

26 September 2025

Dear Jobs and Skills Australia

### PPA Supplementary Submission for the Core Skills Occupations List 2025

Thank you for the opportunity to meet with [REDACTED] (Assistant Secretary, Labour Market and Migration Branch) and [REDACTED] (Director, Skilled Migration and International Section) on 25 September 2025 to discuss the Core Skills Occupations List (CSOL) 2025. Public Pathology Australia (PPA) provides the following additional commentary and evidence in support of our request for Medical Laboratory Technicians (MLTs) to be included on the CSOL.

PPA and Australian Institute of Medical and Clinical Scientists (AIMS) lodged a joint submission on 15 September 2025 in support of both MLT (ANZSCO 311213 and OSCA 311233) and Medical Laboratory Scientist (MLS) (ANZSCO 234611 and OSCA 244731) being retained on the CSOL. Further to this, PPA would like to provide further information about MLT worker outcomes, particularly how MLTs are supported in the workplace and career development opportunities leading to high retention rates, as PPA and AIMS believe **MLTs should not be omitted from the CSOL** as proposed.

The public pathology sector supports MLTs in the workplace and their retention and transition to the MLS workforce to support workplace needs. Activity in pathology is growing nationally at an average of 5 per cent year on year, with certain disciplines such as genetics currently undergoing a period of supercharged growth in line with the rapid developments in technology. The challenge of meeting growing testing volumes is particularly challenging when there is a workforce shortage in pathology ([Royal College of Pathologists of Australasia, 2024](#)). MLT and MLS staff have skills in demand in pathology workplaces across Australia.

Laboratory technicians obtain on-the-job laboratory skills and knowledge with the option to undertake further tertiary study to become a qualified MLS. The public pathology sector provides a range of financial and leave support to assist MLTs to undertake additional study. Overseas qualified scientists, who hold a qualification not recognised in Australia, may undertake an assessment with the AIMS to have their qualifications reviewed and recognised and/or undertake additional assessments to be a recognised MLS in Australia. *Please refer to the attached Career Pathways document.*

MLTs are supported in the workforce by various wraparound support systems across Australia. As public pathology services are accredited medical services, MLTs and MLSs are supported with professional development opportunities, career progression, mentoring and effective supervision. Competencies are evaluated and roles structured to enable staff perform at the top of their scope of practice to mitigate the current workforce shortages of pathologists. This leads to high retention rates of MLTs and MLSs, and services may offer staff a permanent MLT or MLS role within the public sector.

A snapshot from one of our member public pathology services of staff who entered the workplace on an international visa is shown below. This demonstrates a high level of retention which is reflective of positive worker outcomes. It is common practice for MLTs to progress to MLSs. This reflected in MLT:MLS staffing ratios of those who have entered the workforce on an international visa, which again is reflective of positive worker outcomes.

International Visa, Category	Start Date	Status	Length of service
MLT	11/11/2013	Permanent	11
MLT	03/10/2016	Permanent	8
MLT	31/01/2022	Permanent	3
MLT	20/11/2023	Permanent	1
MLT	06/01/2025	Fixed Term	0
MLS	15/03/2010	Permanent	15
MLS	22/08/2011	Permanent	14
MLS	17/05/2010	Permanent	15
MLS	17/01/2011	Permanent	14
MLS	11/05/2011	Permanent	14
MLS	07/08/2017	Permanent	8
MLS	19/05/2014	Permanent	11
MLS	28/11/2016	Permanent	8
MLS	12/12/2016	Permanent	8
MLS	18/09/2017	Permanent	8
MLS	03/08/2020	Permanent	5
MLS	01/02/2021	Permanent	4
MLS	06/09/2021	Permanent	4
MLS	04/01/2022	Fixed Term	3
MLS	17/01/2022	Permanent	3
MLS	26/06/2023	Fixed Term	2
MLS	14/08/2023	Fixed Term	2
MLS	29/07/2024	Fixed Term	1
MLS	12/08/2024	Fixed Term	1
MLS	24/09/2024	Fixed Term	1

We trust this provides sufficient evidence to justify the inclusion of MLTs together with MLSs on the CSOL.

If you have any questions or would like to discuss this request, please [REDACTED]

Yours faithfully

[REDACTED]  
[REDACTED]

[REDACTED] [REDACTED]  
[REDACTED]  
[REDACTED] [REDACTED]

# **Career Pathways:**

## **Medical Laboratory Technicians & Medical Laboratory Scientists**

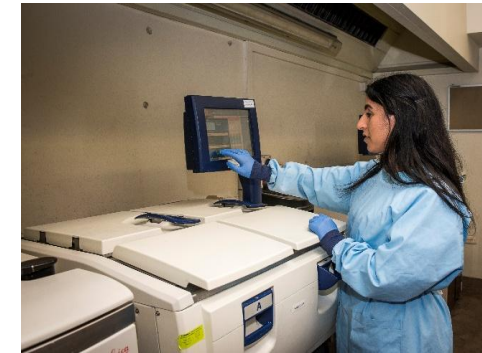
---

26 September 2025

# Overview of Public Pathology Workforce

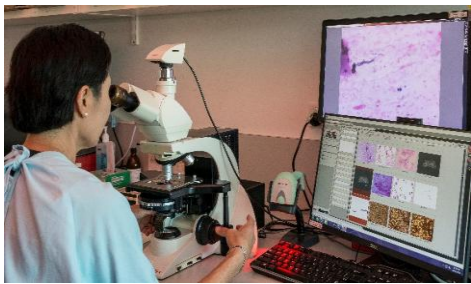
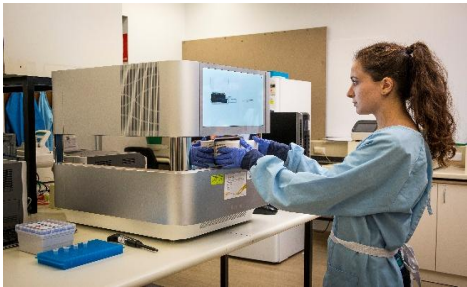
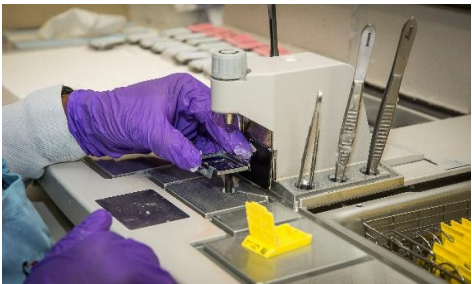
Public pathology employs over 13,000 staff in a broad range of roles

Clinical / Scientific / Technical	Management	Operational	Support Services
Pathologists	Executive	Phlebotomists	Human Resources, Work Health & Safety
Medical Laboratory Scientists	Management	Couriers	Engineering
Medical Laboratory Technicians	Learning & Development	Specimen Reception	Information Technology
	Accreditation, Quality, Safety & Risk	Call Centre	Communications & Client Liaison
		Consumer Products, Point of Care	Accounts



# Pathology Disciplines

Anatomical Pathology	Chemical Pathology	Genetics & Molecular Pathology	Haematology	Immunology	Microbiology & Infectious Diseases	Multidisciplinary
Histopathology	Core Chemistry	Biochemical Genetics	Core Haematology & Morphology	Clinical Immunology	Bacteriology	Core Chemistry
Cytopathology	Toxicology	Molecular Pathology	Blood Bank	Allergy	Serology/Virology	Core Haematology
Surgical Pathology	Pharmacology	Genomics	Haemostasis	Flow Cytometry	Environmental	Blood Bank
Mortuary	Industrial Monitoring	Cytogenetics	Cellular Therapies	Immunodeficiency	Reference Laboratory (TB, Salmonella, Mycology)	Bacteriology
		Clinical Genetic Services		Rheumatological		Histopathology



# Medical Laboratory Technicians

## Required Qualifications

A Technical Officer is a person with relevant training and competence, and who is authorised to perform laboratory functions. This person must possess one of the following:

- a. a qualification in the field of pathology awarded by a tertiary level Australian institution, following successful completion of a course of at least two years' full time study or an equivalent period of part time study; or
- b. a qualification at Australian Qualifications Framework level 5 or 6 with subjects relevant to the field of pathology awarded by an overseas institution accredited by the Australian Institute of Medical Scientists (AIMS), according to their authority approved by Australian Education International via the National Office of Overseas Skills Recognition.



# Medical Laboratory Technician Pathways

Laboratory	Management
Diagnostic – Bench Technician	Team Leader/Supervisor
Diagnostic – Senior Technician	Safety Quality & Risk
Research	Learning & Development
	Accreditation

## Diagnostic Laboratory Technician

Collects, receives, prepares, tests and analyses human biological material to support patient diagnosis, management and treatment. Laboratory Technicians select appropriate samples and prepare those for analysis using the appropriate laboratory equipment and testing protocols. While Laboratory Technicians may analyse and interpret laboratory results, they work within approved guidelines and protocols. Laboratory Technicians practise under the direction of a Laboratory Scientist or other appropriately qualified person who has expertise and knowledge in the relevant area.

## Senior Laboratory Technician

Specialises in discipline-specific testing, training, or supervision of staff under the direct management of Senior Laboratory Scientists. They may perform direct transfers and dissection on non-complex and complex specimens in Anatomical Pathology.

# Medical Laboratory Technician Pathways



## Research Technician

Supports research activities through routine testing practices and presentation of data for analysis. The Research Technician operates and maintains equipment to ensure testing is conducted consistently and at high quality to meet the requirements of research studies.



## Management

Laboratory Technicians may progress into management and leadership roles within the support services that are critical for the effectiveness of public pathology laboratories. These include supporting supervision and training of laboratory staff, development of training and professional development resources and assuming leadership roles to monitor health, safety and risk throughout the laboratory to support accreditation and effective clinical governance requirements.



# Medical Laboratory Technician Pathways

## Transition Pathways for Laboratory Technicians

Public pathology supports the transition of Laboratory Technicians to the Scientific workforce to support workforce needs. Laboratory technicians obtain on-the-job laboratory skills and knowledge with the option to undertake further tertiary study to become a qualified Medical Laboratory Scientist. Overseas qualified scientists, who hold a qualification not recognised in Australia, may undertake an assessment with the AIMS to have their qualifications reviewed and recognised and/or undertake additional assessments to be a recognised Medical Scientist in Australia.



# Medical Laboratory Scientists

## Required Qualifications

A Scientist is a person with competence to perform the functions required and who is authorised to perform these functions. A medical scientist must possess one of the following qualifications:

- a. A degree at Australian Qualifications Framework level 7 awarded from a university in Australia with >70% of subjects relevant to the field of pathology of a 3-year degree; or
- b. A degree at Australian Qualifications Framework level 7 with subjects relevant to the field of pathology awarded by an overseas tertiary institution if the qualification is assessed as equivalent to a degree accredited by the Australian Institute of Medical Scientists; or
- c. An associate qualification conferred by the Australian Institute of Medical Technologists before 1 December 1973.

# Medical Laboratory Scientist Pathways



Laboratory	Management	Clinical
Diagnostic – Bench Scientist	Discipline/Executive Management	Clinical Scientist
Diagnostic – Principal Scientist	Safety Quality & Risk	
Research	Learning & Development	
	Accreditation	

## Diagnostic Medical Scientist

Provides scientific oversight/leadership in a discipline in a public hospital laboratory. Provides diagnostic interpretive services, contributes to the review of quality performance and participates in quality assurance programs.

## Research Scientist

Utilises analytical skills within a dedicated area of scientific research outside, but may be affiliated with, public hospitals.

# Medical Laboratory Scientist Pathways

## **Multidisciplinary Scientist**

Works across multiple pathology disciplines and are critical for the operation and management of laboratories in regional and remote communities facing the largest workforce challenges.

## **Management Medical Scientist**

Manages staff and laboratories or specialised support areas. Their experience and knowledge contributes to the running of laboratories and organisations, ensuring high quality patient care and scientific excellence.

## **Clinical Scientist**

Undertakes a senior scientific role within a discipline's team of clinical pathologists and makes a significant contribution to the provision of diagnostic interpretive services and clinical liaison. Clinical Scientists provide a senior leadership role in the planning and coordination of discipline-specific education and scientific communication and contribute to the review of quality performance via liaison with laboratories to address quality issues.