



Clubs Australia

26 July 2024

Department of Home Affairs
PO Box 25,
Belconnen ACT 2616

Via website: homeaffairs.gov.au

Review of Regional Migration Settings Discussion Paper – July 2024

To whom it may concern,

Clubs Australia appreciated the opportunity to provide a submission to the review of regional migration settings discussion paper (**the paper**). Our submission is attached.

Clubs Australia represents over 5,000 clubs across Australia that employ more than 140,000 people. Clubs are not-for-profit, member-owned organisations whose central activity is to provide sporting and recreation infrastructure to their members and the wider community.

Clubs in regional and rural areas are integral to their communities, offering social, economic, and community benefits. Migrant workers are and will continue to be critical to staffing our facilities for regional and remote clubs across Australia, helping them fill positions in their workforce, particularly for the skilled positions of chefs and cooks.

In a recent survey of Clubs Australia members, 69 percent of respondents indicated that they had relied on skilled migrant labour to fill the skilled positions of chefs and cooks in their clubs, and 100 percent of respondents agreed that with the ongoing skills shortage, they would continue to do so.

Should you require any further information from Clubs Australia regarding this submission, please do not hesitate to reach out at [REDACTED]

Yours sincerely,

[REDACTED]
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Executive Summary

Analysis by Jobs and Skills Australia shows that recruitment challenges are more pronounced in regional and remote areas. These areas face acute skill pressures, particularly in higher-skilled roles.¹ Feedback provided to Clubs Australia from regional and remote clubs reflects this as regional clubs continue to struggle to fill the skilled positions of chefs and cooks in the domestic market. Since food offerings serve as a critical revenue stream for regional and rural clubs and support their ongoing viability, clubs rely on migration to fill these positions. Food offerings by clubs are key to creating social opportunities for the local communities, particularly in regional and rural areas, as they provide a place to meet with friends and family and for the community to gather.

For example, Armidale Ex-Services Club has two premises in regional New South Wales and employs seven chefs and cooks, six of whom are employed on either a temporary skilled visa or employer-sponsored visa, who often stay for two to three years. If the Club were unable to utilise migration to fill these positions, it would result in:

- \$1,000,000 reduction in annual revenue;
- A minimum of 12-15 employees losing their jobs; and
- Social and economic offerings at the Club would be impacted, which would flow onto the community, including wakes, seniors visiting days and families who come in for dinner promotion nights.

It is critical that the migration system supports regional and rural areas to have access to skilled workers to ensure these communities can prosper. Clubs Australia provides the following comments to the paper:

- That migration lists must support regional Australia, including through the core skills occupation list (CSOL) and other migration lists.
- Simplifying regional employer sponsorship to remove the requirement for Regional Certifying Board certification and align with the standard employer migration sponsorship.
- Appropriate infrastructure, housing, and community support are available to encourage migrants to settle in regions and improve retention.

¹ Jobs and Skills Australia Regional Labour Market Indicator, March 2024

1. Migration Lists

In the Jobs and Skills 2023 Skills Priority List Key Findings Report, chefs were identified as one of the top 20 largest employing occupations in shortage in 2023 SPL. Chefs were also in shortage in 2022 and 2023 across metropolitan and regional Australia.²

The inclusion of chefs and cooks on the CSOL is critical to the viability of clubs, particularly in regional areas, which overwhelmingly rely on immigrant-qualified individuals to fulfil these roles. All respondents to the Clubs Australia survey noted they will be using the migration system to fill the skilled shortage of chefs and cooks in the future. Clubs have also indicated they will struggle to sustain their food offerings in the future if they cannot utilise the skilled migration system.

The Migration Strategy recommends that there be a single CSOL to reduce administrative burden. However, national analysis for a single CSOL will not appropriately account for regional differences in skill shortages, which can create disproportionate impacts for these areas. It is fundamental that a separate list is available to support regional and state/territory skill shortages.

If an occupation is not assessed as in shortage on a national basis, Jobs and Skills Australia should identify those that would satisfy the Migration Model criteria on a state or regional level and recommend that those skilled occupations in shortage in those regions be met through migration sponsorship.

Permanent employer-sponsored migration list

Clubs Australia supports the new Skills in Demand visa, which will provide a pathway to permanent residence.

However, it will be essential that all skilled occupations are eligible for sponsorship under the permanent Employer Nominated Scheme visa (ENS). If this is not possible, Clubs Australia recommends that a more extensive list than the core skills occupation list is available. This will ensure that regional and state and territory needs as well as occupations in shortage that may not have otherwise been assessed as suitable for temporary migration, given that the temporary nature of employment will not impact permanent migrant outcomes.

Clubs Australia recommends that:

- **The core skills occupation list includes chefs and cooks to support regional areas struggling with shortages in these skilled positions.**
- **The regional occupation list be retained and updated.**

² 2023 Jobs and Skills Australia Skill Shortages



- **The permanent employer-sponsored migration should be more extensive than the CSOL to ensure regional Australia can access the workers they need.**

2. Infrastructure, housing, and community support

Regional and remote areas need appropriate infrastructure, such as infrastructure, housing, and community support. Policy settings should encourage migrant workers to take up permanent residence in these areas over urban centres to ensure that migration strategically enables regional communities and economies.

The Federal Government must collaborate with states and territories to address critical housing challenges, particularly in regional communities, where availability does not match the needs and capacity of residents. Investing in more infrastructure and services in the regions will also attract skilled migrants and assist with filling the workforce shortage present in the regions and support the long-term severity of migrant workers staying in regional and rural areas.

Without appropriate policy responses, there will not be an adequate housing supply for visa holders, and living standards will be poor, Clubs Australia notes that some clubs provide some housing supply in some areas, including seniors housing, build-to-rent schemes, short-term accommodation and commercial developments on club land.

Clubs Australia recommends appropriate infrastructure, housing, and community support are available to encourage migrants to settle in regions and improve retention.

3. Regional Employer Sponsorship

The current regional employer sponsorship pathway has additional criteria to the requirements of standard employer sponsorship that do not serve a clear purpose.

Currently, one of the requirements under the regional employer nomination includes gaining Regional Certifying Body certification. This is an unnecessary administrative burden for an employer and there is no clear policy rationale for this to be a requirement.

Clubs Australia recommends the simplification of the regional employer sponsorship visa.