability to attract migrants to the regions.
24. Tackle migration integrity through appropriate compliance mechanisms and data sharing to ensure migrants are being paid in accordance with the law and employer commitments under their sponsorship.

## About ACCI

The Australian Chamber of Commerce and Industry represents hundreds of thousands of businesses in every state and territory and across all industries. Ranging from small and medium enterprises to the largest companies, our network employs millions of people.

ACCI strives to make Australia the best place in the world to do business – so that Australians have the jobs, living standards and opportunities to which they aspire.

We seek to create an environment in which businesspeople, employees and independent contractors can achieve their potential as part of a dynamic private sector. We encourage entrepreneurship and innovation to achieve prosperity, economic growth and jobs.

We focus on issues that impact on business, including economics, trade, workplace relations, work health and safety, and employment, education and training.

We advocate for Australian business in public debate and to policy decision-makers, including ministers, shadow ministers, other members of parliament, ministerial policy advisors, public servants, regulators and other national agencies. We represent Australian business in international forums.

We represent the broad interests of the private sector rather than individual clients or a narrow sectional interest.



# ACCI Members

## State and Territory Chambers



## Industry Associations





**Australian  
Chamber of Commerce  
and Industry**