

A new approach to employer-assisted work visas and regional workforce planning

Submission form
December 2018



New Zealand Government

1. Submission form guidelines

Purpose

The Ministry of Business, Innovation and Employment (MBIE) is undertaking public consultation on behalf of the Government, regarding:

- Proposed changes to the employer-assisted temporary work visa system
- Early ideas on regional workforce planning and better alignment between the Immigration, Welfare and Skills/Education systems.

The consultation is open to all individuals, groups or organisations. There are some questions which must be answered for data collection purposes. Submitters may otherwise respond to the consultation questions as they prefer.

The consultation will commence on 18 December 2018 and conclude on 18 March 2019. Further information, including the full consultation document can be found [on the MBIE website](#).

Process

The consultation is open to all individuals, groups or organisations. Submitters must respond to the submitter questions marked with an asterix. All other questions are optional. Submitters can participate by completing this form and emailing it to:

immigration-consultation@mbie.govt.nz

Alternatively, submitters may also complete the [online consultation form](#) (preferred). All submissions must be received **by 5pm, 18 March 2019**.

Information

We encourage submitters to use evidence to support views in their submissions where possible. This might include independent research, facts, figures or relevant examples. We also ask you to provide information about yourself and your interest in the consultation process. MBIE will use the information provided to inform analysis and advice to Ministers. We may contact submitters directly if we require clarification of any matters raised.

Privacy and confidentiality

The Privacy Act 1993 establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including MBIE. Any personal information you supply to us in the course of making a submission will only be used for the purpose of assisting in the development of policy advice in relation to the proposals in this document.

We intend to publish written submissions on MBIE's website at www.mbie.govt.nz. This will not include personal information, but will include the names of organisations unless requested otherwise.

In addition to proactive publication, if MBIE receives a request under the Official Information Act 1982 for a copy of submissions, MBIE will need to make its own assessment of whether the information should be released, including whether it is in the public interest to release the information received. In this case, MBIE will endeavour to consult with the submitter prior to making its decision on the request.

**Please place any confidential information within your submission in square brackets.
For example:**

**[Confidential information placed in square brackets will not be released publicly
without consulting you directly]**

2. Responses

Submitter information – please tell us about yourself	
Question 1.	<p>Would you prefer your submission, either in part or in full, to be withheld from public release?</p> <p>(Personal information such as your name and contact details would not be released without consulting you).</p> <p><input checked="" type="checkbox"/> No, the content of my submission is able to be publicly released in full.</p> <p><input type="checkbox"/> Yes, <u>please withhold my entire submission</u> from any public release of submissions.</p> <p><input type="checkbox"/> Yes, please withhold private or confidential information as indicated in my submission. <u>I do not need to be consulted further</u> regarding public release of submissions.</p> <p><input type="checkbox"/> Yes, private or confidential information has been indicated in my submission. <u>Please consult me before releasing</u> my submission as part of a public release.</p>
<p>In order to make sure that the views of different groups, sectors, and regions are properly shown in any analysis, please provide some preliminary information about your submission.</p>	
Question 2:	<p>What is the name of the person completing this submission?*</p> <p>Wendy Smith</p>
Question 3.	<p>If you are submitting on behalf of an organisation, what is the name of that organisation?</p> <p>The South Canterbury Chamber of Commerce</p>
Question 4.	<p>Please provide us with at least one method of contacting you, in case we need to discuss your submission further.</p> <p><u>wendy@scchamber.org.nz</u> or 03 687 2733</p>
Question 5.	<p>What sector(s) does your submission most closely relate to?</p> <p><input checked="" type="checkbox"/> General submission - no specific sector</p> <p><input type="checkbox"/> Aged care</p> <p><input type="checkbox"/> Construction</p> <p><input type="checkbox"/> Finance</p> <p><input type="checkbox"/> Education</p> <p><input type="checkbox"/> Energy</p> <p><input type="checkbox"/> Forestry</p> <p><input type="checkbox"/> Healthcare (other than aged care)</p> <p><input type="checkbox"/> ICT</p> <p><input type="checkbox"/> Labour hire</p> <p><input type="checkbox"/> Manufacturing</p>

	<input type="checkbox"/> Natural resources <input type="checkbox"/> Petroleum and minerals <input type="checkbox"/> Retail <input type="checkbox"/> Tourism and hospitality <input type="checkbox"/> Transport and freight <input type="checkbox"/> Viticulture and horticulture <input checked="" type="checkbox"/> Other – please indicate: Note – It seems strange that agri/dairy/farming aren't on the list? It was understood that the Minister has identified dairy as one of the new sector agreements
Question 6.	Which region(s) does your submission most closely relate to? <input type="checkbox"/> All regions <input type="checkbox"/> Auckland <input type="checkbox"/> Bay of Plenty <input type="checkbox"/> Canterbury <input type="checkbox"/> Gisborne <input type="checkbox"/> Hawke's Bay <input type="checkbox"/> Manawatu-Whanganui <input type="checkbox"/> Marlborough <input type="checkbox"/> Northland <input type="checkbox"/> Nelson <input type="checkbox"/> Otago (Other than Queenstown lakes) <input type="checkbox"/> Queenstown lakes <input type="checkbox"/> Southland <input type="checkbox"/> Taranaki <input type="checkbox"/> Tasman <input type="checkbox"/> Waikato <input type="checkbox"/> Wellington <input type="checkbox"/> West Coast <input checked="" type="checkbox"/> Other (please specify) Mackenzie District, Waimate District and the Timaru District - South Canterbury
Question 7.	Which of the following most closely Describes your perspective as a submitter?* <input type="checkbox"/> Employer (<i>Continue from question 8</i>) <input type="checkbox"/> Employee (New Zealander/permanent resident) (<i>Continue from question 12</i>) <input type="checkbox"/> Employee (temporary migrant visa holder) (<i>Continue from question 12</i>) <input type="checkbox"/> Industry organisation (<i>Continue from question 12</i>) <input type="checkbox"/> Economic development agency (<i>Continue from question 12</i>) <input type="checkbox"/> Licenced immigration advisor (<i>Continue from question 12</i>) <input type="checkbox"/> Union (<i>Continue from question 12</i>) <input type="checkbox"/> Non-Governmental Organisation (NGO)/Social services provider (<i>Continue</i>

	<p>from question 12)</p> <p><input type="checkbox"/> Local Government (<i>Continue from question 12</i>)</p> <p><input checked="" type="checkbox"/> Other – please indicate: Business support membership organisation(<i>Continue from question 12</i>)</p>
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Employers only, please complete questions 8 to 11)	
Question 8.	<p>Please tell us the size of your organisation by total employees.</p> <p><input type="checkbox"/> 1-5</p> <p><input type="checkbox"/> 6-9</p> <p><input type="checkbox"/> 10-19</p> <p><input type="checkbox"/> 20-49</p> <p><input type="checkbox"/> 50-99</p> <p><input type="checkbox"/> 100-499</p> <p><input type="checkbox"/> 500+</p>
Question 9.	<p>How many applications have you supported in the last 12 months for temporary work visas?</p> <p><input type="checkbox"/> None</p> <p><input type="checkbox"/> One</p> <p><input type="checkbox"/> Two to five</p> <p><input type="checkbox"/> Six or more</p>
Question 10.	<p>How many Employer supported Temporary work visa holders do you currently employ?</p> <p>Number _____</p> <p>Percentage of your workforce: _____</p>
Question 11.	<p>If you currently employ temporary migrants, what are the skill bands are they most commonly on?</p> <p><input type="checkbox"/> Higher-skilled (ANZSCO 1-3, paid more than \$37.49 per hour)</p> <p><input type="checkbox"/> Higher-skilled (ANZSCO 4-5, paid more than \$37.49 per hour)</p> <p><input type="checkbox"/> Mid-skilled (ANZSCO 1-3, paid more than \$21.24 per hour, but less than 37.50 per hour)</p> <p><input type="checkbox"/> Lower-skilled (ANZSCO 1-3, paid less than \$21.25 per hour)</p> <p><input type="checkbox"/> Lower-skilled (ANZSCO 4-5, paid less than \$37.50 per hour)</p>
Question 12.	<p>Please indicate the 4 or 6 digit ANZSCO code, if known, for any occupations that are of particular relevance to your submission.</p> <p>(ANZSCO codes can be searched online here).</p>

	<p>A sample of Mackenzie District businesses advise the following ANZSCO codes are of particular relevance:</p> <p>811411; 431411; 542113; 621511; 621111; 111211; 431999; 351311; 351411; 131112; 312999; 132311; 132211; 452299; 899311; 431211; 831313; 841111; 452214; 149999; 851299; 431112; Unit Group 2251;</p>
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Substantive questions – Section 1

There are two broad areas of proposals in this consultation:

- A set of proposals to reform employer supported – temporary work visa settings; and
- Early thinking on aligning the immigration, welfare/employment, and skills/education systems on a regional basis.

You are welcome to submit on either or both areas of consultation.

The first section of questions relate to temporary work visa settings and include:

- Shifting to an employer-led process - The 'gateway framework' (*Section 3 of the consultation document*).
- The details of an employer accreditation framework - the employer gateway (*Section 4 of the Consultation Document*).
- Testing of the labour market for specific jobs - the job gateway (*Section 5 of the consultation document*).
 - A highly paid threshold for exemption from current Labour Market Testing.
 - The development of Regional skill shortage lists.
 - The development of sector agreements.
 - Regionally differentiated labour market testing based on indicators of the local labour market.
- Situations where INZ may not need to assess a migrants ability to do a job (*Section 7 of the consultation document*)
- Transitional arrangements (*Section 9 of the consultation document*):
 - Increasing the mid skilled remuneration threshold.
 - More facilitative settings for the partners and children of lower-skilled migrants.
 - Reviewing the stand down periods for lower skilled temporary migrants.

Proposal 1 (*Section 3 of the consultation document*)

It is proposed that the current range of employer-assisted temporary work visa categories are unified under one category called the 'employer-assisted temporary work visa.' All applications for this visa would be processed through a new gateway framework comprised of

three distinct gates where checks are complete by INZ on employers, the job offer, and the migrant applying:

- The employer gate where employers are accredited to employ temporary migrant workers;
- The job gate where checks are made to make sure no New Zealander is able to fill the job the employer is recruiting for; and
- The migrant gate where checks are made on a migrant worker's identity, health, character and qualifications to do a job.

Central to the new framework is that it is employer-led rather than migrant-led. This reflects that the temporary work visa settings should be designed around employers, the main beneficiary of the system, rather than migrants.

Question 13.

Do you support moving to an employer led process for temporary migrant workers?

- Yes, I support this proposal in full
- Yes, we support parts of this proposal
- No, I do not support this proposal
- Unsure
- No opinion on this proposal

Question 14.

With reference to Question 13, please tell us why you agree, why you don't agree or why you are unsure.

The principle behind an employer led system is sound. We agree with the employer leading the process. Simplifying to the three gate model has the potential to make the immigration process more transparent. However, the reality could mean increased compliance, increased costs and extended timeframes. For small to medium sized businesses this could be debilitating. Currently one of the biggest issues is the timeframes taken by INZ for processing visa applications, we are concerned this new process could take longer and create a bottle neck. This system could create a non responsive approach. Most businesses prefer to hire a NZ worker and are good employers and in most situations only when they find they are unable to recruit a NZ worker would they then look to hire a migrant. We recognise that the employer benefits from the employment of a migrant but so does the regional and national economy and the migrant themselves. In some industries and geographic locations there are simply not NZers available to fill the roles. The Mackenzie District is an example of this.

Question 15.

What impacts do you expect this proposal to have? Please provide evidence where possible.

Increased compliance costs disadvantaging smaller regional businesses.

Extended timeframes to complete accreditation processes.

Labour shortages for those businesses that genuinely seek to employ NZ's first.

	<p>Some improved clarity where there are sector agreements.</p> <p>The transition process and streamlined timely approvals/accreditations will be vital.</p> <p>Many small and medium enterprises (SMEs) already struggle to understand and negotiate the immigration process, so clear rationale and instruction around any new policy is essential. Businesses that fall into the standard accreditation stream should not have to incur additional expenses such as contracting immigration lawyers to ensure they are compliant. We do have concerns that INZ will not have the capacity to roll out the implementation of this in a timely manner.</p> <p>We also share Business NZ's concern re unintended consequences: <i>There is a risk that immigration policies and reducing the flow, particularly of lower-skilled workers, will have the unintended consequence of worsening working conditions for both migrant and New Zealand workers. With a shortage of available labour, particularly in service-based industries, the system will be essentially incentivising behaviour such as extended work hours with an associated increased risk to worker wellness and health and safety.</i></p> <p style="text-align: right;"><i>BusinessNZ submission 2019</i></p>
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Proposal 2 - (Section 4 of the consultation document)

It is proposed that employer accreditation is introduced for all employers who want to recruit temporary migrant workers.

Strengthening the minimum standards, the incentives employers receive, and compliance is intended to encourage employers to recruit and train New Zealanders, and reduce the risk of exploitation when migrants are employed.

Accreditation would require employers to demonstrate that their business practices:

- Incentivise training and up-skilling of New Zealanders
- Put upward pressure on wages and conditions
- Meet minimum immigration and employment regulatory standards to minimise the exploitation of migrant workers
- Maintain the integrity of the immigration system

It is proposed that there are three different accreditation types with different standards, incentives and duration.

- Standard accreditation
- Labour Hire accreditation
- Premium accreditation

The accreditation type will depend on the employer, and for some employers, will depend on their preference for additional incentives that come with premium accreditation.

Question 16.

Do you support moving to an employer led process for temporary migrant workers?

	<input type="checkbox"/> Yes, I support this proposal in full <input checked="" type="checkbox"/> Yes, we support parts of this proposal <input type="checkbox"/> No, I do not support this proposal <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion on this proposal
Question 17.	<p>Do you have any comments to make on the different accreditation groups for employers with particular reference to accreditation types, standards, duration and incentives? Please indicate if you think there are any particular impacts for smaller businesses. Yes there are quite serious implications for smaller businesses. See question 14. Simplification of this process perhaps through the network of Chambers of Commerce could assist in streamlining this process for small businesses.</p> <p>Standard accreditation should include a roll over process.</p> <p>Premium accreditation appears to offer more advantages to larger businesses including work-to-residence for skilled migrants. The period should be extended to at least three years to plan and implement training and offset compliance costs.</p> <p>We endorse Canterbury Chambers commentary in their submission 2019:</p> <p><i>Demonstrating the training and upskilling of New Zealanders can be challenging for many employers – particularly those in isolated rural areas with few locals with the skills, ability and experience required for specific roles. Despite exhaustive attempts by employers to attract and retain New Zealanders, the reality is that there are geographical areas and particular industries that will always struggle to meet this compliance requirement. We would encourage a more flexible approach from INZ where there is proven and sustained labour shortage.</i></p>
Question 18.	<p>What other evidence or employer activities should we consider as alternatives or additions to the proposed employer accreditation standards?</p> <p><i>(For example, how would you demonstrate in house training and development, or are there programmes you participate in that should be considered as evidence for meeting these standards?)</i></p> <p>The Chamber supports rewarding good business practice but this needs to be a simple non onerous process including demonstrating training, settlement support and other workplace initiatives.</p>
<p>Proposal 3 - (Section 5 of the consultation document)</p> <p>It is proposed that there are four job pathways available to employers to recruit temporary migrant workers in the future.</p> <ul style="list-style-type: none"> • High levels of remuneration • Regional Skills Shortage Lists • Sector agreements • Regionalised labour market testing <p>Three of these pathways (the highly-paid threshold, regional skills list and regional labour market test) are enhancements of the status quo. One of these pathways (sector agreements) is a new pathway.</p>	

<p>Question 19.</p>	<p>Do you agree that a sufficiently high rate of pay should exempt a job offer from needing a labour market test?</p> <p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion </p>
<p>Questions 20.</p>	<p>With reference to Question 19, please tell us why you agree, why you don't agree or why you are unsure.</p> <p>Agree in principle however question if realistic or effective as most employers could not pay the proposed 150-200% of national median wage and even if they could, would cause a huge imbalance to other employee rates already in place. Plus regional variations in pay rates need to be factored in.</p>
<p>Question 21.</p>	<p>Based on a 40 hour week, what would you consider to be a highly paid annual income threshold for your industry or region?</p> <p>This varies region to region, South Canterbury has a lower level of remuneration than Christchurch. This variation needs to be recognised and developed from available wage and survey data. For farm workers and some hospitality roles as an example the monetary value of employee benefits such as accommodation needs to be included in these calculations.</p>
<p>Question 22.</p>	<p>Do you support transitioning to regional skill shortage lists?</p> <p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion </p>
<p>Question 23.</p>	<p>How could the skills shortage lists be improved?</p> <p>The challenge is to determine the regions – sub regions and genuinely adapt to the changing market place. Again suggestion to liaise with and partner the Chambers of Commerce.</p> <p>As an example our region, however, is geographically large and diverse in its labour needs. There must be some capacity for differentiated areas to benefit from this important channel. The needs of Mackenzie District are very different from those of Christchurch or Timaru. There should be at least three sub-levels:</p> <ul style="list-style-type: none"> • Christchurch • Mid/South Canterbury • North Canterbury <p>There has to be effective consultation with relevant parties when compiling and updating these lists, including industry bodies and chambers of commerce. They also need to be reviewed regularly and implemented</p>

	quickly to respond to changing labour market needs. Seasonality of many occupations will also need to be a factor for many regions and industries.
Question 24.	<p>Do you agree that sector agreements should be introduced?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
Questions 25.	<p>With reference to Question 22, please tell us why you agree, why you don't agree or why you are unsure. Please indicate any specific sector views, where relevant.</p> <p>In principle we support the concept of sector agreements – particularly in industries that have issues with accessing a steady and ongoing labour supply. It will be essential that there is a regional and sub regional application as sectors needs differ significantly between regions.</p> <p>Agreement based on clear skills shortages for example in South Canterbury:</p> <p>Transport/truck drivers</p> <p>Aged care workers</p> <p>Tourism/Hospitality workers (the Minister included Tourism coupled with Hospitality in his announcement)</p> <p>Agri/dairy workers</p>
Question 26.	<p>Do you have any comments on what could be included or excluded from the sector agreements?</p> <p>There needs to be supplementary or clarifying notes for ANZSCO. This will allow for more reasonable recruitment options and avoid employers having to manipulate the position description to fit a rigid ANZSCO code.</p> <p>The cap on the number of migrant workers to be employed in a sector will be challenging to set both in terms of the numbers and the regional application.</p>
<p>Proposal 4 - (Section 5 of the consultation document) It is proposed to review the labour market test to make it easier or harder to recruit temporary migrant workers in a region depending on the dynamics of the local labour market in that region..</p>	
Question 27.	<p>Do you agree the labour market test could be more responsive to better reflect the different needs of the regions?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure</p>

	<input type="checkbox"/> No opinion
Questions 28.	<p>With reference to Question 27, please tell us why you agree, why you don't agree or why you are unsure.</p> <p>In Canterbury, the benefits of both a regional skill shortage list and a regional hub worked effectively. We understand the skill shortage list was reviewed regularly.</p> <p>We are concerned about how INZ will assess the labour market needs for each region and indeed to a sub region level.</p>
Question 29.	<p>How could the labour market test be redesigned to make it more responsive to regional needs?</p> <p>An established and representative body including the Chambers of Commerce, government departments and industry representatives. This could align with the RoVE recommendations.</p>
Question 30.	<p>Are there any more general improvements that could be made to the labour market test to make it work better?</p> <p>Traditional methodologies need to be updated with information from social media etc.</p>
<p>Proposal 5 - (Section 5 of the consultation document) It is proposed that labour market testing should be differentiated based on a set of indicators which reflect the labour market dynamics and growth pressures of New Zealand's sixteen regions.</p>	
Question 31.	<p>Do you agree a set of indicators could be used to differentiate regions?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
Questions 32.	<p>With reference to Question 31, please tell us why you agree, why you don't agree or why you are unsure.</p> <p>If a hard set of indicators as described in the Cabinet Paper becomes the main or only tool through which to inform a regionally-differentiated approach to the labour market test, this approach would be flawed. This needs to be blended with local information.</p>
Question 33.	<p>Of the below potential indicators, which ones do you think are most relevant to determining immigration settings for a region?</p> <p>All of the measures could be useful and will need to be reviewed regularly.</p> <p><input checked="" type="checkbox"/> Unemployment volumes and rates (including splits for Māori, Pacific Peoples, and youth and disabled people) and by region/sub-region</p> <p><input checked="" type="checkbox"/> Trend in unemployment volumes and rates</p>

	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Employment rate by age, gender, ethnicity, disability status and region/sub-region <input checked="" type="checkbox"/> Trend in employment rate and volumes <input checked="" type="checkbox"/> Underutilisation rates by age, gender, ethnicity and region / sub-region <input checked="" type="checkbox"/> Trend in underutilisation volumes and rates, by age, gender, ethnicity, disability status and region / sub-region <input checked="" type="checkbox"/> Wage levels and labour cost index projections for the next three years, by occupation, industry and region /sub-region <input checked="" type="checkbox"/> Forecast economic growth by region <input checked="" type="checkbox"/> Vacancy growth (job growth) <input checked="" type="checkbox"/> Projected annual volume of school-leavers by region/sub-region <input type="checkbox"/> Projected enrolments in tertiary education by level, field of study and by region/sub-region <input checked="" type="checkbox"/> Projected completions by level and field of study and by region/sub-region <input checked="" type="checkbox"/> Projected net migration, by occupation and by visa type and by region/sub-region <input checked="" type="checkbox"/> Number of work-tested beneficiaries by region / sub-region <input checked="" type="checkbox"/> Projected volume of exits by beneficiaries to employment by region/sub-region <input checked="" type="checkbox"/> Working age population as a proportion of total population including those not in the labour force or employment, education or training and by gender, ethnicity and region/sub-region <input type="checkbox"/> Projected change in working age population and by gender, ethnicity and region/sub-region <input checked="" type="checkbox"/> Age distribution within key occupations for region <input checked="" type="checkbox"/> Demand for housing <input checked="" type="checkbox"/> Pressure on road and rail <input checked="" type="checkbox"/> Level of planned infrastructure investment over next 3-5 years
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	<input checked="" type="checkbox"/> Level of dependency on immigration (Number of temporary migrants and their share of total employment)
Question 32.	Do you have any comments on the proposed regional indicators including how they could be applied to differentiate the regions and how the regions could be classified?
Proposal 8 - (Section 5 of the consultation document) Migrant identity, health, character and capability checks will largely remain the same.	
Question 33.	Are there situations where Immigration New Zealand should not need to review whether a migrant has the qualifications needed to do a job? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion
Questions 34.	With reference to Question 33, please tell us why you agree, don't agree or why you are unsure. There should be sufficient checks in place in the proposed gateway model.
Proposal 9 - (Section 7 of the consultation document) Some other changes impacting lower-skilled temporary migrant workers will be made to support the move to the gateway framework: <ul style="list-style-type: none"> • The remuneration threshold for mid-skilled workers will be adjusted to reflect the remuneration thresholds for the Skilled Migrant Category • All lower-skilled migrant workers will have the ability to support partners and children for the length of their visa, with partners remaining subject to a labour market test should they seek paid employment • The stand down period for lower-skilled migrants could be changed or removed 	
Question 35.	Do you have any comment to make on increasing the remuneration threshold for mid-skilled work from 85 to 100 per cent of the median income? Yes, the Chamber has concerns about the implications of a significant increase in this proposed remuneration threshold. A large number of workers that are currently on mid-skilled temporary visas will fall on visa renewal to the low-skilled category under the proposed minimum salary increase. With no prospect of residency these workers may leave New Zealand, thereby further exacerbating labour market pressures.
Question 36.	Do you have any comment to make on allowing lower-skilled temporary migrant workers to bring their partners and dependent children to New Zealand for the duration of their visa? Yes, we do support this although we recognise in areas of accommodation shortage such as the Mackenzie District this issue can be exasperated. We see the benefits of enhanced settlement, diversity and enhanced communities growing the economic strengths of a district.

<p>Question 37.</p>	<p>Do you have any comment to make on providing partners of lower-skilled temporary migrant workers with a work visa provided they meet the labour market test for a specific job?</p> <p>Yes we would like to see partners provided with a work visa. In areas like the Mackenzie District this has a very positive impact on the community as a whole and can alleviate labour market shortages.</p>
<p>Question 38.</p>	<p>Could the risks for lower-skilled migrants be managed through something other than a stand-down period?</p> <p>The Chamber supports balancing the needs of the employer and the opportunities for New Zealand workers with the rights of the migrant to have the chance to settle successfully in this region.</p> <p>We support the idea that these low-skilled workers come into the country under the explicit understanding that they are temporary workers and residency is not necessarily an option for them. Our employers and business owners advise us regularly they want to encourage these workers to stay here with their families and continue to contribute to our region. The stand down period disadvantages all parties and can cause significant problems for businesses and fellow employees who have to cover the worker through this period.</p>

Substantive questions – Section 2

There are two broad areas of proposals in this consultation:

- A set of proposals to reform employer supported – temporary work visa settings; and
- Early thinking on aligning the immigration, welfare/employment, and skills/education systems on a regional basis.

You are welcome to submit on either or both areas of consultation.

The following section of questions relates to early thinking on aligning the immigration, welfare/employment, and skills/education systems on a regional basis.

Proposal 6 - (Section 6 of the consultation document)

The job pathways will trigger a signal from the immigration system to the broader labour market system to ensure there is an adequate domestic labour supply response.

Question 39.	<p>Do you agree that demand for temporary migrant workers should trigger a response from the broader labour market system to optimise employment opportunities for New Zealanders?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
Questions 40.	<p>With reference to Question 39, please tell us why you agree, don't agree or why you are unsure</p> <p>The demand for temporary migrant workers is one indicator that needs to be considered.</p>
Question 41.	<p>Do you agree that closer alignment of the immigration, education, skills, welfare and employment systems will optimise employment opportunities for New Zealanders?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
Questions 42.	<p>With reference to Question 41, please tell us why you agree, don't agree or are unsure.</p> <p>In some areas however the benefits from employing migrants and having a diverse workforce contribute to and enable the economy to grow. For example the Mackenzie District and the service required to meet the growing needs of our international tourists.</p>
<p>Proposal 7 -- (Section 6 of the consultation document)</p> <p>How regions are differentiated will influence the domestic labour market response. This would be a collaborative response led by Government which considers education, skills, welfare, employer and other local mechanisms. This could be supported by a new regional governance framework including a regional body, strategy, information capability, and skills and job hub.</p>	
Question 36.	<p>Do you agree that a regional response is the right approach to improve domestic labour market outcomes for new Zealanders?</p> <p><input checked="" type="checkbox"/> Yes</p>

	<input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion
Questions 37.	<p>With reference to Question 36, please tell us why you agree, don't agree or are unsure.</p> <p>Regional and sub regional needs are quite different. Canterbury to South Canterbury and then a sub sub region of the MacKenzie District simply do not align.</p>
Question 38.	<p>Do you agree that a regional labour market strategy and plan would be a useful mechanism to improve domestic labour market outcomes?</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion
Questions 39.	<p>With reference to Question 38, please tell us why you agree, don't agree or are unsure.</p> <p>The principle is correct, the connection to the variables of the sub regions will need to be developed.</p>
Question 40.	<p>What purpose might a labour market strategy and plan serve in your region? What would its focus be and what would it need to contain in order to work well?</p> <p>There needs to be a connection to a full over arching plan as the variability of these across regions is marked.</p>
Question 41.	<p>Who do you think should be responsible for developing and implementing a regional labour market strategy and plan?</p> <p>This should be a collective responsibility between central and local government, industry groups and the Chambers of Commerce. However the resourcing of this needs to be recognised and the need to constantly update with statistical information and local knowledge.</p>
Question 42.	<p>Do you agree with the concept of a regional skills body to support improved regional labour market outcomes?</p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unsure <input type="checkbox"/> No opinion
Questions 43.	<p>With reference to Question 42, please tell us why you agree, don't agree or are unsure.</p> <p>The success of these groups is as yet unproven and their ability to balance a level of autonomy with national drivers.</p>
Question 44.	<p>What useful functions would a regional skills body serve in your region?</p> <p>Connection to industry Monitor trends</p>

	Connect to central government
Question 45.	<p>How might such a body work and what powers/abilities would it need to have (e.g. decision-making or powers to recommend or direct)? The autonomy to work within the framework agreed with Central Government to plan and deliver according to the identified and agreed needs of the region/ sub region and resourcing.</p>
Question 46.	<p>Do you think that regional jobs and skills hubs could be a useful way to support labour market coordination in the regions?</p> <p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
Questions 47.	<p>With reference to Question 46, please tell us why you agree, don't agree or why you are unsure. Concern is a return to a more centralised system and the absolute need for sub regions working with existing agencies.</p>
Question 48.	<p>In what circumstances could jobs and skills hubs be most useful? If you are familiar with the examples in the discussion document, please reflect this in your comments. Hubs can become central points of contact for employers and over time have the ability to be trusted partners for employers.</p>
Question 49.	<p>What do you think would be critical to making the hubs work effectively?</p> <ul style="list-style-type: none"> - Be business-friendly - Work closely with industry and training providers to plan for the labour needs of the region - Have the capacity and capability to respond to labour market testing and requests in a timely, accurate, and consistent manner - Maintain a regional focus while staying alert to trends in other regions - Be well-resourced (at a regional and national level) - Build genuine collaborative relationships with local agencies (at all levels) involved in industry, migrant employment, vocational training - Have access to relevant and up-to-date national data to inform decision-making.
Question 50.	<p>What other ways are there to get regional labour markets working better to ensure employers are placing more New Zealanders into better jobs and to reduce our reliance on temporary migrant workers? NZ's needs will not be met by only NZ employees a degree of dependency will remain.</p>

<p>Question 51.</p>	<p>What do you think the costs and benefits of a regional approach would be?</p> <p>The economic benefits will outweigh the significant costs although the wrapping up of only larger regions will be detrimental.</p>
<p>Question 52.</p>	<p>At a more general level, what other ways are there to improve labour market outcomes for New Zealanders? Better align education.</p> <p>Recognise the need for short course or micro credentialing to develop the workforce. Remove the limits on ITP's regrading lower levels of delivery and free up the market place for delivery of real needs.</p>
<p>Question 53.</p>	<p>What aspects of overseas approaches to improving labour market outcomes do you think would work in New Zealand?</p>

Proposal 10 - (Section 10 of the consultation document)

Decisions will be announced in mid-2019 with implementation occurring over the following 12 to 18 months.

Question 61.

What information and tools would be useful to help you transition to the new gateway framework?

Providing employers with clear and timely information and guidelines will be the most important factor in this transition. Information to be available on line but most critically delivered face to face through workshops – similar in nature to the one delivered by MBIE in Timaru South Canterbury.

General comments

Question 62.

Do you have any comments to make on the costs and benefits to the overall proposed changes?

The impact of poor engagement, poor lead in times and onerous compliance could have a major impact on specifically the regional economies and small businesses.

Question 63.

Do you have any other general comments you would like to make?

The South Canterbury Chamber of Commerce appreciates the opportunity to provide feedback. We represent 520 member businesses and hundreds of other non member South Canterbury Businesses. We service the MacKenzie District and have intimate knowledge of the challenges faced by employers, we are concerned that these proposals could see a huge increase in compliance costs and even longer lead in times creating negative economic impact.

The current raft of changes that are being proposed by the government could cut to the heart of our small business community. In isolation they are all significant but together could be instrumental in changing the face of regional small businesses, we reference the tax working group recommendations, the Review of Vocational Education and the work visa and regional workforce planning.

We would also politely suggest that a submission form with 63 questions is not a user-friendly document for businesses to engage with. The intent to genuinely consult with businesses is likely to be severely hampered by the context, style and complexity of this document.