

## 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:

Canterbury Business Association

Phone: 9(2)(a)

Mobile: 9(2)(a)

Email: 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.

Membership based migrant organisation

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

Canterbury Business Association (CBA)

What industry or industries does that group work in?

CBA: Business Advisory Services

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

CBA: Small business owners (retail, hospitality)

AMC: Dairy farm workers, hospitality

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.

CBA: Resident, essential skills, work-residence under both the long and short term skill shortage list. Often, we also help students with study visas for training.

AMC: Work visa skills, essential skills and long term skill shortage (low skilled)

**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)

--

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

--

## 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.

The implications of a salary test for measuring a person's skills alone are an inadequate way of determining a person's skill level. Creating a better sync for recognition of immigrants skills so there is parity with NZQA qualifications recognition upon entry is perhaps a better approach. A great many migrants qualification have not been recognised by industry. The result has been many highly skilled migrants ending up in low skilled jobs where locals perceive that those jobs are no longer available to them, even if the debate is still on as to whether most of these locals in fact want these jobs, or require support to upskill. We need to give employers more assurance of people's qualifications at the point of granting visas perhaps by linking to an NZQA standard as part of the process to give more clarity to employers. So highly skilled migrants are not trapped in low paying jobs.

The recognition of higher qualifications can be done, as it is easily done already by universities for Bachelorettes; Masters and PhD qualification for students who come from around the globe and enter NZ universities based on qualifications from their home countries.



## 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.

This could work well, but considering the impact on stakeholders such as Farmers Federation who are big beneficiaries under this policy, we must consider two important points:

1. Frequent re hiring and the necessary compliance with immigration is an ongoing cost to them; and
2. There are instances unless it is merely seasonal work, where relationships are established with workers to the benefit of both parties, and for which re hiring is another cost on the business in retraining and lost knowledge – especially in respect to the stand-down period.

This also opens opportunities for more confusion with persons seeking to stay longer who should in any case be allowed to stay if their employment still meets their employer's needs. I think providing more certainty here for employers would increase confidence to invest in better conditions of employment perhaps even better methods/technology (as intended by government ) as employers will not expand more efforts towards retention of migrant staff.

### *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 see the impact as unfavourable because it impedes on the relationships employers build with their employees, a relationship of trust. It also creates uncertainty in the hiring process, not to mention the added costs involved in recruitment, including immigration visas.

### *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.

Without seeming to penalize the main visa applicant holder and the negative impacts on their employment if they are here term separated and unable to bring their family should such a partner not qualify would be a negative. The focus should be on making them aware of the limitations of bringing their family, so they don't have false expectations.

The Domestic Staff of a Diplomat Work Visa, and the Au Pair (Nanny) Visa are good examples of handling this type of visa. We like the clarity it provides in terms of tenure, requirements and criteria.

We do not think the youth and the long-term unemployed is a basis of this proposal. These issues are complex on their own, and require a separate discussion document.

*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 feel there is a need for this. But Once again focusing on expressing the limits of the visa in respect to ones family upfront gives them opportunity to make an informed decision at the start. the visas should be time limited for a period manageable for a worker to be without family for their period of employment perhaps with travel rights.



## 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.

The reinforcement of the essential skills visa is a step in the right direction especially by way of clear definition of its terms and requirements and tenure. This should be applied especially to seasonal worker industries. These terms need to be defined in with consultation and taking into account the requirements of the industry as to the length of their tenure.

Consider the list of seasonal occupations being considered.

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

The list is comprehensive, but we need consultation directly to industries and to hear from regions which are directly impacted by this.

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)?

These questions are great to pass onto the industry. We would love some feedback from the Timaru & Bay of Plenty/ Tauranga Chamber of Commerce which is growing in seasonal workers.