

9(2)(a)

From: s 9(2)(a), s 9(2)(g)(i)
Sent: Saturday, 20 May 2017 2:04 p.m.
To: ESConsultation
Subject: Culverden Community Dairy Farm Submission on proposed changes to immigration policy
Attachments: signatures immigration.pdf; immigration changes (1).docx

To Whom it may concern,

As a group of dairy farmers based in the Amuri Basin, North Canterbury, please find our attached submission on the proposed immigration changes to work visas announced in April.

Under the proposal we feel our business's ability to operate and our rural communities will be adversely affected.

The particular areas that will impact us are:

- Work Visas will have a maximum duration of three years followed by a one year stand down period.
- Visa holders will be unable to bring family to New Zealand (affecting 50+ children enrolled in our local Area school, from a total of 260 currently enrolled students).
- Dairy workers will be viewed as seasonal workers and their visa will only be valid for the duration of a season.
- There is no pathway to residence for visa holders.

As a community, we feel these changes are in response to issues in main centres such as Auckland around population and housing and regional NZ will be an unintended casualty of these issues and can easily be avoided by placing the following positions on the long term skills shortage list, allowing the applicants to work towards residency, providing us with a stable workforce and community.

- Farm Manager – 121313, ANZSCO level 1
- Assistant Manager – 121313, ANZSCO level 1
- Herd Manager – 841512, ANZSCO level 5

More detail is provided in the attached submission and is accompanied by signatures of local farmers with detail of the herd sizes on farm as well as the number of competent and highly endorsed staff currently on each property who would be directly affected by the proposed changes.

We appreciate your consideration of our submission and are happy to provide any additional information you may require whilst considering our submission.

Thank you for your consideration and kind regards,

s 9(2)(g)(i) on behalf of the Amuri Basin Dairy Community

As a dairy farmer in North Canterbury I have major concerns regarding the impact of the recently proposed changes around work visas and migrant staff. The issues affecting my business and community are outlined in the submission below referring back to the relevant consultation questions.

I feel that these issues are an unintended consequence of a policy change to address issues outside of my region and industry and could be fixed by listing the following roles on the Long Term Skills Shortage List:

Farm Manager – 121313, ANZSCO level 1

Assistant Manager – 121313, ANZSCO level 1

Herd Manager – 841512, ANZSCO level 5

Recognising these roles as genuine skill shortages in our region and industry would avoid the unintended consequences of the proposed changes allowing for a stable workforce and the continued prosperities of our businesses and communities.

Consultation questions: Proposal 2a

- What impacts or implications do you foresee from the proposed maximum duration of three years for lower-skilled Essential Skills visa holders? And why?
- Where possible provide information about the impact on specific occupations or sectors.

Submission Statement 1:

In the past 20 years, milking cow numbers in North Canterbury have almost tripled and productivity per cow has increased by 32%. This has resulted in a steady increased requirement for experienced and highly skilled staff to maintain our level of production and meet best practice compliance requirements in regards to environmental, animal welfare and hygiene standards for MPI exportation requirements. This rate is above natural population growth and therefore recruitment ability in our region.

Regional NZ * has a population and migration problem. The problem is that during the last 20 years the number of milking cows has increased from 3 million to 5 million whilst the populations in these areas have either remained stagnant or decreased.

In regards to North Canterbury, the labour requirement is larger than the local population can provide driving the need for labour to immigrate from within and outside New Zealand to our location. In the past, large stations covered the landscape with much fewer staff required than dairy farming, but affordable opportunities, improved farming practices, irrigation schemes etc. have resulted in land use changes to dairy conversions. The local population was never going to be sufficient to provide a labour force to support the industry growth. With limited population in regional NZ, we have relied heavily on migrant labor that are now highly skilled in quite significant numbers.

* (Regional NZ is defined as all areas outside of Auckland, Hamilton, Tauranga, Wellington and Christchurch)

- Between 1998 and 2016 New Zealand gained 1,708,492 more milking cows. For those of us in the South Island the growth rates of cows are as set out below.*
 - 405,000 Southland - 238% growth
 - 150,000 in Otago - 132% growth
 - 192,000 in South Canterbury - 389% growth
 - 513,000 in North Canterbury - 289% growth
 - 78,000 in West Coast - 102% growth

*Dairy Cow Population data sourced from LIC and Dairy NZ, along with Human population data from Statistics NZ, numbers in more detail here - <http://ccrecruitment.co.nz/our-cows-need-more-people/>

Submission Statement 2:

If there were suitable New Zealanders available in the location of my dairy farm with some life experience (22 years +) I would be eager to employ them with the only requirement being a drug and alcohol pre-employment test pass to meet the Health and Safety Act employer obligations. Currently, these people are not in the region and are unwilling to relocate from urban areas of oversupply to rural areas. The notion of "incentivizing" beneficiaries to go from unemployment to dairy farming and living some distance from their friends and families has not been successful as even with the opportunity of a work and income government relocation grant of over \$8,000 has not resulted in an increase of applicants.

If young eager students and school leavers were available in North Canterbury there are many farmers who would be happy to provide work experience on a short-term basis to provide them with the knowledge and skills to continue in the dairy industry such as through 'Gateway' etc. but the number of interested students is very limited.

It can be difficult to provide the pastoral care that young people require given the remote location and distance from friends/family and the practical support required for health and wellbeing given the physical nature of the work. Currently there is limited access to government departments to support these needs in regional areas and it becomes the employer's responsibility to provide meals, liaise with parents, take employees to appointments (medical etc.), encourage them to join sporting teams with other young people in the community and to give them the support they need. There was an initiative some years ago by MSD to provide some funding to farmers to take on young students with varying results.

Beneficiaries and students come to farming with no or limited skills and experience. Even if they were available and applying for positions they would not address the current shortage as the ANZCO definition of the role they would be filling requires 4-5 years experience and a level 3 or higher qualification indicating a long-term skill shortage longer than the current three-year work visa many migrant staff are employed on. I would only be able to justify such a risk of hiring a local school leaver or beneficiary if their success or failure would not dictate the success or failure of my business.

Submission Statement 3:

Despite the numbers of work visa holders already working in the NZ Dairy Sector, I believe the industry to have significant labor shortage issues. In North Canterbury, it is standard for managers and many employers to run recruitment programmes and not receive any suitable New Zealand applicants. Even using government programmes such as the Canterbury Skills Hub and WINZ in conjunction with traditional methods such as advertising through Student Job Search, newspapers and online systems such as the Fonterra web sites and seek.co.nz does not provide a suitable pool of NZ applicants to successfully recruit from.

For someone who has not been in recent full time employment it will be difficult for them meet the requirements of the job. This in turn will put pressure on senior members of the team including owners/sharemilkers/managers who will have to work additional hours putting their health and safety at risk, impacting on the workplace, their personal lives and productivity. In addition, if farmers/senior management will have to provide extra support to these under-skilled staff all other staff would need to be at a higher level of experience to provide this support.

An employer that owns several farms locally has in the last 12 months, across junior and middle positions (Farm Assistant through to Herd Manager) received 56 applicants, of which one was a New Zealander that consequently took up another position elsewhere in New Zealand. If I had a vacancy on my farm tomorrow, I am confident that no New Zealanders would apply and I would have to go through the visa process. Currently, to fill two vacancies in North Canterbury that have been open for over two months, they have had to recruit migrant staff that were already in the dairy industry.

Consultation questions: Proposal 2b

- What impacts or implications do you foresee from the proposal to introduce a stand down period for lower-skilled Essential Skills migrants? And why?
- Where possible provide information about the impact on specific occupations or sectors.

Submission Statement 6:

Currently attracting people with 4-5 years experience plus level 4 qualifications or higher is difficult due to a genuine shortage. By removing the capacity provided by immigrant staff it will exacerbate the shortage as by the ANSCO definition it will take 4-5 years to build the required skill level. Dairy farming is a business heavily reliant on attentive and skilled staff to effectively manage stock, pasture, crops, water and effluent and students/beneficiaries would require a large investment in time and training before they would be able to provide this level of skill, assuming there are not additional learning, attitudinal or health issues that would prevent them from learning and progressing in the industry.

Staff who can diagnose and treat illness in animals operating from a prescription from a vet, monitor and allocate pasture, operate heavy machinery safely and competently including million dollar cowsheds and effluent systems and induct and supervise junior staff members

are deemed low skill under the current classification yet the penalties associated with effluent, animal welfare and health and safety breaches can run into hundreds of thousands of dollars indicating that the judicial system deems them to be major areas of responsibility.

To comply with annual leave and holiday requirements, a farm manager is entitled to approximately 137 days off a year (5 on 2 off roster plus annual leave plus stat days) this has an on-farm requirement for a competent person to be able to take responsibility for these duties in the manager's absence. The current regime leaves the dairy industry without an assistant manager or senior herd manager to cover this period leaving legal employment responsibility requirements incomplete.

Submission Statement 7:

By placing staff who are on work visas in a position where they are required to stand down every three years it will remove people who have had the time and training spent on them to cover time off for management and will disrupt the day to day operation of dairy farms and their ability to meet their legal requirements. There should be no stand down of trained and experienced staff in the dairy sector, for the reasons outlined above.

Making qualified staff exit in areas of extreme labor shortages is jeopardizing the health and safety viability of dairy farms, creating competing legislation between Immigration laws and the current Health and Safety at work Act 2015.

Making trained and skilled staff exit the country and industry will see the dairy industry fail to meet targets and result in a drop in exports. The impact for my business and the dairy sector will be catastrophic. In addition, when these staff leave in 3 years time there will not be the number of New Zealanders required to fill these vacancies. Any New Zealanders coming into the industry will not have the support of experienced staff to help them learn and gain vital knowledge to progress in the industry.

Consultation question: Proposal 3

- What impacts or implications do you foresee from the proposal to remove the ability for lower-skilled Essential Skills visa holders to bring their partners to New Zealand for the length of their Essential Skills visa? And why?

Consultation question: Proposal 4

- What impacts or implications do you foresee from the proposal to remove the ability for lower-skilled Essential Skills visa holders to bring their children to New Zealand for the length of their Essential Skills visa? And why?

Submission Statement 8:

Removing the ability to bring family over to reside in their place of work reduces the incentive for foreign staff to invest and integrate into their community.

If farming communities are missing the families of their staff, schools and health facilities will suffer leaving rural children in empty classrooms. The children of temporary work visa holders on dairy farms are going to rural schools, where populations are stagnant or decreasing as the previously cited data evidences. These children play a part in ensuring rural NZ towns do not die off. Declining roles and struggling schools also affect the ability of dairy farms to recruit staff from within New Zealand as the quality of local schooling is a priority for families when considering moving to a new location.

Children of visa holders are not an undue burden on the education system due to restrictions of being allowed to remain in NZ as a dependent on their partner's visa only until the end of high school. Any student studying at primary or high school in rural NZ while their parents are providing a valuable contribution to the local economy should not be charged international student fees.

Having partners and children living with dairy farm staff makes the staff happier and more productive. The current "open" work visa status of the partner performs a valuable role in part time dairy farm work, aged health care in rural NZ, retail, cleaning/maintenance, and seasonal industries such as the freezing works and viticulture. The partners of dairy farm work visa holders provide substance and value to rural NZ. Many of our small tourism towns rely heavily on migrant partners to work in motels, restaurants, shops etc and many farmers rely heavily on wives during calving and mating periods and to cover leave of staff.

Life is good on a dairy farm, and the value of a remuneration package which includes a house allows work visa holders to have their families join them on farm. This illustrates the dairy sector should not be viewed as under paying our staff. City based work visa holders paying hundreds of dollars per week to share a bedroom will struggle to have their families join them; however, the dairy industry should be commended for providing such good lives to their work visa employees that they can afford to bring their families here. In addition, in small rural communities the partners of workers help build a sense of community. There is a risk with not having partners and family come out that there is no sense of community and large groups of mostly men are left. To relieve boredom, they usually find ways to pass the time that are less community focused and may start to impact on the wider community.

Consultation questions: Proposal 1

- What impacts or implications do you foresee from defining lower-, mid- and higher-skilled Essential Skills migrants in this way? And why?
- Where possible provide information about the impact on specific occupations or sectors.

Submission Statement 9:

I would like to grow my farm and business, in line with the Ministry of Primary Industries' goal of doubling primary industry exports by 2025 - <https://www.mpi.govt.nz/about-mpi/our-strategy-2030-growing-and-protecting-new-zealand/the-export-goal/> . However, these proposed visa changes place limitations on my ability to improve my farming efficiencies. As I would lose those staff that have spent 3 years now in the industry with significant skills and experience required to assist me to produce at the levels required in this strategy.

I find it confusing that one government department wants us to double our exports, and another government department is proposing labor restrictions and/or a compulsion for staff to leave NZ once I have them trained. We have found that even for motivated migrant staff progressing at an average rate, it takes 2 years to become a valuably skilled contributing team member. The total cost of recruitment and induction can be close to a year's annual salary according to many HR experts and we as employers would support that given the time taken to recruit, reference check, sort visas, provide on job training and external training, without including any additional support provided to help staff (NZ or migrant) fit into the local community.

Submission Statement 10:

The current ANZSCO system of classifying the roles and skills of dairy farm staff under

- ANZSCO 841512 – skill level 5, no experience necessary, or
- ANZSCO 121313 – skill level 1, managing the farm, paying the taxes and having no one “above” the work visa holder on the farm on a day to day basis.

is an outdated system, which has little to no grasp on the realities of the skills or roles of ‘dairy farm worker’ 841512 and ‘farm manager’ 121313. We propose a middle level with those of 2 years + that are similar to a diesel mechanic - a skilled position that does everything 121313 does, with the exception of managing budgets and tax. The staff that meet this criteria are accountable when the Farm Manager or Herd Manager is on rostered days off and annual leave. This staff member will typically hold at least one level 3 AgITO

course with 2+ years dairying experience in NZ. It would be logical to redefine the roles and skillsets of staff who work on dairy farms in NZ, as neither ANZSCO 841512 or 121313 are effective for classifying the skills our staff have, what our staff do, and what we require them to do.

Submission Statement 11:

Considering statement 10, if there is an unwillingness to redefine ANZSCO and the next Immediate skills shortage list (ISSL) review, we request this current submission is put forward as advocacy that mid-level dairy farming positions are placed back on the Immediate skills shortage list. We would also like to advocate for them to go on to the Long Term Skills Shortage List as Farm Manager, 2IC or Assistant Farm Manager. These are skills that the industry needs and if we don't keep these people in New Zealand in the future, there will be a huge skills gap resulting in farmers being unable to be productive and run the business as it should be run as there will only be junior or senior staff on farm. Many of us experienced this when we first brought migrants to New Zealand. The labour market was very tight in all sectors but significantly in dairying given the growth in cow numbers and lack of growth in rural NZ populations. There are a number of farms that since we have had migrant labour stability, have been able to significantly boost production and productivity with no other major changes to our operations.

Submission Statement 12:

I submit that the position of Herd Manager should be defined as 3 years NZ dairy farming experience and a NZ salary of \$60,000 per annum. I would like this also to be placed on the LSSL to provide certainty and stability for dairying and for those migrants currently working in the dairy industry.

Submission Statement 13:

The below MBIE cited proposal to classify any worker on ANZSCO skill level 4 or 5 (unskilled), regardless of their salary is highly misguided and wrong, particularly in consideration of the fact that the vast majority of current dairy farm work visa applications are compelled to be classified under ANZSCO 841512, skill level 5.

Proposed Essential Skills skill levels and associated visa conditions					
Skill level	Remuneration thresholds		ANZSCO	Visa length	Children & partners
Higher-skilled	\$35.24+ per hour	And	1/2/3/4/5 ⁶	Up to 5 years	Yes
Mid-skilled	\$23.49 - \$35.24 per hour	And	1/2/3	Up to 3 years	Yes
Lower-skilled	\$15.75 ⁷ - \$23.49 per hour	And	1/2/3	Up to 1 year	No
	\$15.75 - \$35.24 per hour	And	4 & 5		

At this point, we will move onto answering the questions the government specifically asks of their proposed changes:

The implications of defining "lower" skilled migrants in this way would be devastating to my business and my community who are reliant on work visa holders. To address this there needs to be a system change which no longer classifies dairy staff as unskilled, or recognizes them as skilled, no matter what their ANZSCO classification is, once they reach a certain earning threshold.

The proposed changes show a lack of understanding of the dairy sector's realities, compounding the ineffective nature of ANZSCO, and providing no recognition for NZ attained experience or salary thresholds.

The dairy sector has made huge progress in keeping timesheets, reducing working hours, providing better rosters etc. However, a working week on a dairy farm can still approach 50 hours per week. In consideration of this, some flexibility around hours within a remuneration band should be provided. We now feel we are being penalized for adhering to best practice. It is 2017, everyone has a smart phone. I find it hard to believe people in mid to senior level roles in the corporate world, on \$60,000 or more per annum, are only working 40 hours a week given the nature of smart phones and how work tends to follow any busy professional home. I find it inequitable that because the dairy sector now keep timesheets and are transparent about a working week sometimes constituting slightly more than 40 hours per week, we are penalized for this.

Whilst dairy farms can be audited at any time to show they are keeping timesheets, many other professionals (accounts staff, administrators, government staff etc.) have peaks of work (year end, month end, budget announcements, policy deadlines) where they work beyond their contracted hours and it is accepted that their 40 hour a week contract is a

guide and that they can be/are required to go beyond this to meet business needs as per clauses in their IEA or collective agreement.

In contrast to the senior level corporate on \$60,000 per annum often working over their contracted 40 hours per week expenses out of net wages are significantly more than their rural counterpart.

For example, on \$60,000 living in Wellington:

\$60,000

\$2307 (gross pay) – (tax) 455.38 = \$1851.62

\$1,851.62 - \$24.80 (20 trips on bus) - \$600 rent (assume married, no children central 2 bed flat) - \$75 (power, internet etc.) = \$1,151.82

\$1,151.82 – to provide clothing for work (\$45 fortnight)

\$1111.82 (left for savings, phone, entertainment, food etc. per fortnight)

Total package of Herd Manager

\$55,000 (Total Value Package) assuming \$150 rent independent accommodation

\$2,115.38 - \$395.12 (tax) - \$300 rent + 30 non-taxable clothing allowance = \$1435.26

\$1,435.26 (some employers pay power/internet) if not, \$1,435.26- \$90

\$1,345.26 (left for savings, phone, entertainment, food etc. per fortnight)

In addition, farm staff are generally provided free firewood and cheap meat

We suggest a 4 tier system over the proposed 3 tier system, which allows the employee who is new to NZ, 3 years to establish themselves, and move to the semi skilled tier or be required to leave NZ. We would also ask that they be allowed to bring out partners and families after one year with the clear proviso that should they not move up to the semi skilled tier they will have to return home.

Proposal to align with the realities of any mid to senior role in any profession

Suggested thresholds that align with the dairy sector's reality	Hourly rate of Pay – top ups when the working week or fortnight exceeds 100 hours	Annual rate of pay 100 hour fortnight, and or 2600 hour working year	Comments	Visa length	Children & Partners
Remuneration threshold below which an Essential Skills visa holder would be lower-skilled	Min wage - \$18.79	Min wage -\$48,859 per annum	Allowing a NZ new employee 3 years to learn the role, system and culture, while attaining NZ based experience and perhaps qualifications with family allowed after <u>1 year</u>	1 year renewable, max 3 years, before stand down period	No

Remuneration threshold above which an Essential Skills visa holder would be semi-skilled	\$18.80 to \$23.49 per hour	\$48,880 to \$61,074 per annum	Recognition the employee has moved into the semi skilled remuneration band and subject to labor market testing is performing a role for which local staff cannot be attained. <u>Family invited too.</u>	1 to 3 years, salary and regional dependent	Yes
Remuneration threshold above which an Essential Skills visa holder would be higher-skilled	\$23.50 to \$35.24 per hour	\$61,100 to \$91,624 per annum	At which time it is suggested a small number of additional SMC points are granted, on the basis of a higher skilled employee <u>and that these roles do not put pressure on main centres</u>	3 to 5 years, salary and regional dependent, with SMC eligibility	Yes
Remuneration threshold above which an Essential Skills visa holder would be Elite - skilled	\$35.25 per hour or higher	\$91,650 or higher	At which time it is suggested additional SMC points are granted, on the basis of an Elite skill being self evident when that level of remuneration is earned	3 to 5 years, salary and regional dependent, with SMC Residence qualification being highly likely	Yes

Making trained staff exit who are working in skilled areas of dairy farming and the continued evidenced shortages will see the dairy industry fail to meet targets and result in export decline. The impact for my business, the dairy sector and ultimately the NZ economy would be catastrophic. In addition, when these staff leave in 3 years time there will not be the number of New Zealanders required to fill these vacancies. Any New Zealanders coming into the industry will not have the support of experienced staff to help them learn and gain vital knowledge to progress in the industry.

A maximum age of 55 (as is the case for residence via SMC) for a temporary working visa would provide a limitation, as the current proposal of the government would appear to desire.

Given that NZ's pasture based farming system is unique compared to any other in the world, once we have trained work visa holders, which takes 1 to 2 years, we ought be allowed to retain them in our business or industry for at least a further 5 years providing that the current local shortages continue. In addition, as a country that values labour by having the Employment Relations Act, we need to look after staff wellbeing both inside and outside the

workplace and allowing family to come out would show how they are a valued part of our community and country.

Consultation questions: Proposal 5

- What impacts or implications do you foresee from the proposal to reinforce that Essential Skills visas for seasonal work are only granted for the length of the season and that the offer of employment must match the length of the season? And why?
- Are there any seasonal occupations that should be added or removed from this list? Why?
- If you employ seasonal staff, or represent a sector with seasonal staff:
 - What are the occupations of the seasonal staff 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)?

Proposal 5: Make it explicit how the 'period of employment' condition applies to seasonal work

Cabinet has agreed, in principle, that Immigration Instructions would be explicit that for Essential Skills workers in seasonal occupations, the offer of employment (and as a result the duration of the visa) must not be longer than the length of the season. Workers would need to leave New Zealand in the off-season but could return the following year provided that they continue to meet the labour market test.

While Dairy Farming is seasonal in nature it is not a seasonal job. Management and staff have responsibilities in a year-round calendar of operations unlike a true "seasonal job" like harvesting fruit.

While cows "dry off" for a short period each year, the work on the farm including but not limited to maintaining the cows, grass & the farm itself is a year around job. Following a period of lower milk payout farmers focused on reducing operating costs which has resulted in most farms having cows wintering on farm which is still full time work (30+ hours a week). Also, this is a time for staff or management/owners to take their annual leave. Dairy Farming should be removed from the "seasonal occupations list". The roles on a dairy farm are all year round, the "peak" of the season occurs during spring calving, when the number of animals on farm doubles with each cow giving birth. This occurs between July and October on most farms. Mating takes place from October-December which involves finding cows on heat daily. January-March has a focus on feed and irrigation with staff taking some time off. April-May is dry off. June-July is wintering and "Dry cows" (non-producing animals) still require feeding and observation for ill health. Many practices such as mating extend from one year into the next i.e a successful mating period on farm requires that the

work begins in the previous farming year to result in a successful pregnancy, calving and subsequent lactation. Likewise, the successful rearing of a calf to a high producing adult is a two year process.

Putting Dairy farming in a seasonal list would be equivalent to classifying accounting and taxation staff as seasonal because they have an annual deadline for completion of their work.

Lower skilled positions on farm can be seasonal in nature and may lend themselves to hiring a school leaver or beneficiary at a busy time of year, such as calving, if a suitable applicant were available but only if the rest of my team were established, stable and skilled enough to complete the ongoing nature of the dairy calendar of operations.

Closing Statements

The proposed changes are disturbing, and if implemented would damage our business, the dairy sector and community. The proposal shows a lack of understanding of the issues facing regional NZ and suggest that population and immigration problems which are present in the main cities, particularly Auckland, might be allowed to dictate policy around the rest of New Zealand, negatively affecting rural communities and the NZ economy.

Signed by: (Please see other attachment for signatures)

RELEASED UNDER THE OFFICIAL INFORMATION ACT 1982

As a dairy farmer in North Canterbury I have major concerns regarding the impact of the recently proposed changes around work visas and migrant staff. The issues affecting my business and community are out lined in the submission below refering back to the relevant consultation questions.

I feel that these issues are an unintended consequence of a policy change to address issues outside of my region and industry and could be fixed by listing the following roles on the Long Term Skills

Shortage List:

Farm Manager – 121313, ANZSCO level 1

Assistant Manager – 121313, ANZSCO level 1

Herd Manager – 841512, ANZSCO level 5

Recognising these roles as genuine skill shortages in our region and industry would avoid the unintended consequences of the proposed changes allowing for a stable workforce and the continued prosperities of our businesses and communities.

Name	Email	Cows milked	Staff affected
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INACT 1982

9(2)(a) 50 signatures in total in petition



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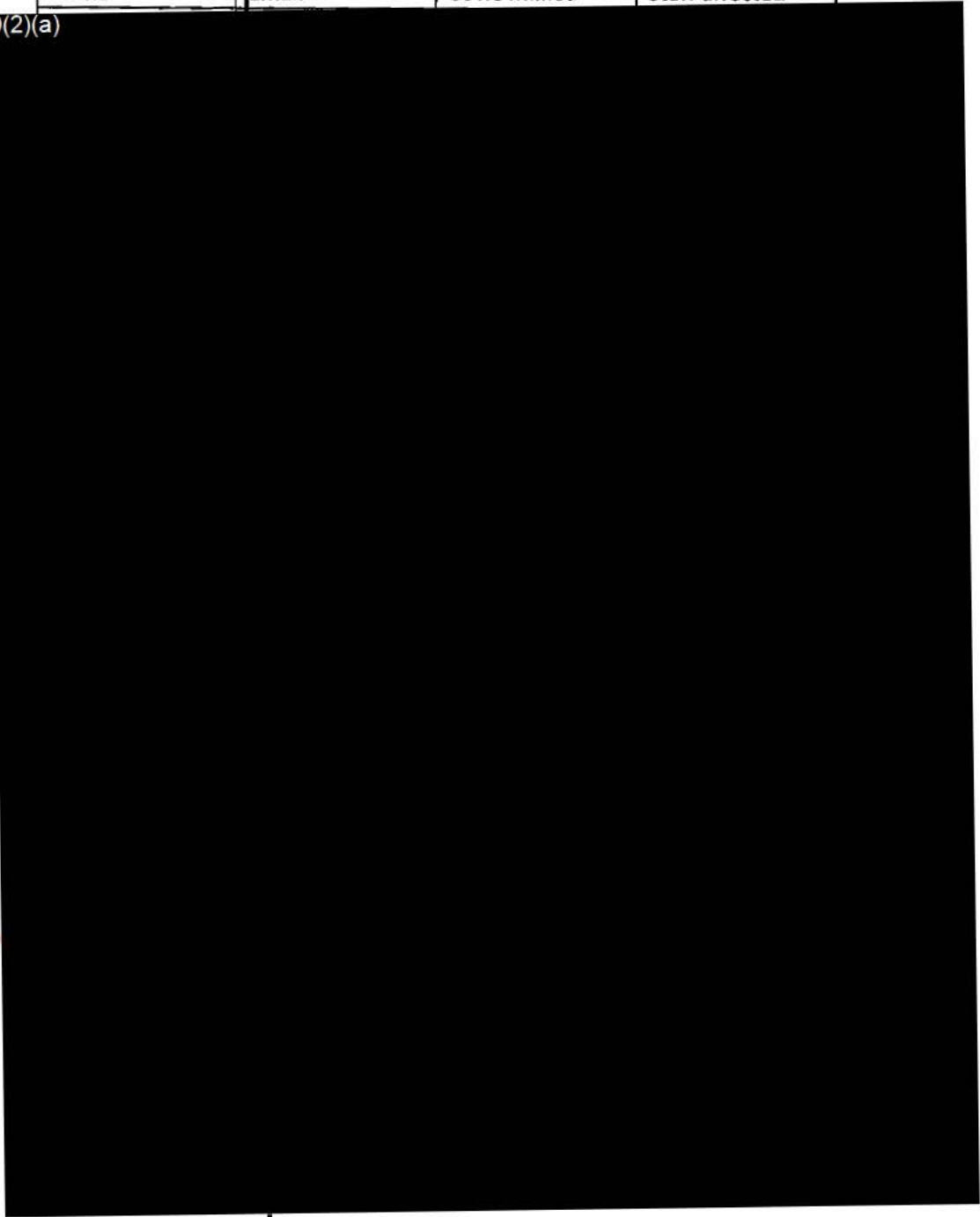
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RELEA

NACT 1982