

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 asterisk. 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>Toni Durham</p>
Question 3.	<p>If you are submitting on behalf of an organisation, what is the name of that organisation?</p> <p>Ashburton District Council</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>Toni Durham; Strategy & Policy Manager</p> <p>Toni.durham@adc.govt.nz</p>
Question 5.	<p>What sector(s) does your submission most closely relate to?</p> <p><input 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>

	<input type="checkbox"/> Manufacturing <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: Local Government
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 checked="" 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 type="checkbox"/> Other (please specify)
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 from question 12</i>) <input checked="" type="checkbox"/> Local Government (<i>Continue from question 12</i>) <input type="checkbox"/> Other – please indicate: (<i>Continue from question 12</i>)

Employers only, please complete questions 8 to 11)

Question 8.

Please tell us the size of your organisation by total employees.

- 1-5
- 6-9
- 10-19
- 20-49
- 50-99
- 100-499
- 500+

Question 9.

How many applications have you supported in the last 12 months for temporary work visas?

- None
- One
- Two to five
- Six or more

Question 10.

How many Employer supported Temporary work visa holders do you currently employ?

Number _____

Percentage of your workforce: _____

Question 11.

If you currently employ temporary migrants, what are the skill bands are they most commonly on?

- Higher-skilled (ANZSCO 1-3, paid more than \$37.49 per hour)
- Higher-skilled (ANZSCO 4-5, paid more than \$37.49 per hour)
- Mid-skilled (ANZSCO 1-3, paid more than \$21.24 per hour, but less than 37.50 per hour)
- Lower-skilled (ANZSCO 1-3, paid less than \$21.25 per hour)
- Lower-skilled (ANZSCO 4-5, paid less than \$37.50 per hour)

Question 12.

Please indicate the 4 or 6 digit ANZSCO code, if known, for any occupations that are of particular relevance to your submission.

(ANZSCO codes can be searched [online here](#)).

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.

<p>Question 13.</p>	<p>Do you support moving to an employer led process for temporary migrant workers?</p> <p> <input type="checkbox"/> Yes, I support this proposal in full <input checked="" type="checkbox"/> Yes, I 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 </p>
<p>Question 14.</p>	<p>With reference to Question 13, please tell us why you agree, why you don't agree or why you are unsure.</p> <p>Ashburton District Council support the proposal in principle welcoming the proposed simplification of temporary work visa categories into a single visa category. This removes ambiguity with clear demarcation of roles between the employer and employee across the temporary work visa system.</p> <p>These changes will potentially simplify the process for both employers and migrant applicants and ensure it remains clearly focused on New Zealand's labour market needs. This also supports recent findings in a NZIER report commissioned by Ashburton District Council (October 2018, attached to this submission) that highlighted the protracted nature of the current immigration application process as often deterring businesses from hiring migrants, given the potential costs involved. For example engaging immigration advisers to guide them through the application process.</p> <p>The changes proposed to the visa renewal conditions of a low skilled worker are supported in principle. Under these conditions there is greater incentive for businesses to become premium accredited employers (if employing larger immigrant numbers) to enable this certainty of ongoing employee retention. A point raised in the NZIER report notes how under the current system the lack of certainty over whether immigrants would be able to gain residency after a few years of working in the Ashburton district was a significant deterrent for many overseas applicants.</p>
<p>Question 15.</p>	<p>What impacts do you expect this proposal to have? Please provide evidence where possible.</p> <p>The proposed changes to introduce the "three gates" framework is supported in principle. This is a significant shift giving the employer more voice. However with more voice comes additional responsibility and therefore an expectation by the employer to expect good service in return. Therefore we suggest that Immigration New Zealand will need to ensure that the new model is resourced appropriately to enable response in a timely and efficient manner. Avoidance of increased processing bottle necks as a result of system changes is essential.</p> <p>Like the Canterbury Mayoral Forum Submission response, we are also concerned about potential transaction and compliance costs, particularly for SME's. As a rural-based economy with many small to medium sized businesses we are mindful of the impact increasing costs may have on these businesses.</p>
<p>Proposal 2 - (Section 4 of the consultation document)</p>	

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?

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

Question 17.

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.

We support the view of the Canterbury Mayoral Forum Submission response and also consider that in order for premium accreditation incentives to be realised and for businesses to deem this a worthy accreditation level, then officials must account for the regional differences under the Regional Skills Shortages lists to ensure that these reflect real time skills shortages that exist.

Recent findings in a NZIER report commissioned by Ashburton District Council (October 2018) highlighted the lack of certainty in migration policy noted by businesses and that this was a hindrance in closing labour shortages in the Ashburton district. Businesses particularly noted the deterioration in labour shortages following the change in immigration policy following the shortening of the skills shortage list. The report noted that a regional skills shortage list specific to the Ashburton district would be useful, to recognise that regions are not homogeneous i.e. there may be severe labour shortages in particular industries in the Ashburton district which are not felt by that same industry in another region or other part of the same region.

	<p>On reflection, we consider that there may be merit in developing a regional skills list for the greater South Island (excluding the metropolitan areas of Christchurch and Dunedin which will have vastly different labour and skill shortages). Anecdotal evidence suggests that there may be many similarities between the different areas of the greater South Island.</p> <p>Well thought out sector agreements would help inform development of a bespoke regional skills shortage list specific for greater South Island.</p> <p>It is heartening to read the proposed requirements or standards required (and the evidence to support this) by the labour hire companies and premium accredited employers have a strong pastoral care element.</p> <p>Ashburton district is one of nine participating in the Welcoming Communities, Te Waharoa ki ngā Hapori initiative, together with Immigration NZ. The Welcoming Communities programme (programme) aims to encourage and support local councils and their communities to take a greater leadership role by fostering connections and integration between newcomers and local community members.</p> <p>The programme recognises that communities are healthier, happier and more productive when newcomers are welcomed and included and when all of the community can participate fully in society and in the local economy. A welcoming community isn't just about tolerance of newcomers and cultural diversity. A truly welcoming community actively seeks to engage all of its residents, including newcomers. It embraces the contributions they make and leverages the assets they bring for the benefit of the whole community. Communities that proactively foster a welcoming environment we know, are more likely to enjoy better social connections and engagement and foster an environment of acceptance, inclusion and sense of belonging for all.</p> <p>Businesses have a considerable role in supporting immigrants to settle and contribute to a productive, sustainable and inclusive economy. Proposed pastoral care standards recognise for this key leadership role highlighting the importance businesses play in the settlement and career progression process.</p>
<p>Question 18.</p>	<p>What other evidence or employer activities should we consider as alternatives or additions to the proposed employer accreditation standards? <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>We support the views of the Canterbury Mayoral Forum Submission response and also note it is of concern that standard accreditation standards have limited if any pastoral care requirements. Regardless of an employer being considered high or low risk, businesses should demonstrate their commitment to support immigrant workers through their pastoral care and work development programmes. This is an omission that requires addressing.</p>
<p>Proposal 3 - (Section 5 of the consultation document)</p>	

It is proposed that there are four job pathways available to employers to recruit temporary migrant workers in the future.

- High levels of remuneration
- Regional Skills Shortage Lists
- Sector agreements
- Regionalised labour market testing

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>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>We support the view provided by the Canterbury Mayoral Forum Submission response..</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>We support the view provided by the Canterbury Mayoral Forum Submission response..</p> <p>However we believe that thresholds should factor in the monetary value of employee benefits such as accommodation or vehicles.</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>We strongly support development of regional skills shortage lists. Many sectors rely on access to migrant labour to sustain growth in areas where there is a labour shortage and demographic challenges.</p> <p>In a region as large as Canterbury however skill needs vary and are dictated by seasonality and skill level requirements.</p> <p>While a regional skills shortage list specific to the Ashburton district would be useful, to recognise that regions and even districts within regions are not homogeneous we do recognise that this may not be practical from an implementation perspective. Therefore we recommend that a Greater South Island (excluding Christchurch and Dunedin) regional skills shortage list is considered, as there are consistent themes of skill shortages throughout the South Island.</p>

	<p>Regardless of the boundaries of the regional skills shortage lists we believe these need to be informed by proposed sector agreements and therefore need to be flexible to adjust to changing labour market needs and supply.</p> <p>Ashburton District Council also requests that until the regional skills shortage list and sector agreements are implemented, that the South Island Contribution Work Visa is offered again.</p>
<p>Question 24.</p>	<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>
<p>Questions 25.</p>	<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>While the Ashburton District remains predominantly European, the ethnic composition is changing. Overall net migration remains positive based on projections to 2038. This contributes to an overall projected growth by 25% to 2038 .</p> <p>The fastest growing ethnic group is projected to be Pacifica, with an increase of 147% i.e. 1,700 new people.</p> <p>The second fastest is Asian by 139% (1,940) and third is Maori by 110% (2,730).</p> <p>In terms of numbers the European group will experience the highest increase i.e. 4,600 of new people however this increase will be slower or a negative increase.</p> <p>With this increasing diversity coupled with low unemployment and an ageing population, the district faces demographic and economic challenges in sustaining growth and prosperity over the long term. Certainty is therefore critical in industries that rely heavily on migrant workers.</p>
<p>Question 26.</p>	<p>Do you have any comments on what could be included or excluded from the sector agreements?</p> <p>The introduction of sector agreements provide a pathway or certainty for businesses wanting to attract employees in between the highly skilled to low skilled level i.e. mid-range. What is of concern however is little reference made to or detail written on how government will support sectors and their communities to create and incentivise job opportunities for New Zealanders.</p> <p>In a district where the working age population is shrinking and there is a significant gap in young adults, labour shortages are exacerbated and this limits the extent to which the Ashburton district can grow to meet increasing labour demand. In the absence of international or within New Zealand migration, labour shortages will become more acute.</p> <p>Development of sector level agreements will therefore require a collaborative and considered approach to regional labour market planning. The education, skills and welfare sectors and the systems they implement will need to cater for sector needs and be appropriately resourced so that</p>

	<p>the gap between demand and supply of labour is reduced and incentives and services are put in place to attract, retain (i.e. through career pathways and services to support skills needs and training) New Zealanders into these jobs.</p> <p>In addition, as noted above, industry and business have a considerable role in supporting immigrants to settle and contribute to a productive, sustainable and inclusive economy. Sector agreements offer the opportunity for sectors to act in a collaborative manner to implement initiatives and activities that will enable newcomers in the workplace and sector to feel included and appreciated for their skill.</p> <p>The agreements also offer sectors the opportunity to build their own cultural competency and understanding as a collective. Upskilling the existing workforce to understand and appreciate cultural differences and put in place processes, systems and activities to enable staff to experience, connect and communicate with others will support a more cohesive and productive working environment.</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>	
<p>Question 27.</p>	<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 <input type="checkbox"/> No opinion</p>
<p>Questions 28.</p>	<p>With reference to Question 27, please tell us why you agree, why you don't agree or why you are unsure. As outlined in the response to Question 23, regional skills shortage lists need to be informed by proposed sector agreements and therefore need to be flexible to adjust to changing labour market needs and supply. It is therefore important that there remains flexibility with respect to regional/district differences and seasonality when applying a labour market test.</p>
<p>Question 29.</p>	<p>How could the labour market test be redesigned to make it more responsive to regional needs?</p> <p>As it stands (as per Figure 6 in the consultation document) the Ashburton district would be classed as having a high labour demand with a low domestic supply. It is therefore important that flexibility remains to recognise for this dynamic and that the labour market test aligns with sector agreements and informed regional skills lists. It would be contrary to such agreements if the test failed to respond to changing labour market needs and presented further barriers for business, industry and migrant workers.</p>
<p>Question 30.</p>	<p>Are there any more general improvements that could be made to the labour market test to make it work better?</p>

	<p>Just like the regional skills shortage list, the labour market test must remain agile and responsive, not painstakingly bureaucratic, so that it can respond to quickly to labour market needs.</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>	
<p>Question 31.</p>	<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>
<p>Questions 32.</p>	<p>With reference to Question 31, please tell us why you agree, why you don't agree or why you are unsure.</p> <p>The indicators as outlined in Figure 7 are useful measures to differentiate and determine labour market dynamics and pressure points. The consultation notes that New Zealand has been divided into 16 regions. We understand that the Canterbury region encompasses South/Mid-Canterbury, greater Christchurch, and North Canterbury from the mountains to the sea.</p> <p>As noted earlier Mid Canterbury or the Ashburton district has unique labour demand and seasonality factors that differ somewhat from a large metropolitan centre such as Christchurch. It is strongly encouraged that officials recognise that regions and even districts within regions are not homogeneous, and therefore should be considered. As outlined in our response to Question 23 of the submission, we acknowledge that developing district-specific indicators may not be practicable, and suggest that consideration is given to a Greater South Island (excluding Christchurch and Dunedin) series of indicators. Regional indicators need to take account for these unique pressures and industry and business must have an opportunity to truth-test the indicators before being finalised alongside sector agreement development.</p>
<p>Question 33.</p>	<p>Of the below potential indicators, which ones do you think are most relevant to determining immigration settings for a region?</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 <input checked="" type="checkbox"/> Trend in unemployment volumes and rates <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</p>

	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Vacancy growth (job growth) <input checked="" type="checkbox"/> Projected annual volume of school-leavers by region/sub-region <input checked="" 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 checked="" 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 <input checked="" type="checkbox"/> Level of dependency on immigration (Number of temporary migrants and their share of total employment)
Question 32.	<p>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?</p> <p>We support the Canterbury Mayoral Forum Submission response.</p>
<p>Proposal 8 - (Section 5 of the consultation document) Migrant identity, health, character and capability checks will largely remain the same.</p>	
Question 33.	<p>Are there situations where Immigration New Zealand should not need to review whether a migrant has the qualifications needed to do a job?</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion
Questions 34.	<p>With reference to Question 33, please tell us why you agree, don't agree or why you are unsure.</p> <p>We support the Canterbury Mayoral Forum Submission response.</p>
<p>Proposal 9 - (Section 7 of the consultation document)</p> <p>Some other changes impacting lower-skilled temporary migrant workers will be made to support the move to the gateway framework:</p> <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

<p>Question 35.</p>	<p>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?</p> <p>In general, we support this. However we believe that thresholds should factor in the monetary value of employee benefits such as accommodation or vehicles.</p>
<p>Question 36.</p>	<p>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?</p> <p>We support the Canterbury Mayoral Forum Submission response. We believe that there are long-term impacts for families that are separated. United and cohesive families are more likely to lead positive and rewarding home and community lives if there is a cohort of family support. Anecdotal evidence also suggests that there are social impacts and adjustment issues for solo-males living in our communities without their families.</p> <p>Given that migrant families receive free primary and secondary education in New Zealand, we believe that the International Fees applied by the tertiary sector to these families is unjustified. We suggest that government policy between immigration and education needs further alignment with regard to tertiary education eligibility. The current situation highlights a lack of responsibility and accountability.</p>
<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>We strongly support this, for the reasons outlined in Question 36.</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>We support the Canterbury Mayoral Forum Submission response.</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.

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?

- Yes
 No
 Unsure
 No opinion

Questions 40.

With reference to Question 39, please tell us why you agree, don't agree or why you are unsure

We support the Canterbury Mayoral Forum Submission response. In addition we mention specific text from the NZIER report that recognises need for localised response to labour market needs :

“Businesses highlighted the difficulty in not having a pipeline of workers with skills ready for the market. The unreliability of the unemployed domestic workforce was noted as an issue.

There was a strong desire to see a consistent set of vocational training standards, which could be achieved with industry accreditation. This stemmed from recent experience with uncertainty over the validity of the qualifications of some applicants, particularly recent migrants.

Training is expensive in terms of time and financial cost. Some businesses took on trainees, but there was generally a hesitancy to invest in the training and upskilling of staff given the prevalence of poaching of staff in many industries. Besides losing staff to other businesses, there was also the uncertainty over whether staff on working holiday visas will have to leave the country after a few years should they fail to get approval for a residency visa.

Workers often decide to move to a job in Ashburton as a stepping stone to work in a role with more responsibility and then grow with the company. This highlights the need to develop opportunities for career progression in roles in Ashburton, so that staff will not move on to similar roles in other regions once they have obtained that experience.

	This general uncertainty over whether staff will stay beyond a year or two makes it difficult for businesses to plan over the longer term, and discourages them from investing in their staff. This in turn tends to reduce staff's commitment to the firm, creating a negative cycle".
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>We support the Canterbury Mayoral Forum Submission response.</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 <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion </p>
Questions 37.	<p>With reference to Question 36, please tell us why you agree, don't agree or are unsure.</p> <p>See responses to Q23 and Q26</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> <p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Unsure <input type="checkbox"/> No opinion </p>
Questions 39.	<p>With reference to Question 38, please tell us why you agree, don't agree or are unsure.</p> <p>The NZIER report is testament to this. There are consistent themes of skill shortages throughout the South Island and consider that a Greater South Island perspective (excluding Christchurch and Dunedin) may have merit.</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>We support the Canterbury Mayoral Forum Submission response.</p>

<p>Question 41.</p>	<p>Who do you think should be responsible for developing and implementing a regional labour market strategy and plan? As well as supporting the Canterbury Mayoral Forum Submission response we also advocate for the inclusion of local bodies, businesses and representatives.</p>
<p>Question 42.</p>	<p>Do you agree with the concept of a regional skills body to support improved regional labour market outcomes?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
<p>Questions 43.</p>	<p>With reference to Question 42, please tell us why you agree, don't agree or are unsure. While the concept is valid, a clear demarcation of functions, roles and responsibilities (with adequate resources and funding) will be required to enable a body of such to have demonstrable actions and outcomes.</p>
<p>Question 44.</p>	<p>What useful functions would a regional skills body serve in your region? We support the Canterbury Mayoral Forum Submission response.</p>
<p>Question 45.</p>	<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)? We support the Canterbury Mayoral Forum Submission response.</p>
<p>Question 46.</p>	<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 type="checkbox"/> Unsure <input type="checkbox"/> No opinion</p>
<p>Questions 47.</p>	<p>With reference to Question 46, please tell us why you agree, don't agree or why you are unsure. We agree with the creation of regional jobs and skills hubs and suggest if the Greater South Island region was formed that Ashburton would be ideally situated for this.</p>
<p>Question 48.</p>	<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. We support the Canterbury Mayoral Forum Submission response.</p>
<p>Question 49.</p>	<p>What do you think would be critical to making the hubs work effectively? We support the Canterbury Mayoral Forum Submission response. In addition hubs would inform regional skills shortage and sector agreement review processes as well as triggering appropriate responses to labour market needs and test thresholds.</p>

Question 50.	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? We support the Canterbury Mayoral Forum Submission response.
Question 51.	What do you think the costs and benefits of a regional approach would be? We support the Canterbury Mayoral Forum Submission response.
Question 52.	At a more general level, what other ways are there to improve labour market outcomes for New Zealanders? We support the Canterbury Mayoral Forum Submission response.
Question 53.	What aspects of overseas approaches to improving labour market outcomes do you think would work in New Zealand? We support the Canterbury Mayoral Forum Submission response.

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? Not applicable for Ashburton District Council
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General comments

Question 62.	Do you have any comments to make on the costs and benefits to the overall proposed changes? We support the Canterbury Mayoral Forum Submission response.
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Question 63.	Do you have any other general comments you would like to make? We support the Canterbury Mayoral Forum Submission response. While not directly related to this consultation, Council is concerned with recent announcements by Immigration New Zealand for the Rural Exchange New Zealand programme to meet its requirement of reciprocity of inbound and outbound trainees (who use the Work Exchange Visa). A number of local businesses utilise these trainees to operate their businesses. Under previous Governments, RENZ have been given a reciprocity dispensation but this year INZ have advised that this will not be made. We support the RENZ request to have the reciprocity dispensation continued. Ashburton District Council thanks MBIE for the opportunity to submit on the proposed new approach to employer-assisted work visas and regional workforce planning. Should the opportunity present itself to speak to this submission, Council would welcome the opportunity.
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