

22 May 2008

Mr Andrew Metcalf  
Secretary  
Department of Immigration and Citizenship  
PO Box 25  
Belconnen ACT 2616

Dear Secretary

**Re: Temporary Skill Migration (457 Visa) Program Scheme**

Commerce Queensland has had the opportunity to review the recommendations of the 457 External Reference Group's Inquiry and the subsequent response by the Department of Immigration and Citizenship (DIAC).

Indeed the Chamber is pleased that the Federal Government has moved quickly to implement recommendations that are in the main widely supported by the State's business community.

A rapidly growing number of Queensland businesses have accessed skilled workers from overseas under the 457 visa scheme as means of addressing the chronic skill shortages that exists across the State.

Commerce Queensland wishes to highlight a number of issues in relation to the recommendations and the Department's response which we believe must be addressed in order to ensure that the 457 visa scheme can operate efficiently within Queensland from July 2008.

Commerce Queensland has several reservations over the measures put in place for streamlining the application and approval processes and for eliminating duplication and unnecessary administration.

More specifically the key measure to establish only in Sydney, Melbourne and Perth specialised teams or 'Centres of Excellence' to facilitate and process 457 visa applications has met with a mixed response from Queensland industry.

In our view this outcome creates concerns that through the absence of a centre in Queensland the objectives of making the 457 visa scheme more effective and responsive to industry needs in Queensland will be compromised.

Commerce Queensland will monitor closely this recommendation to gauge whether responsive servicing and a reduction in backlogs occurs for this State. The Chamber is keen to ascertain what measures can be put in place by the Department to ensure that employers in Queensland are not disadvantaged in any way through lack of an office in this State.

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Consideration will need to be given to enhancing communication avenues and to how the knowledge of Queensland regional specific issues will be provided to these Centres of Excellence. We are concerned that the actual number of DIAC staff with Queensland specific local knowledge will be considerably diminished.

What is clearly evident is that this initiative will dramatically increase the demand on the resources of the existing industry outreach officer in Queensland. Currently Queensland is in the unacceptable situation of having only one industry outreach officer with a vacancy in the regional outreach program. This compares poorly to the resourcing available in other States.

	<b>Industry Outreach Officers</b>	<b>Regional Outreach Officers</b>
South Australia	1	2
Western Australia	1	1
New South Wales	5	3
Victoria	3	2

Commerce Queensland is comforted by the adoption of the recommendation that the Department will expand its front-end support to employers and industry through its industry and regional outreach programs, with a focus on developing guidelines and training to help industry increase the proportion of 'decision ready' applications.

Commerce Queensland accordingly recommends that at least one additional industry outreach officer be engaged for Queensland and that the regional outreach officer position be immediately filled.

Finally Commerce Queensland in its submission to the External Reference Group argued extensively for the provision of non skilled labour to be included in the 457 visa scheme. Currently there are circumstances within Queensland where unskilled workers are unable to be accessed to meet labour needs. The Chamber is heartened by the Federal Government's statement that it will promote and encourage the wider use of Labour Agreements for larger projects that are in the national interest and that have significant economic benefit.

Commerce Queensland would be happy to expand upon the issues raised within this correspondence. Both myself and Nick Behrens State Manager – Policy on (07) 3842 2244 would be happy to answer any queries your Department may have.

These issues are of significant importance to the Queensland business community and I would welcome any advice that your Department can offer to address these concerns.

Yours sincerely

Paul Bidwell  
**General Manager – Policy and Membership**