

25 September 2025

Trevor Gauld
Deputy Commissioner
Jobs and Skills Australia

Via Email: [REDACTED]

Dear Mr Gauld

RE: 2025 CSOL Consultation

Thank you for the opportunity to contribute to the Jobs and Skills Australia consultations on the composition of the 2025 Core Skills Occupation List (CSOL).

This submission is from the Plumbing Industry Climate Action Centre (PICAC) on behalf of the leading stakeholder representatives in the Plumbing and Fire Protection Industry (the Industry). These stakeholders are the Plumbing and Pipe Trades Employees Union (PPTU), Master Plumbers and Mechanical Services Association of Australia (MPMSAA), National Fire Industry Association of Australia (NFIA) and the Air Conditioning and Mechanical Contractors Association (AMCA) and the Association of Hydraulic Design Consultants Australia (AHSCA).

Ensuring Australia develops the skilled workforce required to continue to grow economically, to grow safely, to meet the dual major challenges of meeting the demand for housing and infrastructure, and to additionally transition Australia's energy mix from fossil fuels to renewable energy, is critically important. Industry welcomes the opportunity to contribute its perspectives to the very important work of Jobs and Skills Australia (JSA). In 2025 the Australian economy, including in our sector, faces some significant workforce challenges and the need for an evidenced based, strategic and coordinated approach to workforce planning. Included in this approach is the strategic and effective use of skilled migration, which has never been more important for the Australian economy.

The Industry is at the forefront of Australia's workforce challenges. The Industry is at the leading edge of sustainability and climate change adaptation, and is a critical, catalytic component of domestic housing and critical infrastructure. For example, the HVAC (heating, ventilation, air conditioning) part of the sector is critical to energy efficiency, emissions reduction and high-performance building environments. Workforce demand for HVAC skills is increasing due to net-zero initiatives, electrification and smart building technologies. In this context we see the work of the JSA, including the development of the Occupational Shortage List (OSL) and the CSOL as critical in terms of providing definitive data and information and helping inform a national strategic approach.



Building the Plumbing
Workforce of the Future

[REDACTED]
[REDACTED]
[REDACTED] www.picac.vic.edu.au



The 2024 CSOL (for the temporary SID visa) includes:

- 334112 Airconditioning and Mechanical Services Plumber
- 334113 Drainer
- 334114 Gasfitter
- 334115 Roof Plumber
- 334116 Plumber (General)
- 334117 Fire Protection Plumber
- 342111 Airconditioning and Refrigeration Mechanic

Industry supports the decision to keep these occupations on the list for 2025. As noted by JSA, the CSOL has not been in effect for long enough to warrant changes to its 2024 advice to government, meaning these occupations should remain on the CSOL for 2025. The above listed occupations are all categorised as being in shortage in all Australian jurisdictions and keeping them on the CSOL is appropriate.

Industry notes that the focus of this round of JSA consultation is on the occupations deemed as being in the “targeted for consultation group”. Given this list does not include plumbing or related trades or occupations, we do not have comments on whether occupations on this list should be moved to the CSOL.

The CSOL is a key part of the Commonwealth Government’s Migration Strategy and directly informs eligibility for the Skills in Demand (SID) visa. The success of the overall strategy relies on prospective skilled migrant workers using the skilled migration pathway. Currently the number of skilled migrant plumbers seeking to enter the Australian industry via the skilled migration pathway is relatively low, in the 100-200 range per annum. Anecdotal evidence from Industry stakeholders indicates that there are many more than that number working in and around the industry, suggesting migrant workers are entering the system via other mechanisms. Industry is currently working with BuildSkills Australia on the issue of migrant plumbers. A key focus of that work is understanding the extent to which the current systems around assessment and pre-licensing evaluation are robust and sufficiently accessible to support skilled migration, and do not act as blockers, or incentive migrant workers to use other pathways.

Thank you for the chance to have input into this important process, which we understand JSA will conduct on an annual basis. Whilst Industry does not have any substantive comments to make about the current proposals (to keep the current list in place for 2025), the Industry context is dynamic. It may be that in future years Industry will have particular views to put to JSA about the benefits of adding or removing certain plumbing, HVAC or fire protection related occupations from the CSOL.

In this context we note and thank you for your offer of an earlier and more targeted round of stakeholder briefing by JSA ahead of this review process next year and in subsequent years. We think this would greatly assist PICAC and industry stakeholders, particularly employer

representatives, to better understand the role of JSA and the CSOL in the overall skilled migration process.

Should you wish to discuss the issues raised in this submission, please

[REDACTED]

Yours sincerely

[REDACTED]