

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)(ii), § 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.

9(2)(a)

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

Sanford Limited, and North Island Mussel Limited (NIML)

What industry or industries does that group work in?

Seafood including wild harvesting (fishing), farming (aquaculture) and land based processing.

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

Mussel openers, mussel graders & mussel packers; in future perhaps fishing crew

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.

Temporary work visa, essential skills work, work-to-residence

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)

NIML (300) 10% on temp work visa; Sanford Havelock (250) 20 on Essential skill visa

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

Yes; we have also been involved in requesting new skills be added to the critical shortage list

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.

This is difficult as does not reflect remuneration formulas that include bonus or share-of-catch. In seafood processing packers and graders would unlikely meet hourly rate \$23.49. Higher skilled mussel openers will. Processing plants are often located in rural communities where it is increasingly difficult to employ staff, without access to the essential skills visa we could not fill positions. Needs more flexibility.

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.

We are comfortable with changing the length of visa duration ONLY if it is possible to reapply prior to the visa expiring, or move to work-to-residence so there is continuity. Currently the government policy of 11 months for foreign fisher crews at all skill levels is inefficient - would be better if it was 3 years for officers, 18 months for crew. Difficult to find workers in South Island areas like Havelock, or willing to go to sea on fishing vessels.

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.

Stand downs are likely to mean that workers will not return as it's too disruptive on their lives & for the New Zealand business. Also does not allow for skills to be built up over time - or for worker awareness i.e. via Health and Safety procedures to be well understood. Continuous employment is preferred.

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.

Fishing crew who come into New Zealand under a work visa rarely bring their family. Seafood processors coming in under essential skills will bring their family - we do not support the requirement for these people to meet the visa rules. More flexibility is required, noting that we try to employ from within NZ but find increasing difficult in rural South Island.

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.

Disagree - this will make it difficult to attract workers at the lower-skill end.

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 wild harvest fishing industry is not seasonal, so would sit outside this requirement. Our seafood processing is often not seasonal. While NIML is open Oct.-July each year this is because of lack of product, we are working hard to grow continuous supply. Matching the visa to the duration of work will likely result in people not being willing to take up positions, noting that these positions are often at the lower end of the pay scale.

Consider the list of seasonal occupations being considered.

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

Not all seafood processing is seasonal, it should be removed from the list.

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)?

Unskilled work largely confined to processing roles including loading and grading.

Semi skilled work including packing, trimming, machine operators.

Skilled processing includes opening and knife hands with experience.