

## 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:

§ 9(2)(g)(i), § 9(2)(a)

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████████████████████

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.

Own company

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

Concept Farms Ltd

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?

Dairy Farm workers

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

**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)

12

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.

Our concerns are that Dairy farm Assistant Herd Manager and Herd Managers have valuable skills and experience that are not being recognised by the proposal, they are deemed ANZSCO levels 4 and 5 and therefore remain lower-skilled and are unable to move into the mid-skilled category.

Assistant Herd Managers and Herd Managers have usually had over 2 years experience and have gained competency in a number of skills and tasks on our dairy farm through both internal and external training. This allows them to work competently and therefore safely without supervision. Assistant Herd Managers and Herd Managers have a wide range of skills and attributes that allow them to supervise and train junior staff and Dairy Farm Assistants. They also have the ability to run the farm for short periods of time while owners/managers have time off.

We invest time and money into training our employees so they can learn and grow in the industry. Without this level of competency in our business and potentially needing to replace individuals every 3 years it opens our business up to a number of risks. Having to replace a competent farm worker with another worker who has little to no understanding of our farming business exposes our business to health and safety and financial risks. It is also important that we are able to retain our Assistant Herd Managers and Herd Managers so that our managers and owners are able to have time off and know that the business is in capable hands.

Our concern is not in relation to the salary levels but the way ANZSCO has classified our employees.

## **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.

On our farm one of the biggest concerns is that we invest time and money into upskilling our employees into positions such as Assistant Herd Manager and Herd Manager, where they are competent and capable at completing tasks safely and independently and then be required to leave – our history over the previous 9 years has shown that in our area there have been no suitable NZ applicants therefore we are then required to recruit another migrant worker fresh to NZ and our farm. This is both a time consuming and costly process with recruitment agents and legal advice. Thus resulting in a migrant worker being employed with no understanding of our farm and systems exposing our business to both health and safety and financial risks.

We would like to see that our Assistant Herd Managers and Herd Manager be recognised as the skilled workers that they are; that they are eligible after 3 years of essential skills visas to continue employment within our business.

*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.

As above – It will have a negative impact on the dairy industry as it will become increasingly harder to recruit migrant workers if they know they are only eligible to work for 3 years, thus in turn will impact on employer's decisions to train staff both internally and externally knowing that after 3 years they will have to be replaced with another migrant worker.

*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.

We have concerns as this will limit migrant workers who will want to come to New Zealand, farmers who are passionate about the industry and their jobs want to learn and upskill themselves become involved in the business and community. It will become increasingly hard

to recruit migrant workers with these attributes if they know that after 3 years they will have to leave.

Many migrant workers have families that they leave behind to follow employment opportunities in New Zealand. Knowing that they can provide a stable income to support their families with the ambition that they will be able to bring their family to New Zealand to live in the future.

These families contribute to the local community in many ways including; attending the local schools, sports teams and joining community groups such as the School PTA and Plunket. The increase in migrant workers to the area has a positive impact on the local economy as more money is injected into the community providing more job opportunities for locals in areas such as retail, education and services.

We foresee that this will have a negative effect on the Dairy Industry employment opportunities, which in our area already has a major labour shortage. This in turn could result in hard working farming businesses to cease as farming operations are unable to operate without adequate employee numbers.

*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

## 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.

Seasonal variations impact the tasks that are required at certain times of the year, however we still require all 12 of our full time migrant employees to complete these tasks throughout the year. While in winter cows are not milked we still require all full-time employees as breaks need to be shifted and animals fed, along with maintenance and preparation for calving tasks to be completed.

Consider the list of seasonal occupations being considered.

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

Dairying as above

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)?

Dairy Farm Staff are permanent all year