

CSOL SUBMISSION MTAA

26, September 2025

Table of Contents

ABOUT MTAA.....	1
OVERARCHING CHALLENGES WITH THE CSOL.....	2
PRIORITY ROLES FOR INCLUSION OR RETENTION AS PART OF THE CSOL CONSULTATION	2
ROLES THAT ARE NOT CLEARLY OUTLINED IN THE CSOL CONSULTATION THAT WOULD BE HELPFUL TO INCLUDE, THAT CANNOT BE FILLED LOCALLY AND REQUIRE MIGRATION PATHWAYS	3
CLARIFICATION ON “NEC” OCCUPATIONS IMPACTING MEDTECH SECTOR	3
BUSINESS NEED FOR “NEC” ROLES IN THE MEDTECH SECTOR.....	3
ADDITIONAL PRIORITY ROLES (NOT LISTED IN THE CONSULTATION AND NOT “NEC” CLASSIFIED).....	3
OTHER ROLES WHERE A CATEGORY CODE SUPPORTING MEDTECH MIGRATION MAYBE NEEDED	4
CONCLUSION.....	4

About MTAA

The Medical Technology Association of Australia (MTAA) is the peak association representing companies in the medical technology industry. MTAA aims to ensure the benefits of modern, innovative and reliable medical technology are delivered effectively to provide better health outcomes to the Australian community. MTAA’s membership spans Australian start-ups through to global MedTech leaders. Our members develop, manufacture and supply medical technologies used in the diagnosis, prevention, treatment and management of disease and disability.

The range of medical technology is diverse, with products ranging from familiar items such as syringes and wound dressings, to high technology implantable devices such as pacemakers, defibrillators, and orthopaedic implants. Products also include hospital and diagnostic imaging equipment such as ultrasounds and magnetic resonance imaging machines, as well as digital health technologies such as remote monitoring devices and digital therapeutics. MTAA members distribute the majority of non-pharmaceutical products used in the diagnosis and treatment of disease and disability in Australia. Our member companies also play a vital role in providing healthcare professionals with essential education and training to ensure the safe and effective use of medical technology.

Overarching Challenges with the CSOL

The current CSOL does not adequately reflect the specialised and evolving workforce needs of the medical technology (MedTech) sector. Key challenges identified across multiple companies include:

1. **Underrepresentation of critical roles:** The CSOL omits highly specialised technical, engineering, and clinical support roles essential to the safe and effective delivery of medical technologies.
2. **Rapid innovation outpacing classification updates:** The pace of technological advancement in MedTech means that new roles and hybrid skill sets emerge faster than the CSOL can adapt.
3. **Regional workforce shortages:** Companies report difficulty attracting and retaining local talent in regional areas, where skilled migration is often the only viable solution.
4. **Ambiguity in role definitions:** Broad ANZSCO categories such as “Biomedical Engineer” or “Manager” lack clarity on seniority and specialisation, making it difficult to match real-world roles to listed occupations.
5. **Exclusion of essential support functions:** Roles such as Regulatory Affairs Associates and Quality Officers, while not frequently sponsored, are vital to compliance and safety in the sector and deserve recognition.
6. **Omission of previously submitted job codes:** Several roles critical to operations have been excluded from the current consultation list, despite their ongoing relevance.

Priority Roles for Inclusion or Retention as part of the CSOL consultation

MTAA views the following job categories as important to maintain to support the Australian MedTech workforce.

Specialised Clinical and Technical Roles:

- Cardiac Technicians (ANZSCO 311212)
- Engineering Technologists (ANZSCO 2339)

Cardiac Technicians and Engineering Technologists play a vital role in supporting the safe and effective use of advanced medical technologies. These roles require specialised training and experience with proprietary systems, often not available through domestic pathways. Cardiac Technicians are essential in clinical environments, assisting with diagnostics and device support, while Engineering Technologists ensure the integration, maintenance, and performance of complex medical equipment. Due to limited local availability of candidates with the required skill sets, skilled migration pathways are critical to filling these roles. Their inclusion in the CSOL ensures continuity of care, supports innovation, and strengthens Australia’s healthcare infrastructure.

Roles that are not clearly outlined in the CSOL consultation that would be helpful to include, that cannot be filled locally and require migration pathways

Clarification on “nec” Occupations impacting MedTech sector

MTAA acknowledge Jobs and Skills Australia's guidance that all job codes are under review, and that “nec” (not elsewhere classified) occupations require evidence-based submissions. In line with this, we strongly recommend retaining access to the following “nec” roles, which are critical to the MedTech sector:

- **Specialist Managers nec** (ANZSCO 139999)
- **Life Scientists nec** (ANZSCO 234599)
- **Technical Sales Representatives nec** (ANZSCO 225499)

These roles encompass hybrid skill sets and leadership functions that are not adequately captured by other classifications. Their removal would pose significant operational and strategic challenges, including delays in product approvals, reduced clinical trial capacity, and gaps in hospital engagement and sales enablement.

Business Need for “nec” Roles in the MedTech Sector

International recruitment for these role categories complements rather than replaces domestic hiring efforts. However, removing access to skilled migration pathways for these occupations would significantly constrain the MedTech sector's ability to fill critical positions.

These roles particularly those classified under ANZSCO 225499 (in MedTech these could include roles such as Clinical Specialists and Territory Managers) require a unique blend of clinical, technical, and commercial expertise that is not readily available in the Australian labour market. Candidates must possess specialised qualifications, including relevant degrees and healthcare experience, and undergo extensive, ongoing training tailored to specific products, hospital environments, and operating theatre protocols.

Due to the complexity and specificity of these roles, sourcing talent solely from within Australia is often not feasible. International hires bring deep expertise in therapy areas and proprietary technologies, which not only fills immediate skill gaps but also contributes to the upskilling of local teams through knowledge transfer and mentoring.

Additional Priority Roles (Not Listed in the Consultation and Not “nec” Classified).

The following roles are not currently listed in scope for the consultation and are not classified as “nec,” but are considered critical to the medical technology sector and must remain accessible via skilled migration pathways:

1. **Marketing Specialist** (ANZSCO 225113)
2. **Sales Representative (Medical and Pharmaceutical Products)** (ANZSCO 225412)
3. **Sales and Marketing Manager** (ANZSCO 131112)
4. **Organisation and Methods Analyst** (ANZSCO 224712)
5. **Biomedical Engineer** (ANZSCO 233913)
6. **Human Resource Adviser** (ANZSCO 223111)

These roles support commercial strategy, product deployment, workforce capability, and operational efficiency. Restricting access to skilled migration pathways for these occupations would significantly impact the Australian MedTech sector's ability to deliver innovative healthcare solutions and maintain global competitiveness.

Other roles where a category code supporting MedTech Migration maybe needed

Digital Health and Data Specialists

As hospitals increasingly adopt connected medical technologies, Digital Health and Data Specialists are needed to integrate devices into broader IT systems (roles that do not necessarily fit classic roles of data analyst and scientists as outlined in the CSOL). Local capability in this area is still developing. Migrants with global experience in clinical informatics and system integration related to MedTech are essential to advancing Australia's healthcare transformation.

Conclusion

The Australian MedTech sector relies on a highly skilled, globally sourced workforce to deliver safe, effective, and innovative healthcare solutions. The CSOL must evolve to reflect the specialised roles and hybrid skill sets that underpin this industry. MTAA recommends Jobs and Skills Australia to retain and expand migration pathways for the roles outlined above to ensure continued access to global MedTech expertise, support regional workforce needs, and foster the development of Australia's MedTech capabilities.