



Proposed Changes to the Essential Skills Visa – Submission Document



Presented by: Douglas Pharmaceuticals / Manufacturing Ltd
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About Douglas Pharmaceutical Manufacturing

- Douglas Pharmaceuticals in Henderson, Auckland is a New Zealand success story – a rapidly-expanding pharmaceutical company with a reputation for high manufacturing standards, high-quality healthcare products and outstanding client service.
- A key cornerstone of our business includes Contract Manufacturing and Analytical Services for several multinational pharmaceutical companies as well as small generic companies. We specialize in end-to-end contract services from product development through to commercialization, providing products and services tailored to our customer's specific needs.
- We are a family owned business and our organisational culture is based on a "people first" philosophy and we have significant plans in place for future growth.

- We employ 450+ staff of which 18 full-time permanent employees are migrant workers with visa's most commonly in the *Essential Skills* and the *Work to Residence* visa categories.
- These employees are in the following occupations at Douglas:
 - Chemical Operators – Manufacturing and Packing;
 - Laboratory Analysts – Quality Control;
 - Validation Officers – Quality Control;
 - Research & Development Scientists – New Product Development.
 - Toolmaker / Welder – Engineering;
 - Occupational Hygienist – Technical Services;
 - Sales Manager – Medical Sales.

About our Immigration Challenges

- Our Chemical Operators is a “high risk” category and we currently seeking to recruit 11 Chemical Operators due to expansion of our pharmaceutical manufacturing operations.
- Chemical Operators in the Pharmaceutical industry is classified as ANZSCO Skill Level 3 (Mid Skilled). Immigration NZ recently challenged the above classification and indicated our Chemical Operators fit the Skill Level 5 ANZSCO classification (Low skill) and declined one of our Chemical Operators’ work visa application under Essential Skills Visa category.
- Due to the “Labour Market Test” requirement by Immigration NZ, we requested WINZ to advertise and provide us with suitable candidates. WINZ provided us with a Skills Match report which indicates our Chemical Operators is indeed a Skill Level 3 under the ANZSCO classification.
- WINZ also confirmed this is a “hard to fill” role and has withdrawn their advertising as they could not find candidates from the local market.

Proposal 1 - What impacts or implications do you foresee from defining lower-, mid- and higher-skilled Essential Skills migrants in this way?

- The application of the Essential Skills threshold will indicate the level of skill for the occupation eg. Low skilled, Mid skilled or Skilled.
- However, this approach of aligning the remuneration thresholds for the Essential Skills visa with the remuneration thresholds for the Skilled Migrant Category is entirely focussed on *immediate earnings* and there is no consideration for **skill based pay systems** which recognise skill acquisition over time.
- An entry level Chemical Operator must have transferrable skills with experience in the Pharma / Food Manufacturing industry.

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Douglas Manufacturing Skills Matrix for Pharmaceutical Manufacturing operations.

- Douglas Manufacturing's approach to ongoing development and training of staff follows a skills and competency matrix approach whereby staff receive training on theoretical and practical basis under supervision and are then assessed as to their competency during normal operations.
- We have adopted a six month review process to ensure staff competencies are regularly reviewed and changes in competencies and acquisition of new skills are recognized via incremental increases to the employee's base rate.
- Skills Matrix training is an ongoing process for our people in production departments.

Level	Competency
1	Not Yet Competent
2	Competent
3	Proficient
4	Expert

Skills Matrix Training

• GMP Training (Good Manufacturing Practice s)	
• Manufacturing Skills	
	Core Manufacturing Skills – documentation, in process checks
	Powder Blending
	Tablet Coating
	Tablet Compression
	Creams Manufacture
	Material Dispensing
	Soft Gelatin Capsule Manufacture
	Low Shear Granulation
	Hard Gel Encapsulation
	Hi Shear Non. Containment Granulation
	High Shear Cont. Granulation
	Liquids Manufacture
	Medicine Fill Preparation
	Tablet Polishing
	Capsule Printing/Polishing
	SAP Transactions
	Steroid Liquids manufacture
	Washbay Operation
	Authorised Person
	Controlled Drug Handling
	National Certificate in Manufacturing (Core Skills) - externally assessed

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Proposal 2a: What impacts or implications do you foresee from the proposed maximum duration for lower- skilled Essential Skills visa holders?

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

- Skills Matrix training is an ongoing process with a training and development path of between two to five years for the Chemical Operator before they reach “proficient” level in more than one competency.
- Investment in our Skills Matrix training and development process will be lost or reduced by the proposed maximum duration for Essential Skills visa holders.
- Furthermore, in the unlikely event the migrant worker returns to New Zealand at the end of a 12 month stand-down period, re-training on our Skills Matrix must occur due to the non-exposure to our GMP processes and SOP’s in the Pharmaceutical Manufacturing industry, which is highly regulated by compliance.

Proposal 3: What impacts/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?

Proposal 4: Require the children of lower-skilled Essential Skills visa holders to meet the requirements for a visa in their own right

- Douglas is a family oriented organisation. The emotional and physical well-being of our people forms an integral part of what makes Douglas an employer of choice.
- This proposal raises the following concerns:
 - Living quality of our people. Migrant workers will not only provide for their own cost of living in New Zealand, but will also provide financial support to offshore families.
 - Social impact on split families.

Thank You!

- We would like to thank the **Ministry of Business, Innovation and Employment** in conjunction with **Immigration New Zealand** for considering our submission to the proposed changes to the Essential Skills Visa.
- Your continuing support is vital to the success of New Zealand Industries.

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