

AMWU Submission - 2025 Core Skills Occupations List (CSOL)



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Introduction

“We have an exceptional aviation safety record in Australia attributed to well-trained engineers. Circumnavigating our high standard of training requirements by allowing engineers trained at a lower standard to certify, will not only put the safety of our industry at risk but it will also lower the obligation of Australian companies to train within our country to alleviate our shortage of engineers. This will result in less engineers progressing to becoming licensed and leaving to other industries/trades.”

- **AMWU Member, Regional LAME**

The Australian Manufacturing Workers' Union (AMWU) is 60,000 members strong, and we live and work in every region and city of the country. Our members design, build, maintain, and repair all forms of transport including road and off-road vehicles, rail, ships, submarines and aircraft.

The AMWU is the primary union representing aircraft maintenance engineers, our coverage includes technical and supervisory, mechanical trades, aircraft engineering, technicians, and ground maintenance personnel and so we welcome the opportunity to make a submission to Jobs and Skills Australia's 2025 Core Skills Occupations List (CSOL) consultation. Specifically, this submission is concerned with the addition of the OSCA occupation 332134 – Licensed Aircraft Maintenance Engineer (LAME) to the CSOL.

To begin, we note and support the ACTU's submission to this consultation on the same topic. We agree that this occupation is not appropriate for inclusion on the CSOL. The shortage of LAMEs can be directly attributed to the deliberate and ongoing decisions of employers across this industry to redirect funding away from investment in apprenticeships, training and progression pathways for local Aircraft Maintenance Engineers (AME).

The nature of the shortage makes LAMEs an inappropriate addition to the CSLO. Creating a migration stream would exacerbate this problem by rewarding bad faith actors and – in turn – further undermine local expertise, employment standards, and passenger safety.

This submission draws on a survey of the aircraft maintenance workforce undertaken by the unions which has received more than 270 responses from AME and LAME workers – 124 of whom are AMWU members - across the nation and industry.

This workforce shortage is an industry created crisis

“No apprentices want to join our industry due to the time it takes to obtain a licence, the lack of pay, and the little-to-no job opportunities for apprentices. Young people are better off doing a trade as a plumber, electrician etc they get paid more, qualified sooner, and more work opportunities. The government need to fix this issue of pay and job opportunities first before bringing in LAMEs from other countries. This will only make the problem worse in the long run.”

- **AMWU Member, Metropolitan LAME**

We submit that the skills shortfall in the aviation sector is an industry created crisis. The shortage has been evident for decades and is likely to worsen without significant intervention. Airlines in Australia have created this problem by failing to invest in the development of a skilled workforce. The AMWU has been raising this issue with the industry, in various forums, for at least the last two decades; warning employers that they were not providing sufficient apprenticeship opportunities for AMEs, nor sufficient job opportunities for AMEs to become LAMEs to meet future workforce demand.

The industry created crisis was further exacerbated when during the height of Covid 19, some of its key players instead of supporting its workforce during this time, off loaded AMEs and LAMEs. This forced these displaced workers to find work in other industries. Despite some attempts to lure these workers back the depressed wages on offer for these trades prevent a return.

Migration is an inappropriate path to address this shortage and would remove any incentive for industry to address these problems and worsen opportunities for local workers.

The current LAME shortage does not fall into any of the currently extant JSA shortage typologies – it has been entirely manufactured by the airline industry.

Including LAMEs on the CSOL undermines and attacks the high-level of the Australian trade and risks watering down the qualification. In turn, diluting the labour market, putting downward pressure on wages, and making the industry even less attractive - making it more difficult to attract much-needed new entrants to the industry. Airlines have been aware that this is the reality and have deliberately failed to remedy the situation.

Inadequate training pipeline

"I have had to self-study in my own time and at my own expense. 13 years ago, I had finished the required 'basics' exams required to be sent on a type¹ course however the company I work for stopped training AME's in an attempt to break the ranks of the LAMEs. I couldn't afford to pay for a type course myself."

- AMWU Member, Metro AME, 20+ years in the workforce

An AME can only become a LAME if they are supported to do so by their employer – which means that when employers fail to deliver opportunities for AMEs to be trained or to upskill, they inevitably create a shortage of LAMEs. The shortage of LAMEs should not be considered a shortage of workers, but a deliberate shortage of opportunities provided by industry.

As our ACTU colleagues have noted our joint union survey of AMEs and LAMEs found 68% of respondents (189 out of 277) said that their employers' commitment to training has either declined (35%) or stayed the same (32%) over the course of their employment despite the workforce shortage in the sector. And 56% (154 of 277) of respondents described their employer's commitment to training or upskilling as 'weak' (35%) or 'very weak' (20%) while only 2% described their commitment as 'very strong'.

¹ specialized training and examination for pilots or aircraft maintenance engineers on a specific type of aircraft

This workforce shortage has been entirely driven by the availability of employer provided training opportunities – and it has been worsening over time. When asked about their training opportunities AMEs and LAMEs reveal a systematic failure to address this problem and explain that workers are being forced to bear the substantial financial (more than \$10,000) and time (including annual leave) costs of upskilling.

Workers recurrently identified limited and inconsistent training pathways; that they were being forced to pay significant fees out of pocket to progress; lack of support and paid time to study from employers; moving goalposts; and the lack of training organisations and facilities (describing Aviation Australia as a monopoly).

Danger of undermining the local workforce

“With out the equivalent training standards of skill and workmanship could compromise aircraft safety in Australia and reduce our reputation as reliable world-leading engineers.”

- AMWU Member, Regional AME, 20+ years in the workforce

We submit that eroding training pathways has been a deliberate strategy by employers with the intention to force the government to open migration pathways. Adding LAMES to the CSOL would, in effect, reward employers’ failures to address this industry wide workforce issue. And – in doing so – eliminate any incentive to improve skills and training pathways. We are also concerned that the influx of under qualified international workers will erode and undermine local wages and conditions.

Australian Aviation apprenticeships are the most robust and thorough trained globally. Trade qualifications and the pathway to attaining a licence are not just theoretical. It is of vital importance that AMEs and LAMEs have completed adequate on the job training *and* received on the job assessment. Many foreign training systems do not meet the Australian apprenticeship standards or the pathway for Australian qualified aircraft maintenance engineers to attain their licence. We have serious concerns about the equivalency of minimum qualification standards in international jurisdictions. For example, there does not appear to be a national scheme in the United States of America amongst others.

The AMWU is concerned that recognition of these foreign licences will enable the industry to bring in licensed aircraft maintenance engineers with inadequate and incomparable training. We are also concerned that the proposed changes will undermine the Australian trade qualification and, in doing so, passenger safety. Corporations will be the net beneficiaries at the expense of Australia’s skilled workers and passenger safety.

Jeopardises passenger safety

“Safety regulations overseas do not match ours. It is a significant issue that should raise alarm bells.”

- AMWU member, Metro AME, 15-20 years in the workforce

Licensed aircraft maintenance engineers are fundamentally responsible for ensuring passenger safety. Adding LAMES to the CSOL not only impacts the career progression and job security of aircraft maintenance engineers in Australia but also jeopardise safety. We do not say this to be alarmist but to underline the significance of the issue.

It is vital that there is a rigorous process to ensure any new entrants to the workforce maintain the same high-level qualification.

Recommendations:

Provide opportunities for AMEs to experience career progression (Short Term)

Our survey identified that almost 50% AMEs are interested in becoming LAMEs, of those 70% have already begun to undertake their training & 66% would be ready to work as a LAME either immediately or within less than a year. This only arises because this is an occupation where workers have been prevented by their employers from career progression – not one for which there is an actual shortage of workers available. The inclusion of LAMEs on the Core Skills Occupation List will not only reinforce the status quo but encourage further strangulation of career progression in this industry.

If industry is going to continue to put barriers in the way of workers career progression, there is need for a regulatory solution. This would combine clear minimum statutory industry standards, reporting and transparency duties, regulator enforcement powers, and fast-track dispute resolution. There is a need to ensure career progression is no longer a discretionary “reward”, but a legal entitlement backed by enforcement. Workers require opportunity and licencing when they meet published, objective criteria (time served, competencies, accredited training).

Australia must implement a centralised training program (Medium/Long Term)

We strongly oppose the inclusion of Licensed Aircraft Maintenance Engineers (LAMEs) on the Core Skills Occupation List. We do however recognise there is a workforce shortage that needs to be addressed. Although outside the scope of this consultation, we submit that industry should increase Australian apprenticeships for aircraft maintenance engineers and implement a centralised fund for a centralised training program for the medium to the long-term development of career pathways for Australian LAMEs (and AMEs).

We welcome further discussion regarding this occupation or to provide further context or clarification any of the points raised in this submission.

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