

# ACCI submission: CSOL 2025

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Submission to the Jobs and Skills Australia  
26 September 2025

## Introduction

The Australian Chamber of Commerce and Industry (ACCI) welcomes the opportunity to contribute to Jobs and Skills Australia's consultation on the 2025 Core Skills Occupation List (CSOL).

ACCI is Australia's largest and most representative business network, comprising state and territory chambers of commerce, national industry associations, and a council of business leaders. Together, we represent businesses of all sizes, across all sectors of the economy and in every region of the country.

Australian employers continue to face significant skill pressures, characterised by high vacancy levels, difficulty in securing appropriately skilled workers, and fragile domestic training pipelines. These challenges are not only numerical but qualitative, reflecting capability and suitability gaps<sup>1</sup>. Employers across construction, trades, hospitality, retail, tourism and other sectors<sup>2,3</sup> report these shortages as a significant constraint on operations and growth. Addressing them requires a dual track: training more Australians and improving apprenticeship and qualification completions, while also relying on skilled migration to fill verified vacancies that cannot be met locally. Skill migration and training are complementary, not substitutes.

ACCI has consistently advocated for comprehensive, employer-responsive skilled occupation lists, faster and more streamlined visa pathways, pragmatic salary thresholds, reduced red tape (including reform of redundant labour market testing), and greater transparency in list methodology. We strongly support the broad, evidence-based approach JSA has applied to the CSOL, covering all genuine Skill Level 1–3 shortages, and endorse the continued use of a methodology that is future-oriented, transparent, and responsive to industry needs.

This submission adopts a principles-based approach. While industry associations may provide detailed, occupation-specific input, this submission sets out overarching policy principles that should guide the CSOL's design, use and maintenance so that it reflects genuine employer need and commands support across our membership.

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<sup>1</sup> [Occupation Shortage Analysis | Jobs and Skills Australia](#)

<sup>2</sup> [Insights into the Australian labour market | Australian Bureau of Statistics](#)

<sup>3</sup> [Labour Force, Australia, August 2025 | Australian Bureau of Statistics](#)

Accordingly, ACCI submits that the CSOL should be guided by the following principles:

- **Breadth and responsiveness:** maintain broad coverage across Skill Levels 1–3 and update regularly in line with labour-market signals.
- **Alignment with labour-market need:** recognise both absolute shortages and capability/suitability gaps that prevent employers from filling roles locally.
- **Clarity and transparency:** provide accessible, predictable guidance on eligibility and applicable conditions so employers can plan with confidence.

completions. By aligning skilled migration with training, the CSOL can operate both as a responsive skilled migration tool and a diagnostic signal for education and workforce planning. To maximise impact, persistent shortages identified through the CSOL should directly inform adjustments in the education and training system, creating a structured feedback loop between migration policy and domestic skills development.

Embedding these principles will ensure the CSOL functions as a trusted, practical instrument that supports business continuity and growth, complements domestic skill development, and sustains public confidence in Australia’s skilled migration framework.

## Principle 1: Maintaining a broad and responsive occupation list

ACCI’s primary recommendation is that the CSOL remain broad, covering skilled occupations across ANZSCO Skill Levels 1-3. Such breadth is essential to ensure employers in all industries and regions can access skilled migration pathways to fill genuine skill needs, rather than being constrained by an overly narrow list. Skill requirements shift rapidly: a role regarded as niche today may become critical tomorrow. A wide CSOL provides the flexibility to respond to these changes, ensuring the system remains responsive by design.

The inclusion of 456 occupations in the inaugural CSOL (2024) appropriately reflected the reality that shortages extend across the economy. An expansive list allows employers in diverse fields to address their workforce gaps, and no sector’s needs should be arbitrarily excluded. Evidence from JSA confirms this need: vacancy fill rates for many Skill Level 3 occupations remain at roughly half of all advertised roles significantly lower than higher-skilled categories underscoring the importance of their inclusion<sup>1</sup>.

A broad CSOL also future-proofs the skilled migration program. Economic shocks such as the COVID-19 pandemic demonstrated how quickly new shortages can emerge. A comprehensive and regularly updated list serves as a safeguard, enabling rapid adjustment to labour-market signals. ACCI therefore strongly supports maintaining an inclusive CSOL, refreshed in consultation with JSA, as a practical and adaptive instrument to meet evolving workforce demands across the Australian economy.

## Principle 2: Alignment with labour market needs

The CSOL must reflect real demand, including both absolute shortages and capability or suitability gaps. Employers frequently report that while applicants exist, few have the experience or job-readiness required<sup>5, 6</sup>. Vacancy levels remain elevated nationally, with tens of thousands of positions in construction, trades, retail, and hospitality going unfilled<sup>4</sup>. These conditions illustrate a broader job-skills mismatch, where available workers cannot readily transition into roles in shortage due to differences in qualifications or capability. As per JSA's research, employers may re-advertise positions multiple times, but shortages persist. Sometimes, even when wages and incentives are raised, it underlines that these are genuine skill gaps, not easily solved by market adjustment alone<sup>5, 6</sup>.

These shortages are often more acute in regional and remote areas, where employers face compounding challenges of smaller labour pools, relocation barriers, and weaker training infrastructure. The CSOL should therefore recognise regional variation in demand and ensure pathways are accessible to employers outside metropolitan areas<sup>7,8</sup>.

In this context, the CSOL must continue to reflect where such mismatches are most severe. By including occupations where capability gaps prevent employers from filling roles locally, the CSOL can ensure skilled migration complements long-term training efforts, bridging immediate shortages while education and workforce strategies address structural mismatches over time.

## Principle 3: Clarity and Transparency

For the CSOL to be an effective tool, employers must be able to navigate it with confidence. Complexity and opacity in past occupation lists created frustration and deterred uptake, particularly among smaller businesses. JSA's publication of methodology in 2024<sup>9</sup> was a major step forward and should be continued. Employers need to clearly understand why occupations are included or excluded, the role of salary thresholds, and how the list will be updated. Transparency in rationale builds trust and allows industries to provide evidence where they disagree. ACCI supports the release of user-friendly materials alongside the CSOL, with explanatory notes on methodology, review cycles, practical employer-facing tools (e.g., simplified navigation materials, searchable lists, or sector-specific guidance notes) and decision criteria to improve usability, particularly for small and medium businesses without dedicated skilled migration expertise. Predictability and clarity will ensure the CSOL is not just technically sound, but practically usable by the businesses that rely on it.

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<sup>4</sup> <https://www.abs.gov.au/statistics/labour/jobs/job-vacancies-australia/latest-release>

<sup>5</sup> [CRISIS POINT: Australian Graduates "Not Work-Ready" - A Blended Solution - CAQA Compliance](#)

<sup>6</sup> [Top 5 Recruitment Challenges for Australian Employers in 2025: Overcoming Talent Shortages and the Skills Gap](#)

<sup>7</sup> [The Big Skills Challenge Report.pdf](#)

<sup>8</sup> Australian Bureau of Statistics (ABS), *Labour Force, Australia, Detailed, Quarterly* (cat. no. 6291.0.55.003).

<sup>9</sup> <https://www.jobsandskills.gov.au/download/19706/2024-core-skills-occupations-list-key-findings-report/2951/2024-core-skills-occupations-list-key-findings-report/pdf>

## Summary

In summary, ACCI supports a Core Skills Occupation List that is broad, aligned with real labour-market needs, and underpinned by clarity and transparency. Embedding these principles will ensure the CSOL remains responsive to evolving workforce pressures, complements domestic training efforts, and provides employers with the confidence and certainty they need. By sustaining this evidence-led approach, JSA can deliver a trusted instrument that both supports business continuity and strengthens public confidence in Australia's skilled migration framework.

For further information, please [REDACTED]  
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### About the Australian Chamber of Commerce and Industry

The Australian Chamber of Commerce and Industry (ACCI) is Australia's largest and most representative business network. We facilitate meaningful conversations between our members and federal government – combining the benefits of our expansive network with deep policy and advocacy knowledge. It's our aim to make Australia the best place in the world to do business. ACCI membership list can be viewed at [www.australianchamber.com.au/membership/current-members/](http://www.australianchamber.com.au/membership/current-members/)

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