

HIA Submission to Jobs and Skills Australia (JSA)

2025 Core Skills Occupations List (CSOL) Consultations September 2025





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Summary

HIA supports stable and reliable migration pathways, which includes facilitating and reducing the burden for businesses to employ overseas skilled workers. The scope of this Jobs and Skills Australia (JSA) consultation only covers the core skills occupation list (CSOL) for the Skills in Demand and Direct Entry Visas and not the other restrictive mechanics of these visa pathways. It is worth noting, however, that removing the constraints created by an exclusive occupation list will certainly reduce the regulatory burden on employers.

HIA has three broad recommendations to JSA in this CSOL 2025 consultation:

- Retain all the existing trades occupations that were included in the 2024 CSOL and add any remaining trades occupation within the scope of this 2025 consultation.
- Ensure that a comprehensive reconciliation is undertaken between the ANZSCO¹ and OSCA² occupations
 classifications has been done.
- Recommend that the additional occupations relevant to the industry in the Targeted for Consultation list be included in JSA's advice to the Australian Government:

OSCA Code	ANZSCO Code	OSCA Occupation Title
131999	NA	Construction and Engineering Managers nec#
241133	NA	Urban Designer
241232	232212	Engineering Surveyor
241234	NA	Land Surveyor
241235	NA	Mine Surveyor
241299	NA	Geospatial Information Professionals and Surveyors nec#
241931	312113	Building Surveyor
243999	233912	Engineering Professionals nec#
311533	312116	Geospatial Technician
312131	312999	Architectural Technician
312133	312199	Detailer Drafter
312134	NA	Landscape Designer
312135	NA	Surveying Technician
312199	NA	Building and Landscape Designers and Technicians nec#
312232	NA	Energy Assessor
312431	312112	Civil Construction Leading Hand
312432	NA	Construction Site Supervisor
313999	NA	Engineering Technicians nec#
332299	323215	Metal Fitters and Machinists nec#
369932	821412	Swimming Pool and Spa Builder
369933	821411	Waterproofer
371231	NA	Concreter
381232	NA	Electrical Fitter
381233	NA	Industrial Electrician
399231	712211	Driller
399599	394299	Wood Machinists and Other Wood Trades Workers nec#
399934	NA	Gas Network Technician
399999	NA	Technicians and Trades Workers nec#
Source: HIA, JSA, ABS		

¹ ANZSCO – Australian and New Zealand Standard Classification of Occupations

² OSCA – Occupation Standard Classification for Australia





Scope of submission

HIA estimates that there needs to be around 83,000 more skilled tradespeople in Australia to fulfil the workforce capacity needed to build to a pace of 1.2 million homes over five years. This is a point made in HIA's workforce analysis report, titled <u>All Hands on Deck</u>, which comprehensively highlights the different challenges to increasing the industry's labour capacity, including skilled migration.

The temporary employer-sponsored scheme is demand driven and already imposes a high cost on sponsoring businesses. By the time an employer has decided to commit to employing an overseas skilled worker, they would have already been aware of the costs and committed to the regulatory processes associated with it.

Employers should be able to determine the skills they need at any given point in time, as opposed to facing restrictive occupation lists. This applies to businesses in the residential building industry, given the exclusion of trade occupations from the fast-track, Specialist Skills Pathway of the Subclass 482 (Skills in Demand) Visa.

The residential building industry requires streamlined access to skilled workers from overseas, to fill skills gaps in the short term. This year's CSOL consultation focuses on a targeted list and appears unlikely to recommend removing occupations that were already included in the final CSOL in 2024.

The CSOL 2025 consultation was benchmarked using the new OSCA, and those on the *Targeted for Consultation List* appear to include occupations whose classifications or skill levels have changed as a result of the transition from ANZSCO 2022.

For occupations included in the final 2024 list that are set to be affected by the transition to OSCA in this CSOL 2025 consultation, JSA should **maintain** them in their final recommendation to Government. This includes occupations that were previously separated in ANZSCO that have now been merged into one code in OSCA.

For the home building industry, the CSOL 2024 included occupations covered by the ANZSCO Major 3 Group (i.e. bricklayers, stonemasons, carpenters, floor finishers, painters, glaziers, plasterers, renderers, plumbers and electricians, among others). These have not been flagged for removal, and HIA would be **firmly opposed** to any plans to exclude these occupations given the high level of demand for them.

Of interest to the industry in this year's consultation include not only on-site occupations, but also Technicians, Surveyors, Engineers and for trade occupations, Waterproofers, Concreters, Electrical Fitters, Industrial Electricians, Gas Network Technicians, and Technicians and Trade Workers nec. HIA **strongly recommends** the inclusion of these occupations, as listed in the table above, in JSA's advice to the Minister of Home Affairs and Immigration.

Employer sponsorship in the residential building industry

Sponsoring overseas skilled workers to fill skills gaps is an arduous and expensive process, the cost of which is primarily borne by the employer. These costs include levies, migration fees and the added cost of time of fulfilling regulatory requirements, such as labour market testing and proving that sponsoring an overseas skilled worker is the only way to fill the gap.

While the difficulties and areas of reform for employer-sponsored visas are outside the remit of this CSOL consultation, they form the foundations as to why the industry continues to push for a more inclusive list as opposed to using this consultation as a means of exclusion.

Specifically for the residential building industry, the scheme is also not fit-for-purpose as the industry primarily engages labour through independent contracting arrangements, meaning a skilled tradesperson (i.e. carpenter) could be working across multiple sites. Trade occupations are also unable to access the fast-track, occupation list exempt, Specialist Skills Pathway of the Skills in Demand Visa, making it even more difficult for employers to sponsor.

This pathway requires a sponsored employee to be paid at least \$141,210 per annum (as of July 2025) but excludes ANZSCO Major 3 occupations or trade occupations. Given this exclusion and despite some working in the industry able to be paid at least that amount, HIA urges Government not to add another barrier to the industry's ability to access overseas skilled workers by way of exclusion in the CSOL 2025.





This unique arrangement makes it difficult for the industry to rely on the one-size-fits-all, employer-sponsored migration scheme. It is no surprise that of the 204,800 people holding a Subclass 457/482 Visa in the March quarter 2025, just over 6,000 (or three per cent) were in home building trades occupations, some of which might be sponsored by other non-residential building industries.

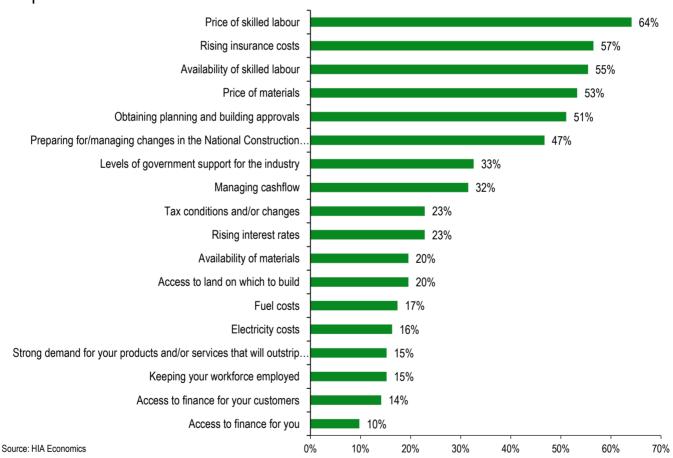
Supporting evidence

Trades prices and availability key pressure points in 2024

It remains difficult for the residential building industry to access the skilled tradespeople it needs to construct new homes and renovate the pool of established homes in Australia.

More than half of HIA members surveyed identified the price and availability of skilled labour as both the greatest pressure points of 2024, and these remain at the top of the list when members are asked about their expected pressure points over the next 12 months.

What were the greatest pressure points for your business and its operations in 2024?



HIA Trades Report

The most recent June quarter 2025 Report found that the HIA Trades Availability Index remained unchanged compared to the previous quarter, which already had a result that indicated ongoing shortages of skilled trades. None of the skilled trades registered a strong positive reading in this scale between -2.00 (critical shortage) and +2.00 (substantial oversupply).



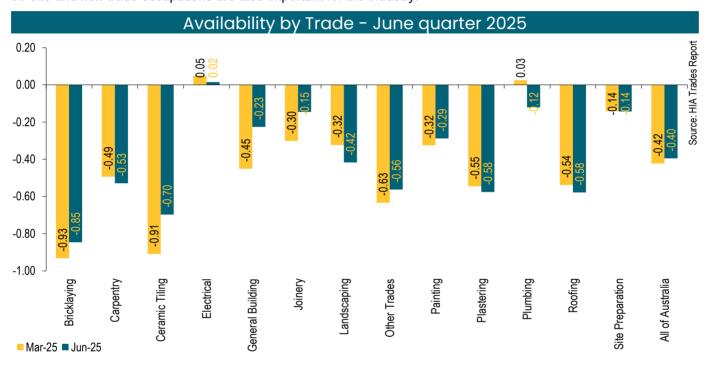


The cost of engaging skilled trades increased by 3.4 per cent in the year to the June 2025, with the largest cost increases in electrical trades (+9.1 per cent), followed by joinery (+6.1 per cent) and roofing trades (+5.8 per cent).

The recent slowdown in new home building activity has done little to offset demand for skilled trades. This is because activity in other sectors (i.e. renovations, non-residential building, civil construction and even mining) remains robust, and they utilise the same limited pool of skilled tradespeople and labourers in Australia.

With interest rate cuts already delivered and the beginning of a pickup in home building activity increasingly apparent, demand for construction skilled trades is only set to grow and the shortage likely set to worsen.

Apart from on-site skilled tradespeople, the residential building industry also engages other skillsets, such as those involved in product manufacturing, drafting, engineers and technicians. While the HIA Trades Report data primarily focuses on the 13 primary on-site skilled trades which home builders typically engage, it must be recognised that other off-site and non-trade occupations are also important for the industry.



Conclusion

There is little harm in widening the scope of occupations eligible for employer sponsorship given this is a demanddriven system. This submission calls for the occupations earmarked for consultation to not be removed in the final list to be recommended by JSA to the Minister for Home Affairs and Immigration.

The cost of government intervention by way of restricting the occupation list includes the prolonged misallocation of skills and a deterioration in industry and economy-wide productivity. It unnecessarily imposes a prohibition on an Australian employer who may need to sponsor a skilled worker for a specific occupation which was excluded by the JSA consultation process.