

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.

On behalf of our Company.

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

Gardon Limited.

What industry or industries does that group work in?

Dairy Farming.

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

Farm Managers, Assistant Managers, Herd Managers and Farm Assistants.

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 visa, Study visa, Essential Skills work visa and Open 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)

More than 30 miagrant workers.

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.

Gardon Limited supports the Federated Farmers position to use salary to help determine skill level because the ANZSCO framework is not accurate for the dairy industry. However, we believe that skill level 4 & 5 workers should have access to the mid skill level, which would open up the opportunity of 3 year visas, by meeting the lower threshold. As an example, if a herd manager can be considered high skilled by meeting the higher salary threshold, surely they should be considered mid skilled if they meet the lower threshold.

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.

Gardon Limited supports the Federated Farmers position that migrants should be granted a visa based on whether there are New Zealanders available to fill the position. If the shortage in domestic labour is there, and is demonstrated through a labour market test then it is a needless cost to business for a migrant worker to have to leave New Zealand to be replaced by another migrant.

Our farms are based within 10 – 20 minutes from Taupo and we employ over 30 miagrant workers in our dairy farming business. We compete with Landcorp and other small and large farming businesses for a limited domestic labour supply.

Our farms are large scale, employing between 5-9 full time equivalent staff on each farm. We require our Farm Assistants and Herd Managers to share accomodation on farm as the capital required to build separate accomodation is not feasible or realistic. Whilst we provide a good standard of accomodation, the need to share accomodation detracts interest from domestic labour.

We have noticed there is a shortage of domestic labour for farming positions in the Central Plateau and traditionally we have been unsuccessful at attracting domestic labour to our dairy farming positions. This is despite advertising, participation in the local college careers evenings

and working with the Gateway programme.

For example, the last three advertisements for staff have drawn the following response:

17 April Farm Assistant - 4 applications. All applicants were based overseas.

26 April Herd Manager (Labour Market test) - 4 applications, 1 ex- staff member, the rest had no CV or unsuitable. Also 1 WINZ applicant - never returned calls.

12 May Herd Manager (Labour Market test) - 3 applications, 1 ex- staff member, the rest had no CV or unsuitable. Also 1 WINZ applicant - unsuitable due to criminal convictions.

Each year we employ 4-6 Indian students from the Toi Ohomai Institute (formerly Waiariki Institute), who work and study on our farms for 8 months. This helps us find entry level Farm Assistants and ensures all our staff have a base level of skills over time. The students study to achieve AgITO level 2 and 3 over this period and then go on in the second year to study toward AgITO level 4. Three of our existing Farm Managers have come through this programme.

Unfortunately the Toi Ohomai programme will not continue in 2018 and we are unsure how to find entry level staff in 2018 with the current domestic labour shortage and proposed restrictions to miagrant labour. For us to invest in the AgITO training for international students has been said to be approximately \$6,000 per student. This is uneconomic for a one year investment horizon for a miagrant with a one year visa.

We seek an immigration scheme where if an initial labour market test is done to establish a domestic labour shortage, an immigrant could be sponsored by an employer for a period of up to 3 years without further labour market tests or v sa renewals over this period. This would allow a reasonable time period for the employer to invest in training and development and encourage some stability of tenure for the immigrant to move to a higher skill level.

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.

Federated Farmers believes that whether a migrant should be granted a visa should be based on whether there are New Zealanders to fill the position. If the shortage in domestic labour is there, and is demonstrated through a labour market test than it is just a needless cost to business for a migrant worker to have to leave New Zealand to be replaced by another migrant.

Farm Assistants and Herd Managers gain valuable skills and work experience over time. Imposing a stand down period is only transferring more cost onto employers in terms of the "people cost" - lost productivity, recruitment, training and adminsitration.

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.

Gardon Limited supports the view of Federated Farmers that the family of migrant workers make important contributions to rural communities. Rather than put pressure on community resources, they provide the vital critical mass that many rural community groups, sports teams and schools need to be viable. This is especially relevant in rural and farming communities.

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

As above.

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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

<p>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.</p> <p>What impacts or implications do you foresee from these options?</p> <p>Give details of the occupations or sectors you think are likely to be affected.</p>
<p>Dairy farming work is not seasonal – it does follow the seasons but there is work to do through the whole year. While the workload will fluctuate seasonally there is sufficient work to keep Essential Skills migrant worker employed for the duration of the year meaning they will be offered permanent or one fixed term contracts.</p>
<p>Consider the list of seasonal occupations being considered.</p> <p>Are there any seasonal occupations that should be added or removed from this list? Why?</p>
<p>Dairy Farming should be removed from the list as the work is not seasonal as stated above. The skills and experience required span a whole year cycle and the best and most effective outcome is to get permanent staff that are experienced in the whole year cycle on farm.</p>
<p>Consider the list of seasonal occupations being considered.</p> <p>If you employ seasonal staff, or represent a sector with seasonal staff:</p> <ul style="list-style-type: none">• 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)?
<p>N/A</p>