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Ministry of Business, Innovation, and Employment
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**SUBMISSION ON BEHALF OF THAI RESTAURANT INDUSTRY OF NEW ZEALAND
IN RESPONSE TO PROPOSAL TO AMEND THE IMMIGRATION REQUIREMENTS**

PREPARED BY:

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PURPOSE OF THIS SUBMISSION

The author of this submission seeks for **an exemption on the three year limitation on Ethnic Thai Chef profession**. The author of this submission shall explain the nature of Thai restaurant industry in New Zealand and the need for an exemption to be in place for seamless operation of this industry. The author shall also explain in detail about the consequence of this new limitation to this industry and that the exemption on this profession is not likely to have any detrimental impact on the government's three main concerns for this immigration rule change. The author shall strive to provide available statistics as much as possible to support this submission. Where accurate statistic is not available, a reasonable estimate shall be provided.

INTRODUCTION

1. The Thai Ethnic group comprised of 8,052 people living in New Zealand as of 5 March 2013.¹ 81.2% (6,537 people) lived in the North Island and 18.8% (1,512 people) lived in the South Island. Three people lived in the Chatham Islands.²

2. The most common region to live was the Auckland region (51.6% or 4,152 people), followed by the Canterbury Region (10.4% or 834 people), and the Wellington Region (9.8% or 789 people).³

THAI RESTAURANT INDUSTRY IN NEW ZEALAND

3. Due to the worldwide popularity of Thai cuisine, Thai restaurants become one of the most popular business choices for New Zealanders of Thai ethnicity who have settled permanently in this country. In each restaurant, the management is usually divided into two parts: **front of house** and **kitchen**. Should one of the proprietors has skills and knowledge in authentic Thai cooking, they would usually occupy the head chef position. Contrastingly, where the proprietors have more than one branch or both proprietors lack Thai cooking skills, they shall usually appoint one of the more senior chefs as head chef. The head chef also does the cooking as well as training new chefs who arrive from Thailand to be familiar with the New Zealand system, as well as controlling the quality of the meals they serve to the customers.

4. Due to the long term shortage of Ethnic Thai Chefs in New Zealand, most, (if not all) Thai restaurant proprietors source Ethnic Thai Chefs from Thailand. Apart from Ethnic Thai chefs, most (if not all) other staffs in the restaurants are locals who shall work in various roles, namely servers, barpersons, kitchen assistants, duty managers, cleaners, etc. The proprietor themselves usually occupy the manager position.

5. As of today (24 April 2017), there are 404 Thai eateries in New Zealand listed on global review site TripAdvisor.⁴ 135 of them are in the Auckland Region, 65 in Canterbury, 26 in Otago, 12 in the Nelson-Tasman Region, 5 in Southland, 17 in Marlborough, 3 in West Coast, 25 in the Wellington Region, 20 in the Manawatu-Wanganui Region, 4 in Taranaki, 15 in Hawke's Bay, 3 in the Gisborne Region, 20 in Bay of Plenty, 34 in Waikato, and 20 in Northland. There is no Thai eatery in Stewart Island and the Chatham Islands.

6. According to the author's estimate from talking to many of the proprietors, 60% of Thai restaurants in one city shall have the average monthly sale of \$20,000 - \$40,000.00.⁵ Thirty percent shall have the average monthly sale of \$50,000 to \$80,000. The remaining ten percent shall

¹ Statistics New Zealand (2013) 2013 Census, *2013 Ethnic Group Profile* [online] Available: http://www.stats.govt.nz/Census/2013-census/profile-and-summary-reports/ethnic-profiles.aspx?request_value=24736&tabname=Populationandgeography [24 April 2017].

² Ibid

³ Ibid

⁴ www.tripadvisor.co.nz

⁵ Unless specified otherwise, all figures are assumed to be GST-inclusive.

have the average monthly sale of \$100,000 to \$200,000. Therefore, the rough estimate using the lowest figure of the monthly sales illustrates the total sales of Thai restaurants across New Zealand shall be approximately \$14,990,000.00. In other words, the annual turnover from this industry is approximately \$179,880,000.00.

7. The cost of ingredients is usually 30% of the total sales; accordingly, the Thai restaurant industry in New Zealand should contribute approximately \$53,964,000.00 to food/beverages suppliers alone. Wages are usually 35% of the total sales. This means the industry pays \$62,958,000 of wages⁶ annually. The wages for Thai chefs on work visas shall vary between 33% of the total wages for restaurants where one of the proprietors themselves is the head chef, to 40% of the total wages for restaurants where the proprietors have no knowledge in Thai cooking and appoint the head chef to be in charge of the kitchen. We shall use the higher percentage as a rough estimate that 40% of the wages are for chefs. Hence, it may be argued that this industry pays \$37,774,800.00 or 60% of its total wages to locals who occupy other roles in the restaurants. The proprietors themselves shall also be considered as locals, as most (if not all) of them would work in that restaurant as one of the staffs as well.

8. According to the current statistic, the national median salary for chef *de partie* is seventeen dollars and twenty one cents per hour,⁷ with junior chef *de partie* starts earning from fifteen dollars and thirty-three cents per hour as of 25 March 2017.⁸ It is appropriate to compare Thai chefs to the position of chef *de partie*, as Thai restaurants usually would have one to three chef(s) doing the stir fry and another one doing the appetisers, soups, salads, and curries. The current market rate for Thai chefs in New Zealand is seventeen dollars per hour. Although slightly lower by the industry standard by twenty one cents, this rate is widely accepted as a fair remuneration for two reasons. First, the chefs themselves would enjoy an extra benefit of complimentary meals on every working shift. Secondly, as the average chef salary in Thailand is THB15,000.00 per month,⁹ (approximately NZ\$622.72)¹⁰, the remuneration rate in New Zealand is significantly higher. This, combined with the legal right to take four weeks paid annual leave (which most chefs do to visit their families in Thailand), make working in New Zealand a much more attractive option.

THE CURRENT IMMIGRATION POLICY AND THE CHALLENGES THIS INDUSTRY POSE TO INCOMING CHEFS FROM THAILAND

9. There is currently no limit on the number of times migrants can be granted an Essential Skills Visa, as long as they continue to meet the market test.¹¹ As Thai chefs are jobs in the long

⁶ Unless specified otherwise, all wages are assumed to be gross.

⁷ Payscale (15 April 2017) Hourly Rate for Industry [online] Available:

http://www.payscale.com/research/NZ/Industry=Restaurant/Hourly_Rate [25 April 2017].

⁸ Ibid, available: http://www.payscale.com/research/NZ/Job=Chef_de_Partie/Hourly_Rate [25 April 2017].

⁹ Salary Explorer (2017) Salary Survey in Thailand, *Average and Median Monthly Salary Comparison in Thailand in Food/Hospitality/Tourism/Catering*, [online] Available:

<http://www.salaryexplorer.com/salary-survey.php?loc=215&loctype=1&jobtype=1&job=28> [25 April 2017].

¹⁰ Based on the exchange rate of NZ\$1.00 = THB 24.10 on 25 April 2017 on xe.com/currencyconverter.

¹¹ Ministry of Business, Innovation, and Employment (19 April 2017) Discussion Document, *Suite of Proposed Changes to the Essential Skills Visa*, [online] Available:

term skill shortage list, most (if not all) Thai restaurant proprietors usually initiate the process to renew their chefs' work visas two months prior to the visa expiry. First, they would advertise for one month on nationwide media. The advertisement would usually attract no application from New Zealand residents. In rare circumstances where applications are received, most (if not all) applications would come from unqualified applicants¹² who possess neither the skill nor the knowledge in Thai cooking. Consequently, it is not possible for restaurant proprietors to consider those applications. Following the expiry of the advertisement, each chef shall lodge their applications to renew their work visas. Their renewals are usually approved and the operation of such restaurant remains seamless.

10. Where one chef decides to change their workplace to other restaurants or decides to return to Thailand, they shall usually give the proprietors considerable notice for the proprietors to seek a new worker from Thailand. The process usually takes three to six months, as the chefs from Thailand need to take a cooking examination to gain certificate of cookery, compile medical and character evidences, as well as usual bureaucratic delays.

11. **It is not unusual, furthermore, that the proprietors would realise that the chosen applicant is the unsuitable worker once they receive their work visas and arrive in New Zealand.** This is due to many reasons. First, while most chefs who first arrive in New Zealand would have the skills in cooking Thai food for Thai clients, they would need to learn how to cook Thai food for New Zealand clients. New Zealand clients have dining habits which are very different from Thai clients. For example, all main meals served to New Zealand clients are expected to contain decent amount of vegetables. However, some Thai dishes such as *Panang Curry*, *Pad Kratiam Prikthai* (Stir fried Garlic and Pepper), or *Pad Kraprao* (Stir Fried Basil Leaves) are served without vegetables in Thailand.

12. Moreover, some of the ingredients easily sourced in Thailand are not available in New Zealand. For instance, due to lack of papaya availability in New Zealand, Som Tum (Raw Papaya Salad) has to be made with julienne fresh carrots instead. Moreover, ingredients with strong smell such as shrimp paste and/or some brands of fish sauce and tamarind paste cannot be used in New Zealand commercial cooking. New Zealand diners are not familiar with such strong smell and would reject the dishes served with such ingredients for reasons of "disgusting smell". Therefore, it is the job of the restaurant proprietors and other existing chefs in each restaurant to help the new chefs adjusting their cooking techniques to suit the New Zealanders' palate whilst retaining the authentic taste of Thai cuisine in their cooking. This process of transition is considerably stressful and demanding for all newly arrived chefs from Thailand as they will have to re-learn and adjust their cooking techniques considerably. Some of the chefs who stubbornly refuse to change their ways of cooking and/or those who are not capable of adjusting their cooking techniques would be deemed unsuitable. If this occurs, the proprietors would need to terminate their employment agreements prior to the end of 90 day trial period, initiate the process of recruitment for a new worker, and wait a further three to six months before a new chef would arrive.

13. The chefs' refusal and/or inability to adjust their cooking techniques is not the only main

<http://www.mbie.govt.nz/info-services/immigration/consultations/proposed-changes-to-immigration-policy-setting-suite-of-proposed-changes-essential-skills-visa/discussion-document.pdf>, p 11 [25 April 2017].

¹² Currently, the usual prerequisite of being a qualified applicant for an ethnic Thai Chef is Level 4 or 5 Certificate in Cooking and/or at least five years experience in Thai restaurants of a decent standard and/or reputation.

reason why the newly arrived chefs would be deemed unsuitable to join the existing team. The *a la carte* nature of all Thai restaurants in New Zealand also make it difficult for some chefs who have experiences in Thailand hotels to adjust themselves. Many hotels in Thailand hold buffet lunches. Consequently, chefs who have worked in hotels for a long time usually possess a good skill to cook Thai meals of large quantities without the time pressure. They can take time to taste and perfect each item before such meal is brought out on a large plate to the buffet table. However, most (if not all) Thai restaurants in New Zealand serve *a la carte* meals both for dine in and takeaway. During rush hour influx, it is expected that each meal must be prepared in a very short timeframe and possess consistent taste and quality. Accordingly, it is not surprising that some chefs who used to work in hotels would not be able to adjust their skill to cook each main meal quickly and consistently, and would be deemed as unsuitable workers in this country.

14. Finally, there is a problem of incompetent applicants whom Thai restaurant proprietors in New Zealand commonly label them as "fake chefs". These range from chefs who change jobs to different restaurants every six months until they have five year work experience¹³ to those who work in restaurants and/or eateries which specialise in one or two Thai dishes (such as hotpot restaurants, restaurants specialising in North-Eastern Thai Cuisine, noodle houses etc). Due to the nature of their workplaces, the "fake chefs" of the latter category are those who are able to cook only certain types of dishes professionally (for example, North-Eastern Thai Spicy Salads only, *Pad Thai* Noodles only, roast duck only etc) but have little to no experience cooking most of the items which are staple dishes in this country's Thai eateries. Due to the remoteness between Thailand and New Zealand, job interviews are usually done through Skype or telephone. Most proprietors have no opportunity to see and/or taste these applicants' cooking at the time of interview, and they would not know whether the applicant they choose is the 'fake chef' or not until these chefs arrive in New Zealand with work visas. Due to the much higher remuneration New Zealand offers compared to Thailand, furthermore, it is not surprising that these "fake chefs" would overstate their ability in their *curricula vitae* so that they would be chosen by the proprietors. It may be argued that the possibility each proprietor may mistakenly choose the wrong applicant is as high as 50% every time they decide to employ one new chef.

THE PROPOSED CHANGE TO THE CURRENT REQUIREMENT AND ITS PURPOSE

15. Currently, the skill level of an Essential Skills visa holder is determined by ANZSCO,¹⁴ in which chef is considered as a skill level two (mid skill).¹⁵ Nonetheless, Cabinet has agreed, in principle, to introduce remuneration levels to categorise job offers into three skill levels: low skill, mid skill, and high skill.¹⁶ Workers who are paid less than \$23.49 per hour shall be considered as low skill. For chefs to be continued to be classed as mid skill, they shall be paid at least \$23.49 per

¹³ In Thailand, the law allows Employers to impose a six-month probationary period to test whether the job candidate is suitable or not. Employers have the right to terminate the Employment Agreement to any new Employee who has not worked with the Employers before within the first six months of employment.

¹⁴ Above n 11, p 7

¹⁵ Australian Bureau of Statistics (25 June 2009) ANZSCO, First Edition, Revision One [online] Available: <http://www.abs.gov.au/ausstats/abs@.nsf/Product+Lookup/1220.0~First+Edition,+Revision+1~Chapter~UNIT+GR OUP+3513+Chefs> [25 April 2017].

¹⁶ Above n 11, p 8

hour.¹⁷ Should any chef is paid less than \$23.49 per hour, they shall be regarded as low skill workers and they can work in New Zealand for a maximum duration of only three years.¹⁸ Once they have reached the three year limit, they must spend one year outside New Zealand before they are eligible for another Essential Skills visa in a lower-skilled occupation.¹⁹

16. Cabinet gives three reasons to support the three year limit as followed: first, the three year limit encourages migrants who earn less than \$23.49 per hour to upskill or pursue professional development in order to qualify for a higher skill level and thus a further Essential Skills visa that is not subject to maximum duration.²⁰ Secondly, this change may encourage employers to look for other ways to fill jobs which pay less than \$23.49 per hour, for example training local workers, developing their existing employees, or investing in ways to become less reliant on labour-intensive business models.²¹ Thirdly, the maximum duration would reinforce the temporary nature of the visa and ensure that settlement expectations are clear for migrants who earn less than \$23.49 per hour. Nonetheless, Prime Minister Bill English said that the objectives of changes are **to ensure immigrant workers filled genuine shortages, and were not given visas just because employers found it easier to bring in a foreign worker than recruit a local.**²² New Zealand certainly has skill shortages and need to fill the gap.²³ Accordingly, where there are genuine labour or skills shortage, employers will be able to continue to use migrant labour to fill those jobs.²⁴

CONSEQUENCES OF THIS CHANGE TO THAI RESTAURANT INDUSTRY IN NEW ZEALAND

17. It needs to be made clear first that Ethnic Thai Chef is a profession which proprietors cannot train New Zealanders to do. There is no cooking school in New Zealand teaching specialised Asian cooking,²⁵ and local graduate chefs were taught only standard cooking styles.²⁶ All ethnic foods are different, and the subtleties that make for excellent indigenous cuisine cannot be gleaned from reading a recipe.²⁷

18. Thus, Thai restaurants across the country shall be left in a dilemma which contains two equally undesirable choices should the three year limitation becomes law. First, proprietors who

¹⁷ Ibid, p 9

¹⁸ Ibid, p 11

¹⁹ Ibid

²⁰ Ibid, p 11

²¹ Ibid

²² V Small, 'Government to Announce New Moves to Control the Flow of Migrants', (18 April 2017) [online]

Available:

<http://www.stuff.co.nz/national/politics/91675828/government-to-announce-new-moves-to-control-the-flow-of-migrants> [25 April 2017].

²³ Ibid

²⁴ M Woodhouse, 'Changes to Better Manage Immigration', [online] Available:

<https://beehive.govt.nz/release/changes-better-manage-immigration> [25 April 2017].

²⁵ L Tan, 'Ethnic Chefs on the Chopping Block' (17 July 2009) [online] Available:

http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=10584998 [25 April 2017].

²⁶ Ibid

²⁷ Ibid

seek for a seamless operation would be required to increase their chefs' salaries to at least \$23.49 per hour in order for their chefs to be able to continue working for them. **This is even higher than the average salary of \$22.00 per hour for experienced head chefs in New Zealand,**²⁸ consequently, they would invariably end up trading at a loss. Should they try to offset their losses by increasing the prices, moreover, they would lose even more sales as consumers would shift their loyalty to their competitors. They would be left with the business which is ready to create a good product but has very few buyers; consequently, they would have to eventually cease trading.

19. Accordingly, most proprietors would choose the second option: they would replace their chefs every three years so that they can continue to pay them the market rate. This is, however, also an equally risky option as every chef is different. While one meal would taste exactly the same even when it is served by five different servers, the same cannot be said when this same meal is cooked by five different chefs. The quality of that dish would be very different depending on whether a good chef or a bad chef is cooking it.

22. Each Thai restaurant sells a unique product - a product which is a result from that restaurant's recipe, combined with their chefs' expertise in Thai cooking, their knowledge of authentic Thai taste, as well as their good sense of taste. The end result is a delicious meal which customers are happy to pay for it. Nonetheless, for customers to be prepared to pay to enjoy their cooking, the meals they produce need to have good quality and consistency.

23. As explained prior in para 11, even when the newly arrived Ethnic Thai Chef is the "right candidate", it would still take considerable time for them to learn how to cook every single item in the menu to the consistently high standard. In smaller restaurants where there is only one to two chef(s) working there for a long time, the chefs' departure would have a significant impact on the customers' confidence. This is because that chef would know their regular customers' preferences, and customers would invariably doubt whether the newly arrived chef would have the ability to cook the meals to their preference. Even with the smoothest transition where a good chef replaces a good chef, there would undeniably be a downturn period due to regular customers' uncertainty in the new chef's competency.

24. Even now where there is no three year limitation on Ethnic Thai Chefs' work duration, it is already a very difficult situation if a wrong candidate arrives. As explained prior, there is a 50% possibility that a wrong candidate would be chosen every time proprietors make a decision to hire a new chef from Thailand. Assuming that half of the newly arrived chefs are wrong candidates, they will create a huge inconsistency in food quality to Thai restaurants across this country. Customers would complain that their meal experiences are "much worse" than their last visit, and some would stop coming. Sales would drop, demand for food/beverage supplies would be reduced, and some local staffs would have to be made redundant. In an extremely unfortunate circumstance where the proprietors end up having all of their newly arrived chefs to be 'wrong candidates' and are unable to find the right candidates to replace them within six months, the business would lose so much of its regular customers, reputation, and goodwill that the proprietors may have to cease trading. If we are to assume by using the author's estimate in para 7 that 60% of the staffs are New Zealand residents, this new limitation would put a considerable number of locals out of work.

²⁸ Above n 7

25. The author himself has spoken to many proprietors who feel very discouraged by this new limitation that they contemplate to cease trading in the next three years. This is because they are not prepared to handle the stress of finding a new kitchen team every three years and risk choosing a wrong candidate who would destroy their hard earned reputation overnight. **All proprietors the author has spoken to have agreed that this rule change is the biggest obstacle they have ever had since they started trading.**

26. The vast majority of Thai restaurant proprietors are New Zealanders of Thai ethnicity who have settled in New Zealand permanently. In doing so, they undertake a substantial risk by investing a significant part of their own money to establish their eatery. **They then use their knowledge, skill, energy, and their own labour to keep the business afloat so that they can be financially independent and not having to become the burdens to the society. Nevertheless, for Thai restaurant proprietors to remain financially independent, they must also rely on the government to facilitate them with the rules which take into consideration their business needs so that they can continue to run their businesses smoothly.** This is the reason why the author decides to speak up so that the government would know about the negative consequences this new limitation would have to this industry.

REQUEST FOR AN EXEMPTION ON THE THREE YEAR LIMITATION FOR ETHNIC THAI CHEF PROFESSION AND JUSTIFICATION FOR THIS EXEMPTION

27. The author therefore requests the government on behalf of the Thai Restaurant Industry in New Zealand to kindly grant an exemption on the three year limitation to the Ethnic Thai Chef profession. In doing so, the author has carefully studied the government's purpose to implement this limitation and finds that making an exemption to this limitation would not frustrate the purpose of the limitation in any way.

28. First, the Ethnic Thai Chef Profession is the profession which has a genuine shortage. According to the author's experience, our business has advertised approximately three to four times a year to renew our chef's work visas in the past nineteen years. We have never received even one application from qualified New Zealand residents. Moreover, we also have never received even a single application from New Zealand applicants who have studied specialised Asian cooking in tertiary level and have the potential to be trained to fill this role. The author is also confident that other proprietors' experience would be very similar. Therefore, the reason why proprietors must seek Ethnic Thai Chefs from Thailand is not because we do not wish to choose locals. Conversely, it is because there is no local who is qualified for this position.

29. Secondly, it is almost impossible for proprietors to train local workers who occupy other positions in Thai restaurants to become Ethnic Thai Chefs. As explained prior, restaurant management is divided into two parts: **kitchen** and **front of house**. The skills for the kitchen work and front of house work are very different, and even highly experienced front of house workers who have tasted all items in the menu would still not know the cooking techniques for those dishes as they lack basic knowledge of Ethnic Thai cooking.

30. It is also not possible for proprietors to encourage their Ethnic Thai Chefs to pursue professional development so that they would occupy the higher position in the restaurant which

has no limitation on their visa duration. This is because there is no higher position in each restaurant than chefs for kitchen staffs. Restaurant is a small business, not a big corporation. It is also not possible for *a la carte* restaurant proprietors to invest in ways which are less-reliant on labour-intensive models. This is because restaurant industry is an extremely people-focused industry which relies on labour, not technology.²⁹

31. Finally, it may be argued that an exemption of this limitation would not give Ethnic Thai Chefs' false hopes that they may eventually be able to reside in New Zealand permanently after their long stay. As Ethnic Thai Chefs are currently a Level 2 (mid-skill) job on ANZSCO scale as well as a profession in the Long Term Skill Shortage list, it is thus clear that most (if not all) Ethnic Thai Chefs who have worked in New Zealand for two years are always eligible to apply for residency under the current rule should they wish. However, only the small minority of Ethnic Thai Chefs have chosen to do so. The author believes that the reason is because most Ethnic Thai Chefs do not have a serious intention to settle in New Zealand permanently. Most Ethnic Thai Chefs have families in Thailand and they keep their ties with their home country by returning home every year during their annual leave. Chefs in Thailand think that working in Thai restaurants overseas is a prestigious opportunity to make more money than what they would make in Thailand. As Thailand's living costs are much lower than New Zealand, many Ethnic Thai Chefs want to work overseas and save money so that they can have a stable retirement in their home country.

32. Accordingly, the author believes that the government must differentiate between jobs which locals can do and jobs which locals are not interested in doing. Unlike servers, duty managers, bartenders, and restaurant managers, Ethnic Thai Chefs are jobs which locals cannot, and are not interested to do. Therefore, an exemption on the three year limitation on this profession would not result in any job loss for the locals. The contrary may even be argued that the expertise of Ethnic Thai Chefs is what creates jobs for the locals. This is because their knowledge in cooking authentic Thai food to suit western palate would make consumers come to dine at their premises. In order to facilitate the services, the proprietors then hire the locals to serve the product they create. A three year limitation would arguably result in all Thai restaurants across New Zealand being forced to change their "product" every three years. This is more likely to bring more harm than good.

CONCLUSION

33. The Thai Restaurant Industry in New Zealand has a considerable presence in New Zealand Hospitality Industry. The industry contributes considerably to the New Zealand economy, and the proprietors in this industry have a serious intention to continue their seamless operation so that they remain valuable citizens and/or residents and are not burdens to the society. Access to Ethnic Thai Chefs from Thailand through the current legal principle is one of the most important reasons why this industry is able to continue its contribution to the New Zealand economy. The three year limitation imposed on Ethnic Thai Chefs is likely to create a great instability to every Thai eatery in this country and would likely affect the volume of financial contribution this industry has to

²⁹ L Tan, 'Eating Out Could Cost More After Immigration Changes Kick In', (27 April 2017) [online] Available: http://www.nzherald.co.nz/nz/news/article.cfm?c_id=1&objectid=11846425 (27 April 2017).

New Zealand significantly.

34. As justified prior, an exemption on the three year limitation on Ethnic Thai Chef profession would not be inconsistent with the purpose of limitation in any way. The author therefore asks the government to kindly grant an exemption to the three year limitation for this very profession. The author would be happy to answer any queries the government they may have in this submission, and he hopes to hear good news from the government in the near future.

Sincerely

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cc:



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THE AUTHOR WELCOMES ALL THAI RESTAURANT PROPRIETORS IN NEW ZEALAND TO BECOME SIGNATORIES TO DISPLAY THEIR SUPPORT FOR THIS SUBMISSION. THAI RESTAURANT PROPRIETORS WHO WISH TO DISPLAY THEIR SUPPORT FOR THIS SUBMISSION MAY FILL THEIR DETAILS, SIGN, AND GIVE ADDITIONAL COMMENTS (IF ANY). THEY MAY THEN E-MAIL THEIR COPY OF THIS SUBMISSION TO: ESConsultation@mbie.govt.nz

PROPRIETOR(S)' NAME(S)

9(2)(a)

BUSINESS NAME AND ADDRESS

SIGNATURE

PHONE NUMBER

E-MAIL ADDRESS

ADDITIONAL COMMENTS

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