Response to the 2025 Critical Skills Occupation List Consultation

Ships Master, Ships Officer and Ships Engineer

Submission by CSL Australia

CSL AUSTRALIA

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1. Introduction

1.1 CSL Australia

CSL Australia (CSL) is the largest dry bulk shipowner/operator on the Australian coast. A subsidiary of Canadian owned CSL Group, CSL own and operate a fleet of up to twelve self-unloading bulk carriers, pneumatic cement carriers, standard bulk carriers and transhipment vessels in the Australian coastal region. Over 27 million tonnes of dry bulk cargoes, including cement, clinker, sugar, iron ore, gypsum, mineral sands, magnetite and coal are shipped and transhipped on CSL vessels for major industry participants on an annual basis. Our customers contribute to the cement, manufacturing, iron ore, steel and minerals sectors of the Australian economy.

CSL Group core business is owning and operating self-unloading bulk carrier vessels. In Australia, this also extends to fully enclosed pneumatic cement vessels and transhipment operations. Pneumatic cement vessels eliminate air-borne dust from cement that is discharged into shore side cement facilities. Our transhipment operations in Whyalla and Cape Preston provide economies of scale for bulk cargo exporters by providing a feeder vessel to load larger vessels within naturally deeper waters of a port.

CSL has a pipeline of projects to grow our fleet on the Australian coast. In 2026-27, we will take delivery of at least three new transhipment vessel for operation in Western Australia and replace a limestone carrier for operation in South Australia.

CSL currently employ close to 200 Australian seafarers, crane crew and shore-based staff across our fleet and office locations in Sydney, Perth, Whyalla and Karratha.

CSL's main occupation categories that are at significant risk of shortage are:

Occupation	ANZSCO Classification	OSCA Classification	2024 CSOL
Ship's Master	231213	313435	No
Ship's Officer	231214	313436	No
Marine Engineer	231212	313431	Yes

1.2 Executive Summary

As the largest dry bulk operator on the coast, CSL has first-hand evidence that the pool of qualified Masters, Officers and Engineers is already under severe pressure and will tighten sharply from 2026 onwards.

Recent changes to occupational classifications have removed these roles from the skilled migration pathways that currently provide essential relief to industry shortages. At the same time, vessel demand is set to grow rapidly, both through the current government's Strategic Fleet program and through CSL's own Australian fleet expansion. With training pipelines requiring six to ten years to deliver senior ranks, the timing gap cannot be bridged domestically.

To ensure continuity of supply chains and the delivery of national infrastructure projects, it is essential that Ships Masters, Ships Officers are included on the Critical Skills Occupation List (CSOL) and that Marine Engineers remain on the list from 2025 onwards.

CSL wish to highlight the following key points regarding the Critical Skills Occupation List (CSOL) consultation:

1. Ships Master, Ships Officer and Marine Engineer are not on the targeted for consultation list however should be considered in the 2025 consultation due to the **significant change in classification when moving from ANZSCO to OSCA.**

2. The **broad definitions** describing Ships Master, Ships Officer and Marine Engineer underestimate the significant skills shortage in these classifications for large ocean-going vessels.

3. The **proportional impact of a shortage** of these classifications is significant and detrimental to the Australian economy.

4. The **growth in demand from the implementation of the Strategic Fleet** by the current government will place extreme pressure on the labour market for these classifications.

5. **CSL will require up to an additional 60 Ships Masters, Marine Engineers and Ships Officers** from 2026 to 2028 as an additional 3 vessels are added to the CSL fleet.

2. Significant Impact of ANZSCO/OSCA reclassification

The changes to Ships Master, Ships Officer and Marine Engineer that occurred in the movement from ANZSCO to OSCA in December 2024 will significantly impact the access of these occupations to migration pathways and will place further strain on the existing skills shortage of these positions for large, ocean-going vessels.

The transition from ANZSCO to OSCA, has moved these marine occupations from Major Group 2 - 'Professional' to Major Group 3 – 'Technicians and Trade Workers'. Skilled migration eligibility is currently linked to ANZSCO codes, allowing access to Skills in Demand – Specialist Skills visa stream (subclass 482) for Professionals (Group 2) and therefore the marine occupations highlighted herein. We understand that in the future these will be linked to the OSCA codes, moving marine qualifications to 'Technicians and Trade Workers' (Group 3), which are expressly excluded from the Specialist Skills stream.

The skills shortage at CSL is currently being filled through the Skills in Demand – Specialist and Core Skills (for Engineers) visa pathways. The following table shows the number of visas currently held, together with those lodged and under preparation for lodgement for the period April to September 2025:

Occupation	**Visas currently held**	**Visa lodged (past 6 months)**	**Visa in preparation to be lodged**
Ships Engineer	7	3	6
Ships Officer	7	0	3

Under the transition to OSCA, CSL would no longer have access to the Skills in Demand migration pathway for these classifications. Section 5 and 6 demonstrate the significant growth in demand that is expected due to the commencement of the Strategic Fleet pilot program and CSL's new Australian vessel deliveries in 2026 through to 2029. This additional labour demand will exacerbate the current critical skills shortage in these maritime occupations and require access to migration pathways.

3. Definition/data set skews the data

The broad definitions used by the Australian Bureau of Statistics (ABS) to identify Master, Officer and Engineer occupations creates an unrealistic reflection of the number of suitably qualified Australian seafarers.

The current classification system treats vastly different qualifications as equivalent. For instance, a Master certified to operate vessels under 24 metres—such as tugboats or workboats in coastal waters—is grouped the same as a Master Unlimited, who can command 200-metre, international ocean-going cargo ships. The former can qualify in 2–3 years with a Certificate III, while the latter requires at least 6–8 years of training, all prior deck qualifications, and a degree or advanced diploma. This equivalence misrepresents the skill levels and labour market realities.

The broad definitions used in the ANZSCO/OSCA classifications can obscure actual labour shortages within specific subgroups. To follow on from the example above, while there is a shortage of Masters with an Unlimited qualification, there is no shortage of Masters qualified for vessels under 24 metres. Because the number of smaller vessels in Australia far exceeds the number of large, ocean-going vessels, the data is heavily weighted toward the smaller vessel workforce. This skews the overall picture and masks shortages in the higher-qualified segment.

Census data and survey data using ANZSCO/OSCA codes incorrectly demonstrates the true shortage of Masters, Officers and Engineers that require higher qualifications to work on large, ocean-going vessels.

4. Proportional impact of breaching minimum crew levels

Under Australian and international regulations, large ocean-going vessels are required to sail with a minimum number of crew in specific ranks to ensure the safety of the crew and the vessel. This complement of crew is known as 'Minimum Safe Manning' and a vessel cannot sail from a port without a specified number of seafarers onboard. The minimum safe manning of a vessel will depend on the size, type and capability of the vessel and will require a specific number of Masters, Officers, Engineers and deck/engine crew (Integrated Ratings). The average minimum manning for a bulk carrier vessel is between 15 and 25 crew members per swing (two sings per vessel). If these crew are not onboard, and the vessel cannot sail, the consequences are significant.

Australian and global supply chains are sophisticated and complex to allow for maximum efficiency. Vessels may be delayed in port for a few hours for weather, port traffic, shore/terminal operational delays or other matters. These are usual/expected delays and are for a limited time period - usually less than 12 hours. Supply chains are generally flexible enough to absorb these delays.

If the minimum number of crew cannot be sought to board a vessel – for days or weeks – and the vessel cannot sail, there are significant consequential impacts that flow through the Australian economy.

EXAMPLE – AUSTRALIAN DOMESTIC SUPPLY CHAIN – CEMENT

The MV Goliath is an Australian crewed and Australian registered pneumatic cement carrier that transports cement powder from Devonport, Tasmania to Melbourne, Victoria. This vessel performs one voyage of 15,000mt every 3-4 days, thereby undertaking up to 90 voyages a year and carrying an annual volume of around 1.0 – 1.3 million tonnes of cement. The minimum safe manning on this vessel is 15 crew members, including 1 Master, 3 Officers, 4 Engineers, 6 Integrated Ratings and a Cook. If the crew complement does not meet this requirement by even one crew member, and the vessel is delayed for more than 24 hrs, there are significant impacts to the downstream supply chain.

Cement is produced at Devonport and stored in silos. It takes only 4- 5 days to reach maximum storage capacity. If cement is not shipped out, production stops and this production cannot be recovered. Cement is produced from clinker, which is made using a kiln. A cement kiln cannot be switched on and off without considerable expense and operational considerations. Thus, if the cement silos are full, the cement mill (that crushes clinker into cement powder) will stop. Clinker production will also stop once maximum clinker storage capacity is reached, and the kiln will be switched off, at a cost of hundreds of thousands of dollars.

In Melbourne, the cement is stored at the Melbourne Cement Facility, where it is bagged and distributed across Melbourne and greater Victoria. This cement is used in major infrastructure projects. If the Melbourne silos are full, and the Goliath is unable to transport cement from Devonport, MCF can distribute cement for about 5 days before running out. Once there is no cement at MCF, major infrastructure and construction project schedules will be significantly impacted, increasing cost by millions of dollars and causing delays that could stretch for months.

Minimum crew numbers are a regulatory requirement for the continued operation of Australian domestic supply chains. If a vessel breaches minimum safe manning by only one crew member, the vessel cannot sail and the consequential damages are far-reaching and costly to the Australian economy.

5. Demand impact of the Strategic Fleet policy

The Australian government is currently implementing their commitment to create a fleet of 12 Australian flag and crew vessels. These vessels will be large, ocean-going vessels requiring STCW qualified crew. The pilot program has commenced, with three new vessels requiring Australian crew from 2026. Thereafter, crew for the remaining 9 vessels would be required in 3-5 years. If the full Strategic Fleet program of 12 vessels is implemented, an increase when compared to the current Australian large ocean-going workforce will be required as follows:

- Ships Master 73%
- Ships Officer 91%
- Marine Engineer 81%

This uplift in demand does not consider any other growth in Australian vessels numbers and associated labour requirements. The training requirement for STCW qualified Masters, Engineers and Officers of higher ranks is 3-10 years. It is impossible for the Australian maritime industry, and government, to train this number of seafarers in the next 3 years. The implementation of the Strategic Fleet program will further exacerbate the critical shortage in these occupations.

6. Growth in demand due to additional Australian vessels – CSL fleet

CSL's current Australian vessel fleet consists of three ocean-going vessels capable of sailing in international waters. The total minimum crew complement for these three vessels is 41 seafarers. The actual required number of seafarers is 82, due to the leave ratio of 1:1 and a 6-week roster swing for each crew member.

Over the next 2 years, CSL will take delivery of 3 additional Australian vessels that will require a full Australian crew. By 2027, over double the current number of crew will be required:

Year	Total crew	Proportional increase vs 2025
2025	82	
2026	156	+ 47%
2027	192	+ 134%

The three new vessels will be transhipment vessels, requiring a higher number of Masters (2 per swing) due to 24/7 continuous transhipment operations:

Year	Masters	Officers	Engineers
2025	8	18	22
2026	16	34	42
2027	20	42	52

This significant growth cannot be covered by the domestic labour market and access to migration pathways is crucial for the continued success and future growth of the maritime industry in Australia

7. Conclusion - Critical shortages will occur in 2026

The future demand for Masters, Officers and Engineers over the next 1 to 3 years must be recognised with appropriate migration pathways to allow smooth and efficient transition to greater numbers of Australian vessels requiring Australian crew. The placement of the Ships Master and Ships Officer, in addition to Marine Engineer on the Critical Skills Shortage List must occur in 2025, to allow recruitment for new vessels arriving on the coast in 2026. The Strategic Fleet vessel program and CSL's additional Australian vessels are only two contributors to demand growth from 2026 onwards. Other Australian vessels in offshore, domestic commercial vessels and expedition cruising will also add to the demand for these classifications, creating an even greater skills crisis in the bluewater maritime industry.