

MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT HĪKINA WHAKATUTUKI



Feedback form – design options for seasonal visas

This template accompanies consultation material on options for the design of two *Seasonal Visas*. Please use this form if you would like to provide further comments in addition to feedback provided during meetings with the Ministry of Business, Innovation and Employment (MBIE).

Written feedback is due by **5pm 9 May 2025**. Email your submission to: <u>melody.nixon@mbie.govt.nz</u> and <u>sebastian.solomann@mbie.govt.nz</u>

Use of information

Release of information

MBIE may refer to submissions or parts of submissions in any summary of submissions.

By making a submission, MBIE will consider that you have consented to the release of your submission in full, unless you clearly specify otherwise.

If you do not wish for certain information in your submission to be released, please tick the relevant boxes below and provide further detail about the parts you consider should be withheld, and reasons for withholding.

MBIE will take such objections into account and will consult with submitters when responding to requests under the Official Information Act 1982.

Private information

The Privacy Act 2020 establishes certain principles with respect to the collection, use and disclosure of information about individuals by various agencies, including MBIE.

Any personal information you supply to MBIE in the course of making a submission will only be used for the purpose of assisting in the development of policy advice in relation to this review. Your personal information or any other identifiable information will only be published where we have sought and received your consent to do so.

Submitter details

Name	Gregory Thomas	
Email address	greg.thomas@tia.org.nz	
Phone number	021430435	
Name of business or organisation you are submitting on behalf of	Tourism Industry Aoteroa	
Privacy	Please tick this box if you do not wish your name or contact details above to be included in any information about submissions that MBIE may publish	
Do you have any objection to the release of any information provided?	No Yes: If yes, please indicate which parts you consider should be withheld, together with the reasons for withholding the information.	

9 May 2025



Design options for two Seasonal Visas: TIA Background Information

Tourism Industry Aotearoa (TIA) welcomes the opportunity to provide feedback on the options for the design of two seasonal visas.

TIA supports the development of the tourism workforce in Aotearoa New Zealand while recognising the essential role of overseas workers where there are skill shortages and where there are few New Zealanders ready and available for the work required.

Tourism Industry Aotearoa

TIA is the leading body for New Zealand's tourism industry, representing over 1,200 members across a wide array of tourism-related sectors. These include accommodation, adventure activities, attractions, retail, transport, airports, airlines, and other tourism services.

TIA is deeply committed to ensuring that tourism provides quality employment, as the interaction between visitors and workers is a key component of creating safe, memorable, and high-value experiences. The tourism workforce is diverse, spanning various sectors, skill levels, and locations, and contributes significantly to the overall success of the industry.

Workforce and Tourism 2050

TIA's strategy for a sustainable tourism future is outlined in *Tourism 2050 – A Blueprint for Impact, He Pae Tukutuku*. This framework envisions "Enriching Aotearoa New Zealand through a flourishing tourism ecosystem" that benefits New Zealand economically, socially, and environmentally.

Tourism 2050 has ten actions that are the most important strategic workstreams to advance to enable the industry to achieve its Vision. One of the ten actions is to 'Grow the Tourism Workforce' which includes:

- Expanding the workforce to match the industry's growth.
- Enhancing the skills and productivity of tourism workers to elevate the industry's standards and ensure world-class visitor experiences.

Ensuring that the right people are working in the right roles is key to maintaining the quality and reputation of New Zealand's tourism industry, as well as the way it cares for our natural and cultural heritage.

Tourism is a social industry where interactions between visitors and tourism workers are central to the overall visitor experience. A flexible and diverse workforce is essential to the sector's success, as tourism demand fluctuates based on seasonally driven factors and activities. Most tourism businesses are small to medium-sized enterprises (SMEs) and losing workforce flexibility can severely impact their ability to operate efficiently and meet visitor expectations.

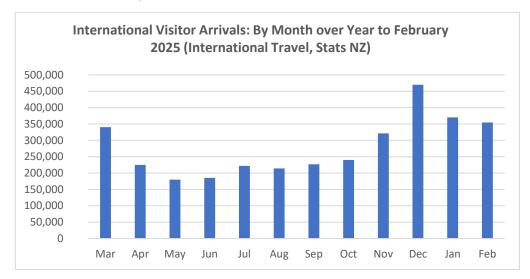
Every effort is needed to ensure that this labour market for tourism can operate effectively and flexibly so operators can ensure they have the right people with the right skills when and where they need them. This is a fundamental requirement of the industry.

Key workforce challenges for tourism businesses include:

• **Staff shortages**: Lack of staff is consistently cited as a significant issue, alongside rising costs, staff retention, burnout, weather challenges, and maintaining quality standards.

 Diverse skills and roles: The industry requires a wide range of skills across various locations, often needing staff to work irregular hours and on a seasonal basis. This makes it difficult to source enough domestic workers especially over peak seasonal periods, therefore increasing reliance on overseas workers over peak periods and/or in remote areas.

The figure below shows the extent of seasonal variation across one year. This highlights the higher arrival levels over the summer season, which are substantially larger than the shoulder and winter seasons. As an industry, tourism needs to be able to flex to meet these variable seasonal demand patterns.



Tourism workforce

The tourism industry is a significant employer in New Zealand, with international and domestic visitor activity supporting 303,420 jobs, of which 182,727 are directly employed by tourism and 120,693 indirectly¹.

Of the direct employment, this is spread across a wide range of sectors, highlighting the diversity of roles within the industry. The latest category breakdown from Stats NZ's most recent data for direct tourism employment by sector is as follows:

Number Employed	Category
16,455	Accommodation
47,928	Hospitality
3,258	Land transport
9,654	Air transport
7,020	Transport, travel and tour services
3,444	Rental and hiring services
6,237	Arts and recreation services
25,257	Retail trade
11,499	Education and training
30,252	Non-tourism related industries
160,998	Total Directly Employed (YE Match 2023 – latest data with this breakdown hence the different total than that above)

Within each tourism sector, there is significant occupational diversity. For example, in the hotel industry alone, a variety of roles are essential for day-to-day operations, including:

¹ Stats NZ, Tourism Satellite Account YE March 2024

front of house staff, chefs, restaurant staff, restaurant managers, wait staff, cleaners, retail, security, various management layers, marketing staff, reservation system staff, property managers, and many more.

Of the 182,727 people who are directly employed in the tourism industry in 2024, around 230 arrived on an approved AEWV in the tourism sector and around 6,200 to work in the hospitality sector. According to the StatsNZ Tourism Satellite Account, 23% of hospitality jobs are due to tourism demand, meaning that 1,426 of AEWV hospitality arrivals are tourism related. As such, the total tourism jobs arriving on AEWV last year was 1,656 which equates to less than 1% of the total workforce. The total number of tourism related AEWV employees will be around 2% to 3% considering those employees on their second or third year in the country.

Current state of the tourism workforce

TIA conducts regular workforce surveys to understand the state of tourism workforce in New Zealand. Around 300 businesses respond to each survey, which enables a clear understanding on the impact of workforce shortages and businesses' readiness for upcoming season. It also provides insight into how the AEWV scheme is working for tourism businesses.

The results of the September 2024 workforce survey have a focus on recruitment, staff development and benefits, immigration and the outlook.

Recruitment

- 47% of tourism organisations were recruiting for staff. The primary job openings include customer service, housekeeping and food & beverage attendants. The number of organisations recruiting has steadily decreased since June 2022, where 75% of organisations were actively recruiting.
- There were more job vacancies for entry level roles (44%), than mid-level (37%) and skilled roles (17%).
- 80% of tourism organisations had either recruited or attempted to recruit in the past year.
- 43% of businesses identified a shortage of quality applications as their primary recruitment challenge.

Outlook for workforce and business confidence

- It was a very tough winter period for tourism businesses, however 75% of tourism organisations managed to retain their staff over that period and into summer.
- At the time 75% of organisations were feeling optimistic about business over the next 12 months. The primary challenge facing tourism organisations in the next 12 months is the increase in costs and pricing. Additional concerns include weather related challenges, cashflow management and effectively managing staff wellbeing and retention.
- 73% of tourism businesses intend to hire additional staff within the next three years, with the majority needing to fill 1 to 5 FTE.
- 77% of business are confident in their ability to attract and retain the necessary staff to effectively run their business in the next 3 years.

Feedback on the proposed AEWV changes

Overview

How you feel the overall design of the Global Workforce Seasonal Visa (GWSV) and the Surge Capacity Seasonal Visa (SCSV) supports the objectives.

Any alternative or additional conditions or requirements you'd like to suggest

Tourism Industry Aotearoa (TIA) supports the Government's proposal to develop two new seasonal visa pathways – the Global Workforce Seasonal Visa (GWSV) and the Surge Capacity Seasonal Visa (SCSV).

We agree that the current Accredited Employer Work Visa (AEWV) settings are not well suited to short-term, high-volume roles that are critical to tourism and hospitality during defined seasonal peaks. The introduction of dedicated seasonal visas could significantly improve the ability of tourism businesses to plan and meet operational needs across summer and winter seasons.

TIA recognises the potential value of the GWSV for sectors such as ski and marine tourism, where experienced international workers often return year after year to fill specialist seasonal roles. We note strong support from these sectors for the overall concept of the GWSV as a more appropriate mechanism than the standard AEWV, which has been administratively burdensome and not flexible for seasonal needs. The SCSV will also be very helpful for businesses responding to seasonally-drive capacity needs where specific skills are required.

However, the proposed eligibility criteria for both the GWSV and SCSV are limited in recognising the operational realities of tourism, including those sectors that are important components of it, such as the hospitality and accommodation sectors.

Specifically, the requirement that seasonal roles be both *regionally based* and linked to *biological, weather, or climate-related seasonality* creates barriers in ensuring that these seasonal visas will work well for tourism.

Many tourism businesses, including those located in high population urban areas, experience well-defined peaks based on seasonal factors where the summer season related to other demand drivers such as summer-based events, timing of school holidays and the like which are linked to seasonal weather. TIA's point is that tourism in urban areas face generally the same seasonal fluctuations as regionally based destinations.

TIA recommends that Immigration New Zealand broaden and clarify the seasonal criteria to reflect a how seasonal demand operates in tourism. This should include:

- Recognising demand-driven peaks which are also linked to the summer season and periods of high visitor demand or operational peaks, rather than just to biological or weather-related factors.
- Removing or softening the requirement for roles to be located exclusively in non-urban (regional) areas.

TIA also wants to ensure the visas are affordable for both employers and workers. For many, seasonal roles visa costs are a key factor in the feasibility of hiring offshore workers. This is especially the case where return employees are involved, as the costs may outweigh the benefits of their short-term employment. We would support a lower fee structure for seasonal visas, proportionate to the shorter duration and the earning potential of such roles.

From an operational perspective, TIA members also raised concerns around the proposed pastoral care and/or minimum wage +10% requirements. While 65% of tourism businesses pay the living wage along with many employee benefits, these proposed obligations could create an imbalance between migrant and domestic employees. The requirements must be practical and proportionate to the scale of seasonal operations.

Global Workforce Seasonal Visa – visa conditions and employer requirements (slide 7)

Do you support having no maximum continuous stay for this visa, and why/why not?

Whether you think people on this visa would use the ability to transition to another visa?

Any other thoughts you have on these settings

TIA supports the proposed no maximum continuous stay for the GWSV. This would enable experienced seasonal workers to return each year without having to reapply. For many tourism roles, employers rely on returning staff who bring valuable skills and familiarity with the operating environment. Greater continuity in visa eligibility helps provide a stable, efficient seasonal workforce.

We expect that some visa holders will take up the option to transition from the GWSV to the AEWV. This pathway would be useful for workers who wish to take on longer-term roles in the industry. Enabling this type of transition supports ongoing staff development and retention, which is important for businesses looking to hold onto high-performing seasonal staff across multiple years.

We anticipate there will be some level of movement between the GWSV and SCSV, as well as from seasonal to standard AEWVs, depending on the nature of the work and the time of year. In many parts of the industry, seasonal staff may work across both winter and summer roles, with gaps between assignments. For example, ski field workers may transition into summer guiding roles, or drivers may shift between alpine and urban transport operations. This is not expected to be significant in number but is an important consideration.

We recommend that INZ consider how the visa settings will accommodate short gaps between roles or employers. In tourism, it's common for businesses to operate within fixed seasonal windows—such as June to October for ski fields and there may be breaks between contracts. Providing flexibility—such as allowing brief periods of unpaid leave by mutual agreement, or introducing a form of interim visa—would help reduce administrative complexity for employers and provide more certainty for workers.

	TIA also supports visa settings that allow movement between approved employers or roles within a season. Many tourism workers bring transferable skills, and flexibility to shift between roles—especially in areas with overlapping seasonal demand.		
Clab	al Workforce Seasonal Visa - role requirements (slides 8 and 9)		
GIOD	ai workforce Seasonal Visa - role requirements (sildes 8 and 9)		
	Views on the proposed criteria that an occupation must meet to be added to the list of roles that can access this visa		
	TIA supports the intent to limit the GWSV to roles that are genuinely seasonal and face ongoing skills shortages. However, we believe the current proposed criteria are too narrowly defined and do not reflect the reality of many roles within the tourism industry. In particular:		
	 The requirement that seasonality must relate to weather, climate, or biological factors excludes many key roles, including in accommodation, food and beverage, guest services, guiding and many other sub areas of tourism. These roles are tied to visitor demand patterns that are predictable and seasonal and these need to be factored into the design of these seasonal visas. 		
	 The requirement that roles must be located outside urban centres does not reflect how tourism operates in practice. Many of New Zealand's key visitor destinations such as Rotorua, Queenstown and Taupō, contain urban areas but are some of the locations that experience the most acute seasonal labour shortages. 		
	We recommend MBIE broaden the seasonal definition to include demand peaks driven by visitor flows, such as school holidays, public holidays, and the summ travel period.		
	And we recommend that the nature of the seasonal roles in tourism should not be limited to regionally based areas.		
	Occupations that you believe meet the proposed criteria, with supporting evidence including:		
	 How long these roles are needed for and how it relates to a weather, climate or biologic factor 		
	\circ Where the majority of these roles are based		
	 Estimated volumes of migrants recruited in these roles generally, and how many return year-on-year What skills and experience are needed for these roles, and the availability of these skillsets domestically 		
	Below are the roles TIA would like to see included. In terms of the estimated volumes and supporting evidence please see submissions from individual operator submissions from the tourism industry including Hotel Council Aotearoa, Real NZ and the Ski Areas Association.		

ANZSCO Number	Descriptor	Position
431112	Barista	Barista
431211	Cafe Worker	Café Assistant
351311	Chef	Chef, Sous Chef, Outlet Head Chef / Chef, Sous Chef, Chef De Partie, Commis Chef, Demi Chef
351411	Cook	Cook
241111	Early Childhood (Pre-primary School) Teacher	NZ Registered Childcare Teacher
431511	Waiter	Outlet Manager, Duty Manager / Host, F&B Attendant
851311	Kitchenhand	Kitchenhand
452299	Outdoor Adventure Guides nec	Patrol
721999	Mobile Plant Operators nec	Snow Groomer (various variations to name)
399999	Technicians and Trades Workers nec	Workshop Technician
452314	Snowsport Instructor	Instructor, Coach, Trainer / Snowsports School Supervisor
712999	Snow Maker	Snowmaker, Snowmaking 2IC
712111	Crane, Hoist or Lift Operator	Lift Operator/Attendant
731212	Charter and Tour Bus Driver	Driver (Class 2+)
452217	Whitewater Rafting Guide	Raft Guide, Senior Raft Guide, Trip Leader, Safety Kayaker
451412	Tour Guide	Crew, Experience Crew Guide

(If known) what is the contracting model used for suggested seasonal occupations?

Seasonal contracts are commonly used and typically renewed each year for returning staff. This may differ in the hotel sector, and further clarification would be useful to ensure contracting models are appropriately accounted for across tourism sub-sectors.

Views on a Labour Market Test exemption for this visa

We support an exemption from the Labour Market Test (LMT) for roles under this visa. Employers in the tourism sector consistently provide evidence to Immigration New Zealand that certain seasonal roles cannot be filled locally. The LMT process in these cases is often a formality with a predictable outcome, and exemption would reduce unnecessary administrative burden.

We also note that contracts for service are likely to deter potential workers. Requiring migrants to act as sole traders and manage their own tax obligations adds complexity, especially for those in New Zealand for a short time. If this model is introduced, we recommend that workers be given the choice between a contract for service or a standard employment agreement.

Global Workforce Seasonal Visa – migrant requirements (slide 10)

Whether three seasons of experience (tailored to the specific season) is on par with people being recruited for these roles?

TIA supports seasonal experience as the basis for eligibility, rather than accumulated experience over full calendar years. However, the "three season" proposal is too rigid and doesn't reflect the potential for transferrable skills from other non-seasonal roles. A "two seasons" threshold is a more realistic and fair measure of experience..

Many workers in our sector first enter New Zealand on a Working Holiday Visa (WHV), and employers invest in training and developing them during their initial season. These individuals may then work a second season overseas before seeking to return. Under the current proposal, they would not be eligible despite having the skills and experience needed. Two seasons of relevant experience - domestic or international - should be considered equivalent to the AEWV's two-year requirement, especially given the seasonal nature of our industry.

We also request that the policy confirm that international experience is acceptable for meeting the experience threshold. AEWV applicants have previously encountered uncertainty in this area, so clear guidance would be helpful.

Views on the requirement to meet all other AEWV applicant requirements, including the IELTS Level 4 English language standard

TIA agrees that applicants should meet general AEWV requirements. However, we do not support a mandatory English language testing requirement - particularly in the form of IELTS Level 4 - for seasonal visa applicants.

While good English communication is important in many roles, the formal IELTS process can be a barrier. Migrants often face issues accessing a test centre, and the cost is prohibitive for those coming for short-term seasonal work. We believe that language proficiency should be assessed by the employer, based on the actual communication needs of the role. Many seasonal workers perform their jobs effectively with limited English or are specifically employed for their fluency in another language.

If a language requirement is to be retained, we recommend developing a lowercost, government-delivered module, such as the e-learning platform already used for AEWV modules. This would provide a consistent minimum standard without adding unnecessary financial or logistical burdens to applicants.

TIA supports a seasonal approach to recognising experience and welcomes a more realistic pathway for skilled seasonal workers to return to New Zealand.

Surge Capacity Seasonal Visa – visa conditions and employer requirements (slide 12)

Views on the requirement to have a four-month stand-down (noting applications will be able to be lodged for the next season before the stand-down is completed)

Whether you think people on this visa would use the ability to transition to another visa?

Any other thoughts you have on these settings

TIA supports the intent behind the proposed 7-month duration for the SCSV as it reinforces the seasonal nature of the roles it is intended to support.

We also agree that the ability to transition to another visa - such as an AEWV - should be retained, as this provides important flexibility for employers wishing to retain high-performing seasonal workers. However, it is important that employers are able to lodge new applications or initiate transitions before the stand-down period concludes to support business continuity and workforce planning.

We support the inclusion of a four-month stand-down period but also propose that this restriction apply only to the employer, not the country. We don't think the migrant should be prohibited from remaining in or working elsewhere in New Zealand. This would help ensure the visa remains seasonal in nature without forcing skilled workers to exit the country during other industries' peak demand periods.

Requiring a migrant to leave New Zealand when they could contribute to another sector's seasonal labour needs is inefficient. In tourism and hospitality, many roles - particularly lower-skilled positions such as front-of-house attendants - require flexibility to meet workforce gaps that arise at different times of year. If a locally established migrant on an SCSV is forced to leave, the only other options would be international recruitment or limited WHV availability, even if the individual is willing and able to fill an immediate need.

During a single season, workers may seek to move between roles or employers, particularly where sectors have overlapping operational calendars. Allowing some flexibility within the visa settings to enable this mobility would contribute to a more responsive and efficient seasonal workforce, without undermining the visa's seasonal intent.

Surge Capacity Seasonal Visa – role requirements (slides 13 and 14)

Views on the proposed criteria that an occupation must meet to be added to the list of roles that can access this visa.

Occupations that you believe meet the proposed criteria, with supporting evidence including:

 How long these roles are needed for and how it relates to a weather, climate or biologic factor

- Where the majority of these roles are based
- Estimated volumes of migrants recruited in these roles generally
- What skills and experience are needed for these roles, and the availability of these skillsets domestically

Views on the proposed alternative to the Labour Market Test, including:

- What you see as the benefits of the employer endorsement approach (compared to the standard Labour Market Test)
- (If appropriate) whether employers you represent would use the endorsement model
- The proposed workforce plan requirements, and other common elements of workforce plans in your sector

The proposed criteria for the SCSV do not extend to many tourism, hospitality and accommodation roles where shortages exist. These roles also experience seasonal surges in demand and we propose recommend adjusting the criteria to reflect the seasonality and peaks that exist within tourism.

As above with the GWSV the occupations should include the following and TIA also refers to submissions from tourism operators including Real NZ, Ski Areas Association and Hotel Council Aotearoa.

ANZSCO Number	Descriptor	Position(s)
431112	Barista	Barista
431211	Cafe Worker	Café Assistant
351311	Chef	Chef, Sous Chef, Outlet Head
		Chef / Chef, Sous Chef, Chef
		De Partie, Commis Chef,
		Demi Chef
351411	Cook	Cook
241111	Early Childhood (Pre-primary	NZ Registered Childcare
	School) Teacher	Teacher
431511	Waiter	Outlet Manager, Duty
		Manager / Host, F&B
		Attendant
851311	Kitchenhand	Kitchenhand
452299	Outdoor Adventure Guides	Patrol
	nec	
721999	Mobile Plant Operators nec	Snow Groomer (various
		variations to name)
399999	Technicians and Trades	Workshop Technician
	Workers nec	
452314	Snowsport Instructor	Instructor, Coach, Trainer /
		Snowsports School
		Supervisor
712999	Snow Maker	Snowmaker, Snowmaking 2IC
712111	Crane, Hoist or Lift Operator	Lift Operator/Attendant
731212	Charter and Tour Bus Driver	Driver (Class 2+)

452217	Whitewater Rafting Guide	Raft Guide, Senior Raft Guide, Trip Leader, Safety Kayaker
451412	Tour Guide	Crew, Experience Crew Guide

There is inconsistency in the proposal to remove the LMT for the GWSV, but not for the SCSV. Both visas are intended to address roles with persistent seasonal labour shortages, and it is unclear why a different standard would apply. We recommend that the LMT approach be consistent across both visa types.

We do not support replacing the standard LMT with an employer endorsement model that relies on workforce planning documents or additional commitments. The current LMT process used under the AEWV is well-established, clearly understood by employers, and supported by a defined framework. Replacing it with a new process may introduce unnecessary complexity, particularly for small and seasonal operators.

While we understand the intention behind the proposed endorsement model, our experience suggests that workforce planning obligations and initiatives to reduce reliance on migrant labour have limited effectiveness in a seasonal context. Many of our members already invest heavily in domestic recruitment through financial incentives, training and onboarding, and entry-level skill development designed to upskill local workers. These initiatives help, but they have not been sufficient to consistently meet labour requirements during seasonal peaks.

The reality is that many New Zealanders prefer the certainty of permanent, year-round employment and as such the domestic seasonal labour pool remains constrained despite employers' best efforts. This means the requirement to demonstrate declining reliance on migrant workers over time may be difficult to meet and risks becoming a compliance exercise rather than a meaningful workforce strategy.

We are also concerned that the proposed endorsement model would shift additional administrative burden to both employers and agencies such as MSD, at odds with the government's intention to reduce red tape.

TIA would be open to a modified endorsement model, provided employers retain control over assessing applicant suitability for specific roles, and that any changes are designed to streamline rather than complicate the process. However, on balance, we support continuing with the standardised Labour Market Test as the preferred and more practical mechanism.

Surge Capacity Seasonal Visa – employer or role requirement (slide 15)

What are the pastoral needs of seasonal workers?

What pastoral care are employers already providing?

On the need for pastoral care obligations, and any preference between the options indicated

Suggestions of alternative obligations that could be considered

TIA does not support the proposal to introduce a minimum wage +10% requirement and does not support the proposed pastoral care obligations.

A blanket uplift risks inflating wages for lower-skilled seasonal roles. This may result in wage settings that are misaligned with local labour market conditions, creating pressure for employers in already tight margin sectors and inequity between domestic and migrant staff.

The proposed pastoral care obligations could impose a significant and unjustified cost burden on seasonal employers. For some of our members, this would affect over 1,000 employees across summer and winter seasons.

Suggested requirements, such as subsidising private health insurance and paying an accommodation supplement, would be highly disruptive. These benefits are typically only provided to permanent staff and extending them to seasonal workers would be financially unsustainable.

More broadly, mandating additional entitlements for migrant workers risks creating inequities between domestic and migrant staff. If employers are required to provide housing support or health cover for one group and not the other, this may create internal tensions, perceptions of unfairness, and unintended compliance risks under employment law.

Approaches to pastoral care differ depending on employer size and capacity. Larger operators often voluntarily provide benefits such as subsidised transport, discounted food, and access to healthcare services. We support the ability of businesses to offer these as optional incentives, but do not believe they should be mandated through visa policy. Seasonal work arrangements should remain flexible and scalable, and employers should not be expected to take on responsibilities traditionally covered by public services or long-term employment contracts.

We recommend removing the proposed wage and pastoral care requirements, or at a minimum ensuring that any such expectations are aligned with AEWV settings and remain voluntary in line with what employers may already provide to their employees.

Surge Capacity Seasonal Visa – migrant requirements (slides 16 and 17)

What degree of experience of you usually look for in people that you might recruit for surge labour seasonal roles?

Views on the requirement to meet all other AEWV applicant requirements, including the IELTS Level 4 English language standard

TIA supports the proposed minimum experience threshold of one completed season for SCSV eligibility. This is a practical requirement that recognises the varied levels of experience needed across tourism roles. For many operational and lower-skilled roles, one season is sufficient to develop the basic skills and familiarity required to return successfully for future work.

Generally, we agree that SCSV applicants should meet the same baseline requirements as AEWV applicants. However, we reiterate our concern that the IELTS Level 4 English language standard presents an undue barrier for seasonal applicants. Many individuals who would perform well in seasonal roles already have functional English but struggle to access formal testing, either due to location, availability, or cost. Many are hired due to their ability to speak a foreign language. Employers should really be the best judge of their own English comprehension requirements or assessments.

Additional feedback

What other feedback do you have on these proposals?

There has been no mention of approximate costs of these Visas, but as the administrative requirements of these Visas should be lower, we would like to see the cost of these visas to be lower and reflect the shorter term, seasonal nature of these roles.

We'd also like to highlight the importance of reducing processing timeframes for seasonal visas. Delays currently impact both business operations and migrant wellbeing. We encourage Immigration NZ to consider exemptions or auto-approvals for roles with repeated job checks over multiple years, such as those in the ski sector. A streamlined renewal processes for returning migrants would reduce costs and improve retention.