

Absolute Immigration's Submission

Core Skills Occupation List 2025



26 September 2025

Dear Jobs and Skills Australia,

Thank you for the opportunity to contribute to Jobs and Skills Australia’s consultation process on the Core Skills Occupations List (CSOL).

Absolute Immigration Group

Absolute Immigration Group (AIG) currently has two Australian entities, Absolute Immigration, and Absolute Immigration Legal, which focus only on Australian immigration law and advice.

AIG services some of the largest Australian corporations across several industries that are currently facing significant human capital challenges. As such, we are uniquely positioned to provide feedback on the practical labour market impacts of excluding certain occupations from the CSOL.

We have been approached by multiple clients operating in agriculture and forestry, professional and financial services, hospitality and retail, and health and aged care industries, who have reported significant challenges in recruiting essential management roles.

These occupations outlined below, while not always at the highest executive level, provide the frontline and middle-management capacity required to maintain compliance, ensure service delivery, and support organisational growth.

We are honoured to enable our clients to have a voice and to contribute to this submission.

If any further information is required from AIG or any of our clients, please feel free to contact the below.

Regards,

[Redacted signature block]

Submission to Jobs and Skills Australia

2025 Core Skills Occupations List (CSOL) Consultation

1. Absolute Immigration makes this submission to Jobs and Skills Australia's (JSA) Core Skills Occupation List (CSOL) consultation, on behalf of our clients who largely comprise of individuals seeking to settle in Australia and Australian employers and organisations who want to utilise the skilled migration program to address skills shortages.
2. We refer to the '*Targeted for Consultation List 2025*' and provide our submission to JSA in relation to the occupations that should be included in the 2025 CSOL. As part of our consultation process with our clients, we asked for information and feedback on the impacts that the present CSOL and access to skilled and experienced workers have on Australian businesses and their respective industries and ultimately, on the Australian economy.

Industry Specific Commentary

A Health and Aged Care

Occupations:

- **Aged Care Manager (OSCA 141331)**
- **Nursing / Midwifery Unit Manager (OSCA 265331)**
- **Health and Welfare Services Manager nec (OSCA 141399)**

3. The health and aged care sectors are experiencing systemic and sustained workforce shortages, exacerbated by Australia's ageing population, increased demand for services, and recent reforms that place higher compliance obligations on providers. Management roles within this sector are particularly critical, as they ensure quality of care, regulatory compliance, and efficient workforce coordination.
4. **Nurse Managers** and **Aged Care Managers** are indispensable to the delivery of aged care and hospital services. They are responsible for overseeing nursing teams, ensuring compliance with accreditation standards, and managing service delivery within high-risk, highly regulated environments. The changes to Australia's **Aged Care Act 2024**, which comes into effect on 1 November 2025,¹ explicitly recognises Nurse Managers and Directors of Nursing as "*responsible persons*" accountable for the management of nursing services.² Excluding this occupation from the CSOL would directly undermine the implementation of this legislation and leave providers unable to meet statutory requirements.

¹ <https://www.health.gov.au/our-work/aged-care-act/about>.

² <https://www.gen-agedcaredata.gov.au/resources/access-data/2024/october/aged-care-data-snapshot-2024;>
https://classic.austlii.edu.au/au/legis/cth/bill_em/acb202467/memo_0.html.

5. **Health and Welfare Services Managers nec** oversee a wide range of allied health and welfare programs, including pharmacy, physiotherapy, and rehabilitation services. They provide the leadership necessary to coordinate multidisciplinary teams and deliver community health programs. While JSA's data shows that around 22,800 people are employed nationally in this occupation,³ shortages are especially acute in smaller jurisdictions including the Northern Territory, ACT, Tasmania, South Australia, Western Australia, and Queensland. This geographic imbalance leaves many regional and remote communities without sufficient management capacity to ensure access to health and welfare services.
6. The failure to include these occupations on the CSOL will compromise the quality and safety of aged care, hospital, and community health services. Providers will struggle to maintain compliance with new aged care reforms, demands from an ageing population will go unmet, and service inequities between metropolitan and regional areas will worsen. The additions of Nurse Managers, Aged Care Managers and Health and Welfare Services Managers nec on the CSOL is therefore essential to ensuring continuity of care, compliance with statutory obligations, and equity in health service provision across Australia.

B Hospitality and Retail

Occupation:

- **Cafe or Restaurant Supervisor (OSCA 471532)**

7. The hospitality industry is one of Australia's most important service sectors, contributing over \$64 billion annually to the economy and supporting tourism, international education, and local communities.⁴ However, it continues to face severe and persistent labour shortages, particularly in management roles that ensure operational stability and service quality.
8. Café and Restaurant Supervisors are among the most in-demand roles in the sector. Their responsibilities extend far beyond supervision of day-to-day service — they are essential to ensuring compliance with workplace laws, training and developing staff, managing food safety, controlling budgets, and maintaining customer satisfaction.
9. Industry stakeholders report that the **removal of this occupation from the CSOL has had critical negative impacts**, particularly in regional and remote areas where reliance on migrant sponsorship is highest. Employers have also raised concerns that the alternative occupation, Hotel or Motel Manager, is not an appropriate substitute because many restaurants and cafés do not have accommodation components, and departmental decision-making has been inconsistent in accepting this as an alternative pathway.

³ <https://www.jobsandskills.gov.au/data/occupation-and-industry-profiles>.

⁴ [Addressing Workforce Shortages in Australia's Hospo Industry: Challenges and Solutions for 2024 and Beyond](#).

10. Supporting evidence is strong. Declining domestic training pathways are shrinking the local talent pool: NCVER data shows a **38% drop in commencements in Food Trade courses since 2019**,⁵ highlighting a long-term contraction in the training pipeline for future managers.
11. The Department's *Temporary Resident (Skilled) Report* (March 2024) also confirmed that Café and Restaurant Managers remain one of the most sponsored roles under the subclass 482 program, demonstrating consistent demand from employers.⁶
12. Without inclusion of this occupation on the CSOL, Australia risks undermining the sustainability of the hospitality industry. Employers will be unable to expand operations to meet rising consumer demand, service quality will decline, and regional hospitality growth will be stunted. In the absence of strong domestic training outcomes, continued access to skilled migration for Café and Restaurant Managers is essential to supporting one of Australia's most valuable and globally competitive service sectors.
13. This occupation is on the Restaurant (premium dining) Industry Labour Agreement and temporary Hotel and Accommodation Industry Labour Agreement; however, they exclude businesses that do not meet the definitions of 'fine dining' or those not in the 'hotel and accommodation' industry. Further, though the position is now on selected Designated Area Migration Agreements' (DAMAs) occupation lists, upcoming changes to DAMAs will eventually lead to removal of access to all occupations under DAMAs where they are available to be accessed via existing Industry Labour Agreements.

C Professional and Financial Services

Occupations:

- **Paraplanner (OSCA 531932)**
- **Customer Service Manager (OSCA 172132)**

14. The financial services industry is a cornerstone of the Australian economy, generating significant GDP contributions and underpinning the retirement savings, investments, and risk management of millions of Australians. Despite this, employers across the sector are reporting sustained shortages in critical **support and client management roles**.
15. **Paraplanners** are essential in bridging the gap between financial advisers and compliance frameworks. They conduct product research, prepare Statements of Advice, ensure that documentation complies with ASIC standards, and support advisers in delivering personalised financial solutions to clients. Without paraplanners, advisers must absorb compliance and administrative duties, reducing their client-facing capacity

⁵ <https://www.ncver.edu.au/news-and-events/media-releases/new-apprentice-and-trainee-data-out-now-december-quarter>.

⁶ Department of Home Affairs, *Temporary Resident (Skilled) Report* (31 March 2024).

and overall industry productivity. This not only constrains business growth but also increases the risk of compliance breaches in a heavily regulated sector.⁷

16. Current evidence indicates that 60% of businesses report shortages in managerial and client service roles. These shortages are exacerbated by several structural factors, including **increasing regulatory complexity** under ASIC and APRA frameworks, rapid digital transformation in the sector, and demographic pressures with experienced managers retiring and insufficient domestic pipelines to replace them.⁸
17. Following the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry,⁹ both ASIC and APRA have tightened compliance requirements across the financial advice sector. Paraplanners now play a critical role in ensuring financial advice documents meet best interests' duty, record-keeping, and disclosure obligations.¹⁰ This has expanded the scope of paraplanning work, requiring deeper regulatory knowledge and more time per client file.
18. Failure to include Paraplanners on the CSOL will significantly constrain growth in the financial services sector, which is one of Australia's most globally competitive industries. It will also limit employers' ability to meet compliance obligations, maintain service quality, and expand operations in both regional and metropolitan markets.
19. **Customer Service Managers** within financial services are equally indispensable. Within the financial industry, they manage teams of client service officers, supervise daily operations, and ensure the delivery of consistent, high-quality client outcomes. These roles are particularly critical in a context where consumers demand transparency, speed, and tailored service. The inability to fill these positions creates bottlenecks in service delivery, resulting in delayed client onboarding, increased error rates, and reduced consumer trust.
20. In relation to professional services, Customer Service Managers are the backbone of many organisations, providing frontline leadership that connects executive strategy with client-facing service delivery. They supervise staff, oversee service standards, manage escalations, and ensure consistency in customer experience. Without these roles, businesses cannot maintain efficiency or retain client confidence in increasingly competitive markets.
21. Current evidence indicates widespread shortages. Businesses consistently report that **core competencies such as clear communication, digital literacy, problem-**

⁷ Hays Skills Report 2025 states many professions are struggling with shortages in core skills across business, finance and HR domains. Of employers surveyed, 86% have reported a skills gap and 44% reported the skills gap is moderate and extreme. "Human skills are needed in the world of finance more than ever".

⁸ [Reshaping the Regulatory Landscape | Deloitte Australia](#).

⁹ <https://www.royalcommission.gov.au/banking>.

¹⁰ [APRA and ASIC commence Joint Administration of the new Financial Accountability Regime - KWM](#).

solving, and emotional intelligence are becoming harder to source domestically. The *Alexander Appointments 2025 Employment Market Report* notes that 60% of businesses are experiencing difficulties recruiting suitably skilled staff for customer service management roles.¹¹ Similarly, JSA's Occupational Shortage List (March 2025) found that managerial and customer service roles were among the hardest to fill across industries, with high vacancy rates recorded in both metropolitan and regional markets.

22. These shortages are compounded by structural challenges. Customer service is often perceived as a high-turnover, lower-income pathway with limited career progression, discouraging Australians from pursuing long-term management roles. This has resulted in a diminished pipeline of local candidates for supervisory and managerial positions, leaving employers with chronic vacancies and a heavy reliance on temporary staffing.
23. The absence of Customer Service Managers from the CSOL denies employers a critical tool to address these shortages. Without migration pathways, businesses face bottlenecks in service delivery, reduced client satisfaction, and a weakened ability to compete. Including this occupation on the CSOL would ensure employers can recruit and retain qualified professionals to uphold service quality, reduce turnover pressures, and strengthen Australia's consumer-facing industries.
24. For these reasons, we strongly recommend that **Paraplanner** and **Customer Service Manager** be included on the 2025 CSOL. Their recognition will enable employers to address skills shortages, reduce compliance risks, and sustain Australia's reputation as a leading financial services hub.

E Technical and Trade

Occupation:

- **Pest Control Technician (OSCA 399331)**

25. The Australian pest control market is growing rapidly. Valued at AUD 516 million in 2024, it is projected to reach AUD 735 million by 2033, with a Compound Annual Growth Rate (CAGR) of 4.01%.¹² Another report estimates growth from AUD 5.08 billion in 2024 to AUD 10.03 billion by 2031, at a CAGR of 10.2%.¹³
26. Growth is driven by **urbanisation and population growth, increasing pest-related risks, public health concerns (e.g., dengue, Xylella and Foot and Mouth Disease),**

¹¹ <https://www.alexanderappointments.com.au/what-customer-service-managers-in-australia-want-to-know-about-the-2025-employment-market>.

¹² [Australia Pest Control Market Size, Share and Trends 2033](#).

¹³ [Australia Pest Control Market Size, Share, Growth Analysis 2031](#).

stricter regulations and demand for eco-friendly pest control solutions, in addition to technological advancements such as IoT-based monitoring and smart traps.¹⁴

27. In 2024, Pest Control Technicians were re-classified from Labourers (Group 8) to Technicians and Trade Workers (Group 3) under the OSCA system.¹⁵ This reflects the technical skill and licensing requirements of the role. Including this occupation on the CSOL could open up apprenticeships and migration pathways for trained technicians.
28. Multiple indicators now point to growing demand and hiring challenges, including low fill rates for Skill Level 3 roles, rapid market expansion, the reclassification as a technical trade, and strong job availability and incentives. This supports a case for emerging shortage pressures, especially in regional areas and specialised pest management sectors.

F Agriculture and Forestry

Occupations:

- **Fruit Grower (OSCA 151232)**
- **Vegetable Grower (OSCA 151236)**

29. We concur with MIA' 2024 CSOL submission's concerns on the number of agricultural, horticultural and farming related occupations that are on the 'Off' list and 'Targeted consultation' list. Regional Australia continues to suffer disproportionate workforce shortages.¹⁶ Working Holiday makers and other temporary worker programs are utilised to ensure food production continues and export markets are supplied.
30. While some of these farming related occupations appear in various industry labour agreements (ILAs) and DAMAs, the visa options for these occupations are limited as they are not on the current CSOL.¹⁷ Employers for instance, who wish to sponsor workers outside of those ILAs or who are in locations not covered by the agreements will not have the opportunity to do so, if the occupations are not on the CSOL.¹⁸

¹⁴ [Pest control industry insights: Comprehensive guide.](#)

¹⁵ [Pest Management as a Trade – What it Means for the Industry.](#)

¹⁶ Hutchinson, D., Block, A., Robin, S., Cheng, Y., Shi, C., Zou, Z. (2023) Against The Odds - Realising Regional Australia's Workforce Potential, Regional Australia Institute, Canberra.

¹⁷ <https://devpolicy.org/why-do-australias-seasonal-worker-numbers-continue-to-fall-20250116/>.

¹⁸ <https://nff.org.au/submission/nff-submission-core-skills-occupations-list/>.

Recommendations

Recommendation One – Inclusion of Occupations on the 2025 CSOL

We recommend that Jobs and Skills Australia include the following occupations on the 2025 Core Skills Occupation List:

- **Aged Care Manager (OSCA 141331)**
- **Cafe or Restaurant Supervisor (OSCA 471532)**
- **Customer Service Manager (OSCA 172132)**
- **Fruit Grower (OSCA 151232)**
- **Health and Welfare Services Manager nec (OSCA 141399)**
- **Nursing / Midwifery Unit Manager (OSCA 265331)**
- **Paraplanner (OSCA 531932)**
- **Pest Control Technicians (OSCA 399331)**
- **Vegetable Grower (OSCA 151236)**

These occupations are not currently represented on the CSOL, yet there is clear and consistent evidence of market growth and shortages across each of these roles. Their inclusion would provide employers with access to skilled migration pathways to fill critical workforce gaps. The occupations span across the industries of agriculture and forestry, professional and financial services, hospitality and retail, and health and aged care — sectors that are central to Australia's economic growth, service delivery, and social infrastructure.

Without their inclusion, the ability of businesses to maintain compliance, provide quality services, and expand operations will be severely constrained.

Recommendation Two – Recognition of the Importance of Lower-Level and Middle Management Occupations

We recommend that Jobs and Skills Australia explicitly recognise the structural importance of **lower-level and middle-management roles** within the CSOL framework. These positions are often overlooked in policy discussions, as they fall between senior executives and frontline staff. However, they play a pivotal role in:

- **Ensuring compliance and quality control**, particularly in heavily regulated industries such as financial services, health, and aged care.
- **Maintaining service delivery standards** in customer-facing industries, including retail, hospitality, and professional services.
- **Providing workforce stability** by supervising, training, and retaining staff in industries facing high turnover and skill shortages.

Failure to acknowledge the value of these occupations risks creating bottlenecks in service delivery, undermining regulatory compliance, and constraining growth in critical industries. Their recognition would also align the CSOL with real-world workforce structures and demands.

Recommendation Three – Regional Occupations to be considered on the CSOL

Occupations on the current Regional Occupation List (ROL) provide access to sponsorship via the Skilled Employer Sponsored Regional (Provisional) visa (subclass 494) visa. This requires a skills assessment, RCB advice, and involves lengthy processing times with an increased experience requirement in comparison to the Skills in Demand (subclass 482) visa.

Therefore, it is more difficult to obtain a visa for occupations under the ROL. This is a clear contradiction with the Federal Government's support of regional initiatives including support for Australian farmers.

If the government have concerns, we suggest considering applying a caveat on that occupation on the CSOL if it wishes to 'weed' out the unwanted, such as a caveat excluding businesses with a turnover below \$1 million, or a caveat excluding businesses operating with a minimum of 5 employees.

Conclusion

Australia's economy and service delivery depend on effective management at all levels. Occupations on the **Targeted for Consultation Group list, in particular the occupations outlined above**, are not peripheral roles — they are the backbone of compliance, quality assurance, and operational continuity.

Failure to recognise these occupations within the CSOL risks:

- Intensifying existing skill shortages.
- Compromising regulatory and service quality frameworks.
- Limiting economic growth in critical sectors such as hospitality and aged care.

We therefore strongly recommend that Jobs and Skills Australia **include these occupations in the 2025 CSOL** to ensure employers can access the skills they urgently require.

References

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