

## 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:

§ 9(2)(g)(i), § 9(2)(a)

In what capacity are you providing feedback?

e.g. on behalf of: your company, the company you work for, an industry organisation, a union, a licensed immigration adviser etc.

On behalf of our Company : CHRISTINE PRODUCTS LIMITED, 19 TANYA STREET, BROMLEY, CHRISTCHURCH 8062

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

CHRISTINE PRODUCTS LIMITED

What industry or industries does that group work in?

SMALL MANUFACTURING/ENGINEERING COMPANY

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

ENGINEERING AND RELATED TRADES

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.

RESIDENT OR WORK VISA

*Only answer the following questions if you directly employ migrant workers:*

How many migrant workers do you currently employ? (Refer to the visa categories in the question above)

5

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

YES

## Using wage or salary information to help determine skill level and access to Essential Skills migrants

*Proposal 1: Introduction of remuneration thresholds to determine skill levels and associated visa conditions for Essential Skills visas*

Consider the proposal of aligning the remuneration thresholds for the Essential Skills visa with the remuneration thresholds for the Skilled Migrant Category.

What impacts or implications do you foresee from defining lower-, mid- and higher-skilled Essential Skills migrants in this way?

Give details of the occupations or sectors and wage or salary levels you are thinking of.

If an applicant would earn less than the median NZ income of \$48,859, they won't get any points – even if their job was previously considered as skilled.

These income levels are a higher rate that we can afford to pay even our New Zealand workers, and be able to be competitive, manufacturing in New Zealand, to compete with Overseas imports.

Assessing regional differences in wages is important, to ensure those in the regions can still compete to fill our skill shortages through this visa category, if needed.

We do agree, in principal, with setting some minimum salary threshold for skilled migrant visas. However, getting these value right is important to ensure manufacturers, who cannot fill skill shortages with New Zealanders, can still use these visas to find employees with the appropriate skill levels, qualifications or experience.

We believe that additional research is required to make sure these thresholds are set at the correct rate, and that they are reviewed over time. Different Industries have different salary levels, and we need to ensure productive industries have access to fill skill shortages.

The Government is also introducing a one-off "pathway to residence" for about 4000 long-term temporary migrant workers in the South Island, such those in the meat or dairy industry, and their families. Would this also include other South Island industries?

These workers have filled genuine shortages and their families have become well settled in the South Island, but are they going to become residents under the new rules?

Will they be covered as migrants who meet the criteria and get "work to residence" temporary visas, making them eligible for residency after two more years, as long as they stay in the same industry and region?

## 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.

Workers would also have a limit of working for three years in NZ on temporary visas, followed by a minimum stand-down period before they could apply again. It takes some workers up to three years to become skilled, which is when they would have to leave NZ under the new policy.

“Why do we have to kick these workers out, and start the pressure/cost of training all over again?”

### *Proposal 2b: Introduction of stand down period for lower-skilled Essential Skills migrants*

Consider the option for a year-long stand down period following the maximum duration for lower-skilled Essential Skills visas.

What impacts or implications do you foresee from these proposed changes?

Give details of the occupations and industries you are thinking of.

It takes some workers up to three years to become skilled, at which time they would have to leave NZ under the new policy.

“Why do we have to kick these workers out, and start the pressure/cost of training all over again?”

This will result in major costs and loss of production for Manufacturers employing these workers.

*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.

---

This will make it virtually impossible for Migrants with young families to move to New Zealand, as both parents would have to work full time.

*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.

---

This needs to be more specific, do pre-school and school age children require visas?  
If they are dependent children I think that they should be able to enter under their parents visa.

### **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.

N/A – we do not employ Seasonal workers

Consider the list of seasonal occupations being considered.

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

N/A – we do not employ Seasonal workers

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)?

N/A – we do not employ Seasonal workers