

Submission by the Australian Nursing and Midwifery Federation

2025 Core Skills Occupations List (CSOL) Consultations

25 September 2025



**Australian
Nursing &
Midwifery
Federation**



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Introduction

1. The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 345,000 nurses, midwives and care-workers across the country.
2. Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.
3. Our strong and growing membership and integrated role as both a trade union and professional organisation provides us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.
4. Through our work with members, we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.
5. The ANMF welcomes the opportunity to provide feedback on the 2025 Core Skills Occupations List (CSOL), we appreciate the necessity of migration to help build a strong workforce. We however would like to state that this needs to be with a balanced approach to protect existing and growing local workforce as well as protecting the workforce of the country of origin.



Overview

6. The ANMF recognises that there are a large number of occupations listed on the 2025 CSOL for this submission we will discuss the occupations listed on the 2025 CSOL Targeted for Consultation Group list provided in the consultation details. These include the following that are relevant to our members:

- 141331 Aged Care Manager
- 263933 Diabetes Educator
- 265331 Nurse/Midwifery Unit Manager
- 265432 Registered Nurse (Acute Care)
- 265435 Registered Nurse (Primary Health Care)
- 265499 Registered Nurse nec#
- 421131 Aged Care Coordinator
- 421132 Aged Care Team Leader

7. The ANMF appreciates that this is a targeted consultation specifically for the above occupations, however we would like to state that there are roles that are also experiencing shortages that have not been listed, these include Midwives, Midwife Educators/Managers, Enrolled Nurses and Registered Nurses (Mental Health, Aged Care, Perioperative and Critical Care).

Nursing

8. Worldwide, the number of nurses is increasing and is projected to increase to 35.9 million, however this is not sufficient to meet the current and future demands as anticipated by the World Health Organisation in its State of the world's nursing report 2025.(1) The estimated shortfall is expected to increase from 5.9 million to 13 million globally. (1) This is a potentially disastrous shortfall with significant risk to the health care system globally, Australia has not been shielded from this shortfall.



9. The *'Nursing Supply and Demand Study (2023-2035)'* ⁽²⁾ demonstrates that the baseline projections across all sectors show an undersupply of 70,707 FTE by 2035 with around 79,473 nurses needed to fill the gap, with the initial balance assumption where supply is assumed to meet demand in the base year (2022).
10. The anticipated undersupply of 79, 473 nurses can be broken down into sectors. For the acute care sector, the projections show an undersupply of 26,665 FTE by 2035 and within the primary health care sector, the projections show an undersupply of 21,765 FTE by 2035. In the aged care sector, a projected undersupply of 17,551 FTE by 2035. These projections include 24/7 RN staffing and mandatory care minutes in residential aged care homes. In the mental health sector, a projected undersupply of 1,918 FTE by 2035. For the "other" sector the projections show an undersupply of 2,808 FTE by 2035.
11. The supply and demand projections predict a significant misalignment. Supply projections at a national level show that the baseline supply is estimated to increase from 324,989 FTE in 2023 to 422,575 FTE in 2035. Demand projections at a national level show that the baseline demand across all sectors is estimated to increase from 334,873 FTE in 2023 to 493,282 FTE in 2035.
12. Entry rates are higher than exit rates over the projection period – total entry rate including re-entries is between 12% to 13% and total exit rates including temporary exits between 10% to 11%. This is consistent with historic entry and exit rates.
13. The increasing demand on the healthcare system from an ageing population with greater complex needs indicates the necessity for a strong nursing workforce. The shortage that is predominant in each category demonstrates that it is necessary for Registered Nurses across all categories to be included on the CSOL.
14. The ANMF recognises that migration has a role to play in the capacity building of the workforce, however we highlight the significant increase in the number of nursing graduates entering the workforce this year and in years ahead. Without strong workforce planning, many of these newly qualified nurses will be left without secure employment. We stress that it is critical that priority is given to these locally trained graduates.



15. The ANMF supports a balanced approach, one where graduate nurses who have invested in their training in Australia and have had significant public investment are supported into meaningful jobs, while migration is used strategically to address genuine gaps rather than undermine opportunities for the local workforce.
16. We also stress that consideration be given to the needs of the countries of origin for potential international qualified workers. With no cap on Skills in Demand Visas, there is a risk that Australia may have some role in the possible decimation of the nursing workforce in overseas countries. It is vital that strategies are balanced with the needs of the Australian workforce as well as those of other countries. Consideration of ethical migration strategies are necessary for the long term success of the various Visa options. ⁽³⁾
17. We recognise that currently there is a strong reliance on migration strategies to assist in the current shortfall in nursing, particularly in the aged care sector. ⁽³⁾ However, we emphasise that this is not going to solve the long-term shortage of nurses. While increasing supply is important, it is much more important to ensure effective retention. To retain and ensure quality of the workforce, it is vital that conditions are continued to be uplifted, with pay increases, quality education and appropriate staffing.
18. The ANMF maintains that although migration has a significant role to play in workforce shortages and development, it must not be to the detriment of the local workforce. Priority must be given to the domestically educated workforce to ensure that where shortages are genuine, migration strategies are utilised appropriately.
19. As stated in previous submissions, the ANMF is deeply concerned by the growing number of internationally qualified nurses and care workers being engaged at a skill and wage level that is not commensurate with their international qualifications.
20. We are also concerned that not utilising the full skills and qualifications of internationally qualified nurses and carers, risks further entrenchment of wage exploitation and gender inequality for already vulnerable migrant workers.



Midwifery

21. The ANMF recognises that this is targeted consultation regarding the occupations listed on the CSOL, however it cannot go unmentioned that Midwives (ANZCO 254111) are in critical short supply. The '*Midwifery Futures 2025*' report identified a chronic shortfall of midwives, particularly senior midwives in Australia. One of the key strategies to grow the midwifery workforce is to attract midwives from overseas.
22. We note that 265331 *Nurse/Midwifery Unit Manager* has been listed on the CSOL however with no mention of midwives. The ANMF recommends that midwives are included. With the shortage of midwives described in the Midwifery Futures report ⁽⁴⁾, it is crucial for the future of the midwifery workforce that recognition is given to the overwhelming shortage that is currently being experienced.
23. Building capacity within the midwifery workforce is of great importance and must not be ignored. As with nursing, we must support our local workforce to build and be sustainable. However, this needs to be balanced by effective migration strategies to support experienced midwives to succeed in the Australian workforce, particularly in rural areas.

Conclusion

24. The ANMF appreciates the opportunity to provide feedback on the Core Skills Occupation List (2025), we recognise the role that migration plays in strengthening and building a sustainable workforce. We support the inclusion of the listed occupations relating to nursing and midwifery on the CSOL, however we would also support an extended list due to the known shortages within these occupations, notably midwifery.
25. We stress that although migration is a strong contributor to a quality workforce in Australia, there must be a balanced approach. We must support the local workforce to progress and be able to retain valuable, secure roles.
26. The ANMF also supports an approach to migration that not only considers Australia's needs but is balanced with the requirements of the country of origin and ensures that its healthcare system is not detrimentally impacted.



Reference

- (1) World Health Organization (WHO), (2025). *State of the world's nursing report 2025*. Geneva: World Health Organization. <https://www.who.int/publications/i/item/9789240110236/>
- (2) Department of Health and Aged Care (2023) Nursing Supply and Demand Study (2023-2035). <https://hwd.health.gov.au/resources/primary/nursing-supply-and-demand-study-2023-2035.pdf>
- (3) Sheehy, L., Fraser, J., Cheney, K. & Bloomfield, J. (2025) 'Safe, Sustainable and Ethical Recruitment of Internationally Qualified Registered Nurses to Australia', *Journal of Advanced Nursing*. First published 01 August. doi:10.1111/jan.70114
- (4) NMBA (2024) *Final Report. Midwifery Futures: Building the future Australian midwifery workforce*. <https://www.nursingmidwiferyboard.gov.au/News/Midwifery-Futures.aspx>