

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) [REDACTED], HR Manager, Hellers Limited. 9(2)(a) [REDACTED]
9(2)(a) [REDACTED]

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 my employer, Hellers Limited

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

Hellers Limited

What industry or industries does that group work in?

Smallgoods manufacturing

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

Meat Process Worker ANZCO 831311 skill level 5

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.

Essential Skills work visa x 68

Working Holiday visa x 14

Open work visa x 14

Partnership visa x 3

Student visa x 1

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)

100 in total, 96 Meat Process Workers + 4 other occupations

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

Yes – 44 supported in last financial year

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.

Overall we support the proposal to require migrants in ANZSCO level four and five occupations to earn above the remuneration threshold to be classed for highly skilled employment, otherwise they would continue to be defined as lower-skilled. This proposal will assist the employee who has moved through the ranks to a senior factory position whom would otherwise not meet the classifications defined in the current list of occupations in the skill shortage lists and so will never be considered under Skilled Migrant Category.

The reality is that our meat process workers cannot progress into the skilled migrant category at the moment so we see this opportunity as a positive one. The proposed change has indicated the remuneration threshold will be either 23.49 for lower skilled or \$35.24 for higher-skilled.

Hellers utilises a skills matrix to ascertain correct pay rates. This matrix allows people to increase their hourly rate based on the skills required within their role and their competency in these tasks. We have a comprehensive training programme which is utilised to achieve competency

\$23.49 – In our matrix to achieve this rate the person would be at a Team/Line Leader level. There are only approximately 25 of these positions in our factories so whilst this proposal may present an opportunity to move into the Skilled Migrant Category it is of no significant assistance to our current staff shortage.

\$35.24 – To gain this rate the person would be a shift leader of 30-40 staff. We only have 10 of these roles in total throughout the company so this opportunity to move into the Skilled Migrant Category is fine for the individual but of no significant assistance with staff shortages to us.

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.

SUMMARY OF POSITION

We do not support the proposed maximum duration for lower-skilled Essential Skills visa holders.

In summary this change is going to affect at least 22% of our current workforce in Canterbury and will mean we will lose the skills and knowledge gained by these migrants over the three years they have worked for us. Costs will increase as we recruit and train new staff and there is an increased risk in both having to lower our selection standards and manage unsuitable New Zealanders on the job. We simply cannot employ enough New Zealanders for our roles and believe special dispensation should be allowed for the employers of Canterbury so that we are not negatively affected by this proposed change in duration.

We believe that Phase 2 which will look at regional needs and policies needs to be accelerated as this change in policy will have significant effect on our long term staffing.

For clarity, we are commenting on the specific impact on Meat Process Workers within Hellers Limited's Canterbury operation.

MBIE's proposal does not set out how the costs incurred by business and New Zealand as a whole is offset by the benefits to employers and NZ of restricting workers to 3 years and introducing a mandatory stand down period. There is no evidence of why this is needed. When MBIE were asked to provide the evidence on their assumption that people on ESV were expecting a path to residency they were not able to provide figures; only anecdotal comments. We do not support the assumptions that migrants on ESV are expecting to stay and become residents of NZ.

Description of business:

Hellers Ltd employs approximately 450 factory staff at its Kaiapoi Smallgoods manufacturing facility, located 19 kilometers north of Christchurch city. We also have another plant in Auckland which employs approximately 150 staff.

It is important to note that the struggle to recruit is specific to the Christchurch plant. We employ approximately 150 staff in the Auckland plant which is located at Wiri, South Auckland. Our staff is approximately 90% Pacific Island with the majority being permanent residents in NZ. We have no trouble recruiting labour in Auckland apart from the usual demographic restrictions that are common to Auckland (distance from home to work).

Hellers Ltd has been in business for 22 years and runs a very successful business out of a modern factory in Kaiapoi, with smaller factories in Hornby and Auckland. In 2014 we purchased the Huttons and Kiwi Bacon brand and equipment and also acquired Santa Rosa for 'value added poultry' in Christchurch in 2016. We have recently acquired Gramart Foods (Trading as Flavour House) to expand our business into making sauces and marinades. We have invested over 12 million dollars in additions to our premises and we have a long term plan to further develop the factory at Kaiapoi to accommodate the expected further growth of the business.

Recruitment issue – New Zealanders:

We struggle to recruit suitable applicants for our factory in Kaiapoi. Ideally we would like to employ a majority of New Zealanders for these roles. However with the large amount of employment opportunities in Canterbury and the low unemployment rate this has become increasingly difficult.

Labour market statistics for Canterbury show that we currently have only 4% unemployment. This is pretty close to what is considered full employment in our region. The NZIER's most recent Quarterly survey of Business Opinion reports that 24% of all employers are finding it hard to get unskilled people.

Our process operators need to be physically fit, have experience working in a production environment, be prepared to start work at our required start times (ie between a 4am to 6am start or midnight or 1am finishes – we operate 2 shifts) and work if required during the weekends. Staff must have transport to work (no bus routes at our start or finish times) and be able to follow strict hygiene and safety procedures.

In addition our Drug & Alcohol policy requires pre-employment screening for all staff. We must have people that are able to operate machinery and handle knives safely and they are working in areas where impairment can cause risk.

This is a significant barrier to a number of potential employees. As an example in January 2017 there was a 61% failure rate of kiwis. In February 2017 there was a 30% failure rate. Most failures are for THC. We make it clear that you cannot work in the factory whilst you are drug impaired. Of our migrants we would have less than 1% fail the pre-employment drug screen.

Manufacturing businesses are limited in the hourly rate that can be paid in order for the products we produce to remain competitive. The smallgoods market is very competitive with significant pressure put on companies by retailers. Hellers can never compete with the hourly rate that staff are paid to work on construction sites.

Actions to recruit New Zealanders:

To put it simply we have tried everything to be an 'employer of choice' in Canterbury. In order to recruit our positions we carry out the following:

1. Positions are advertised on trade me jobs and our external website job board
2. We have on site signage and internal noticeboards advertising the vacancies
3. Positions are regularly advertised with the Canterbury Employment Hub. We contact every applicant provided through the hub and try to arrange interviews. As there is no screening completed by the Hub applicants are often unsuitable and hard to

- contact. Over January and February 2016 we have tried to interview 7 applicants without any successful recruits (4 failed to return calls to arrange interview)
4. We attend the Limited Service Volunteer expos run by WINZ 4 times a year. We arrange for the candidates who are interested in working for us to come to the factory. We have had one successful applicant through this programme although he was not referred by WINZ, rather he approached us direct at the finish of the course.
 5. A presentation was conducted at WINZ Rangiora to approximately 40 work seekers on 20th September 2016 – no successful recruits.
 6. We have a very close relationship with WINZ case managers at Rangiora and are sent all applicants that are considered suitable. In the past we have also employed people recommend to us by the Linwood WINZ branch.
 7. We have an Industry Partnership with MSD so we are able to employ long term Job Seekers and support them in a careers in Smallgoods. We are committed to accepting 10 people. In November 2016 we had 4 referrals (3 did not return calls and 1 was unsuitable). In April 2017 we have had 3 referrals but none of them have returned calls to arrange interviews – no successful recruits.
 8. Youth employment expo (run by WINZ) attended 25th January 2017 – no successful recruits.
 9. We are members of the Canterbury Region Manufacturers Working Group. FMCG, Consumer Packaged and Primary Food Producer employers attend as well as involvement from Government organisations such as MSD, Worksafe, ACC and Immigration New Zealand. The purpose of this workgroup is to work through issues within manufacturing within Christchurch. The lack of New Zealanders for our roles has been a prime issue. As well as addressing common people related issues in our industry and working collaboratively in developing strategies for the benefit of the group, it allows the group to champion key issues (eg looking for ways to manage transport).
 10. We have a Memorandum of Understanding with the Department of Corrections to employ suitable candidates who are on parole or home detention. One employee who was on home detention (has now completed his sentence) is currently still working for us. We have also had a number of women prisoners work in our Wiri and converted one to a full time employee on her release. There have been 2 applicants in Canterbury that we have considered but not progressed due to type of convictions.
 11. Supported people with disabilities by employing hearing impaired people through Workbridge. We currently employ one person working in Kaiapoi and two people working in Wiri. We also attended “a breakfast with Nicky Wagner” to talk about barriers for people with disabilities and how we can make it easier for them to become gainfully employed.

We are at a loss to see what else we can do to employ New Zealanders for roles at the Kaiapoi plant. **How much is enough before the business has to consider whether we continue our expansion in this region?**

Training

We currently use an in house training model to help staff develop their skills. Depending on which department they work in the training takes them through the basic skills needed and then allows for specialisation on the machinery. We utilise a competency model which involves using standardised Job Element Sheets and assessments to these sheets. As staff gain additional skills the skills matrix is used to move people up the pay scale. . In the last financial year we have trained staff in 955 Job elements (Safe Operating Procedures). External training courses are utilised to provide additional skills to team leaders and supervisors with individual Development Plans in place for middle and senior management.

In 2015 5 staff completed the National Certificate in Food and Related Products Processing Level 2 and 5 completed in February 2016. In 2016 another 5 staff completed the National Certificate in Food and Related Products Processing Level 3. We also have put 13 people through "Supervising and Managing Others" in 2016. Another 13 people completed the National Certificate in Health and Safety level 3 in 2016.

Every staff member is fully inducted and attends a "Keeping yourself and other's safe" course to ensure health and safety rules and food hygiene practices are well understood and practiced. In addition our "First Move" manual handling programme is attended and followed up by "moves@hellers" on the factory floor.

We also offer a Government funded literacy programme to assist people to improve their skills and we are currently working on a suite of elearning modules to also assist people to develop the skills we need in the factory.

Union representation

Most of our staff work under Individual Employment Agreements. We have a Collective Agreement with the New Zealand Meat Workers Union which is offered to all staff at employment. As we only have 16% union membership between both sites Union involvement is minimal. We consult with the local delegate and Union Organiser on significant issues and as part of our proposal for change process and with the rest of the staff as appropriate.

Company Culture

Hellers have excellent staff support programmes for our staff. We operate under a company culture "The Way We Work" which was developed by our staff and states acceptable and unacceptable behavior. Our culture document is reviewed by our people on a yearly basis. These cultural values and beliefs are woven into every aspect of our roles at Hellers. They are part of training, staff awards, induction, KPIs, displayed around the factory and also form part of performance management at times.

Staff Support

We are focused on supporting our staff as a community. We offer such programmes/initiatives as:

1. Employee Assistance through our contractor Workplace Support
2. Pastoral Care – HR Advisors and through initiatives such as providing clothing etc when calamity strikes (recently this happened when one of the team lost everything in a house fire)
3. Raising funds for terminally ill staff and outside charities
4. Staff Hardship loans to support staff in need
5. Wellbeing initiatives such as exercise programme, wellness checks, free immunization, free shuttle to mammograms, body audit, cervical smears on site, mens health sessions, quit smoking, weight loss initiatives

Health and Safety

We are committed to health and safety and having our staff go home well every day. All managers are trained in safety leadership and actively carry out safety conversations on the floor. Every staff member has KPIs covering H&S and are regularly consulted in new and

changes to equipment and process. We utilize the Assura system to help us manage h&s and staff are all aware how to report and resolve safety concerns, hazards and incidents.

Details of programmes to employ staff from overseas:

We have utilised the Pacific Access Category for the last three years. People who are successful in the PAC quota are automatically granted New Zealand residency if they have a full time position in New Zealand. We have taken on approximately 40 people through this scheme in the last three years. Our current retention rate of these staff is approximately 61%. Unfortunately the timing of the Fijian cyclone meant some of our staff had to return home to their families and we have noticed a trend of a number of our PAC staff staying in Christchurch for a year and then moving to Auckland to be closer to family. There is no restriction on this group so this movement is uncontrolled. In addition this group required a lot of pastoral care and support with families moving to Christchurch with little or no resources.

The majority of our migrants on Working Holiday or Essential Skills visas come from South American countries. We carry out no advertising but it is "word of mouth" and we get a lot of people contact us to apply for work as the busy season nears. A lot of our migrants are young, single and well-educated with tertiary qualifications. We have people who want to stay with us for a number of years to build up their savings so it can be used when they return home in the future. They do not expect residency.

There is a clear understanding by our migrants that there is very little opportunity for permanent residence in New Zealand. Their deal would be to stay in NZ, working at Hellers for a number of years so they can earn enough money to fund their future. We only have 2 migrants with family and a small number do have partners with them – some of these partners also work in the factory (part of our overall number).

As our migrant numbers have increased (due to the inability to employ enough New Zealanders) in the last 4 years we are seeing more people wishing to stay and work at Hellers for as long as possible. 25% of our current staff on ESV have been working here over 2 years. This will increase as time goes on as we do not expect our needs to change in the future.

Our successful applicants must have a reasonable understanding of English and we have Spanish speaking members of the HR team to assist. It is extremely rare for us to encounter HR breaches with this group of workers.

We have regularly used the Canterbury Employment Hub to gain letters to extend and change visas. We have a good relationship with the Hub and have previously met with team members to help them understand our requirements. Unfortunately the rules around the Hub letters are very onerous and result in double handling and time delays. As we are a FMCG business the time from order to supply is very short and therefore our production plans have to be very flexible. The time and planning we need to use with the Hub is very constraining and we do have to spend a lot of time interviewing applicants who have not been screened first by the Hub and are put forward to us as possible staff but are completely unsuitable.

We operated with an Approval in Principle in the 2016 year and were awarded 90 visas for one year extensions (AIP finished mid-December). We currently have an application with INZ for an additional 60 positions and are awaiting a decision on this.

Training and staff support:

Pastoral care is important to us as we want to support our migrant workforce. We have an HR team member providing this support as well as being part of community initiatives. We are an active member of the Waimakariri District Council's Migrant Settlement committee and provide free workshops and advice to migrants under their remit to support migrants.

As you can see from the above, Hellers Ltd is committed to sourcing and training New Zealanders for our roles but our demand is exceeding the supply of suitable applicants

Process for a migrant worker at Hellers:

1. Generally when they are awarded a role at Hellers they come with the right to work. This will be a Working Holiday visa or a work visa (different time lengths). More uncommon is a partnership or student visa. These staff are employed on a permanent full time basis, fixed term (if there is a genuine reason for this) or casual. This depends on our labour requirements at the time.
2. As visa expiry nears it is common for us to have a conversation with the best workers (or they approach us) for support to stay working at Hellers. We follow a strict process which involves assessing their skills, work performance and gaining support from the line manager. If we believe the person is an excellent performer, has skills we need and has developed their skills we will consider supporting their application for an extension to their visa (or a new Essential Skills visa – depending on the situation).
3. We then refer them to our Immigration Consultant (E-Migration) and pay a fee per person to have the Consultant advise the person, collate and collect the information required for the application, submit it and manage any issues. We supported 44 people with a total cost for last financial year \$15,000. (We do not use the Consultant to lodge all AIP extensions due to the simpler process involved).

Question to INZ: In light of the proposal will INZ give all essential skill visa applicants the full three year term or will they have to reapply each year as at present? My understanding is that the ESV will only be granted for a year. This is a significant cost for the migrant and the company supporting them. The process is onerous and should be simplified. Surely the employer should not have to prove the labour market test yearly for a region like Canterbury.

Impacts on our business

1. Hiring a migrant is not a quick process or a cheap way to recruit staff. We spend \$15000 pa on immigration consultant fees and estimate another \$25000 pa on HR costs to facilitate the process. We would prefer to employ New Zealanders for our roles but we cannot recruit enough suitable staff in Canterbury.
2. We currently have 100 people with essential skills visas. Of these 96 are for Meat Process Workers. This accounts for 22% of our factory staff in Christchurch. If the proposal goes ahead this significant number of staff will have a limited tenure with us.

3. Loss of skills and experience. Once you have been working in the factory for 3 years you are a valuable employee who has generally learned how to use a number of machines or is a skilled operator within the process lines. We will lose that experience. **Will the labour market change in the short to medium term?** We do not believe it will! With the ongoing infrastructure and construction in Canterbury we do not believe there will be a significant increase in the number of New Zealanders looking for manufacturing roles in Canterbury.
4. Manual labour is a significant requirement in our industry – whilst some automation has been introduced our processes are still very labour intensive and require people to perform tasks. We do not see this changing in the medium future and if we do not have enough trained staff we will not be able to meet our production requirements which will impact on the profitability of the business
5. Increased costs. We have calculated the costs of recruitment and training of a staff member as \$2800 per person. So if we have to replace 22% of our workforce the total cost to our business could be \$280,000.
6. Lost labour productivity as new employees continually take time to learn skills and get up to speed. This cost is absorbed into the business reducing margins or increasing prices to our customers.
7. Increased immigration costs, if we assume the person will require support with INZ applications and advice from an Immigration Consultant. It is also unknown whether a visa will be granted for the full 3 years or shorter periods of time which would increase our costs.
8. Increased HR costs to manage issues regarding unsuitable recruits. This is unknown but reasonable to predict that if we are having to lower our selection criteria that there will be more problems with poor behaviour, absenteeism, work quality, productivity etc.
9. Increased H&S risk by employing unsuitable kiwis. If we have to lower our criteria we may have to employ people with ongoing health and injury risks. As Hellers are an ACC Accredited Employer any increased risk will impact directly on our injury costs

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.

We do not support this stand down period for Meat Process workers in the meat processing/smallgoods manufacturing industry in Canterbury.

In summary this change is going to affect at least 22% of our current workforce in Canterbury and will mean we will lose the skills and knowledge gained by these migrants over the three years they have worked for us. Costs will increase as we recruit and train new staff and there is an increased risk in both having to lower our selection standards and manage unsuitable New Zealanders on the job. We simply cannot employ enough New Zealanders for our roles.

We believe special dispensation should be allowed for the employers of Canterbury so that we are not negatively affected by this proposed change in duration.

We believe that Phase 2 which will look at regional needs and policies needs to be accelerated as this change in policy will have significant effect on our long term staffing.

For clarity, we are commenting on the specific impact on Meat Process Workers within Hellers Limited's Canterbury operation.

MBIE's proposal does not set out how the costs incurred by business and New Zealand as a whole is offset by the benefits to employers and NZ of restricting workers to 3 years and introducing a mandatory stand down period. There is no evidence of why this is needed. When MBIE were asked to provide the evidence on their assumption that people on ESV were expecting a path to residency they were not able to provide figures only anecdotal comments. We do not support the assumptions that migrants on ESV are expecting to stay and become residents of NZ.

If the Government is determined to impose a mandatory stand-down we suggest it is made shorter for selected industries and geographical areas. We suggest a 4 – 8 week stand down period and a simplified process for these people to obtain future ESV.

As previously detailed Hellers Ltd have utilised all means to recruit New Zealanders first. There simply are not enough kiwis in Canterbury to fulfil the recruitment needs of our business.

We believe that the proposed changes will significantly impact our business for the following reasons:

1. Hiring a migrant is not a quick process or a cheap way to recruit staff. We spend \$15000 pa on immigration consultant fees and estimate another \$25000 pa on HR costs to facilitate the process. We would prefer to employ New Zealanders for our roles but we cannot recruit enough suitable staff in Canterbury.
2. We currently have 100 people with essential skills visas. Of these 96 are for Meat Process Workers. This accounts for 22% of our factory staff in Christchurch. If the proposal goes ahead this significant number of staff will have a limited tenure with us.
3. Loss of skills and experience. Once you have been working in the factory for 3 years you are a valuable employee who has generally learned how to use a number of machines or is a skilled operator within the process lines. We will lose that experience. **Will the labour market change in the short to medium term?** We do not believe it will! With the ongoing infrastructure and construction in Canterbury we do not believe there will be a significant increase in the number of New Zealanders looking for manufacturing roles in Canterbury.

4. Manual labour is a significant requirement in our industry – whilst some automation has been introduced our processes are still very labour intensive and require people to perform tasks. We do not see this changing in the medium future and if we do not have enough trained staff we will not be able to meet our production requirements which will impact on the profitability of the business.
5. Increased costs. We have calculated the costs of recruitment and training of a staff member as \$2800 per person. So if we have to replace 22% of our workforce the total cost to our business could be \$280,000.
6. Lost labour productivity as new employees continually take time to learn skills and get up to speed. This cost is absorbed into the business reducing margins or increasing prices to our customers.
7. Increased immigration costs, if we assume the person will require support with INZ applications and advice from an Immigration Consultant. It is also unknown whether a visa will be granted for the full 3 years or shorter periods of time which would increase our costs.
8. Increased HR costs to manage issues regarding unsuitable recruits. This is unknown but reasonable to predict that if we are having to lower our selection criteria that there will be more problems with poor behaviour, absenteeism, work quality, productivity etc.
9. Increased H&S risk by employing unsuitable kiwis. If we have to lower our criteria we may have to employ people with ongoing health and injury risks. As Hellers are an ACC Accredited Employer any increased risk will impact directly on our injury costs.

If INZ is determined to impose a mandatory stand-down we suggest it is made shorter for selected industries and geographical areas. We suggest a 4 – 8 week stand down period.

We wish to clarify whether after a mandatory stand down the person is able to work in NZ under the Essential Skills Visa for another 3 years?

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.

We believe the current restrictions and rules are adequate and do not support the proposal that partners of lower-skilled essential skills visa holders have to meet the requirements for a visa in their own right. Our comments relate specifically to the Meat Process Workers in the meat industry.

This proposal would see the whole idea of living and working in New Zealand as less attractive. Some partners may not want to work and therefore would not be eligible to live in New Zealand with their partner.

Other industries may suffer if this were to happen as they may not have the resources or knowledge to support partners to apply and be granted work visas. It may be more of a concern when trying to attract families to industries such as farming.

The partnership visas are not easy to get and so we believe the current steps and processes are adequate.

The biggest impact on this proposal is the fact that it may be seen as less attractive for couples to come to live and work in New Zealand utilising the Essential Skills Visa. The impact is as previously detailed in this submission.

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.

We do not support this proposal to require the children of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right. Specifically we are submitting for Meat Process Workers in the Meat Industry.

This proposal would see the whole idea of living in New Zealand as less attractive. Some families may not want to live in New Zealand if they have to apply for separate visas. There is also the possibility that families could be split if they are not eligible to gain a visa to live with their family.

It is simply not the "kiwi way" to try to separate families. It is unhealthy from a mental health perspective.

It is unclear from the proposal what would happen if a child was born whilst the parent was working on an Essential Skills visa or partnership visa?

Other industries may suffer if this were to happen as they may not have the resources or knowledge to support children to apply and be granted work visas. It may be more of a concern when trying to attract families to industries such as farming

The biggest impact on this proposal is the fact that it may be seen as less attractive for families to come to live and work in New Zealand utilising the Essential Skills Visa. The impact is as previously detailed in this submission.

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 opinion on this proposal as Hellers does not employ people for seasonal work only.

If this change is made how is the season defined?

What happens if the business gains additional work and the season is extended or shortened. It is my understanding that people can only work for the employer for the specified period of the visa so I am not sure what issue this proposal is trying to solve.

Consider the list of seasonal occupations being considered.

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

No opinion as Hellers does not employ seasonal occupations.

Whilst we have a busy season (from September to March) we manage our permanent work force with natural attrition in quiet periods. When we require additional staff to produce Xmas hams we do employ a number of migrant workers but usually on working holiday visas (as the season only goes for 8-10 weeks).

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 comment

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