

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), s 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.

I am a NZ Licensed Immigration Adviser with 28 years experience assisting migrants move to NZ.

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

I am representing my company Tri-Nations Migration (Pty) Limited.

What industry or industries does that group work in?

All industries.

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

All skilled occupations.

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 and Work-to-Residence work visa leading to residence under Skilled Migrant Category Instructions.

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)

N.A.

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.

First off, I do not understand why I can only make submissions for temporary visas and not for SMC visas. I hope I will be given the opportunity to do so. My comments below relate to the Essential Skills visa but may equally be applied to the remuneration thresholds for the Skilled Migrant Category.

Point 1. An occupation is either skilled or it is not. A skilled occupation is determined by the qualification and/or experience requirement and not by remuneration level. Immigration New Zealand already apply a market salary related test to all skilled occupations. It is not acceptable to determine if a position is skilled or not based on the median salary for all occupations in NZ.

Point 2. If you wish to raise the bar for skilled migration by dropping the market related salary criteria, then use the median salary criteria for that 'particular occupation' by checking on www.Payscale.com/nz. The median salary is highlighted for all occupations and may be easily checked. This will enable skilled occupations which are paid a median salary below the average median salary for all occupations (as proposed by INZ) to still attract and recruit skilled migrants to NZ in all industries e.g. hospitality industry which has a median salary for a Restaurant Manager of \$39,624.00 per annum based on a 40 hour week. For all other occupations paying a median salary above the national average i.e. \$48,859.00 per annum, I propose that the figure of \$48,859.00 be used as the minimum benchmark for all skilled migrants.

Point 3. The national median salary takes no cognisance of a company's geographical location or the size of the company. These are key considerations when employing people in Auckland or Invercargill. It is wrong to apply the national median salary to all positions of skilled occupations.

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.

Lower-skilled positions should be defined by the nature of the occupation and not the salary.

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.

This does not impact on my business which is dealing with skilled migrants seeking to apply for permanent residence in NZ.

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.

N.A.

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

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

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

Holders of lower-skilled Essential skills visas will not be able to afford to pay for their children's education in NZ.

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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.

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.

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.