

# SUBMISSION IN RESPONSE TO DISCUSSION PAPER ON REGIONAL MIGRATION SETTINGS

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JULY 2024

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Joint Submission of the Australian Hotels Association and  
Accommodation Australia

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# Summary of Recommendations

1. For most of the migration system, the term “regional” should mean all employment outside of the four large capital cities with the exception that for working holiday makers eligible regional work should be work outside of all capital cities and the Gold Coast, with the exception that Darwin should also be considered regional.
2. As the government implements its new approach to assessing skill needs for migration purposes, it is important to remember that the most responsive, efficient and successful system for temporary skilled migration was when employers could sponsor any skilled occupation provided that a skills gap could be identified without the necessity for national shortage assessment or complicated lists.
3. Responsiveness to regional migration needs should not be sacrificed for any perceived simplicity created by having one list. The occupations available to regional employers for sponsorship should reflect local and regional needs, with ideally all skilled occupations available, or at worst case, the maintenance of a regional occupation list that is more extensive than the proposed CSOL.
4. For those occupations that are not assessed as in shortage on a national basis, JSA should identify those that would satisfy the Migration Model criteria on a state or regional level and recommend that those skilled occupations in shortage in those regions be met through migration sponsorship via a regional occupation list.
5. To avoid significant economic consequences of removing temporary skilled migration sponsorship for occupations in shortage, there should be a transitional arrangement where occupations can be flagged for future review once data is available that will more accurately reflect migrant and employment outcomes of sponsored migrants in the new system.
6. Government should instruct the JSA to broaden its Migration Model to increase weighted importance of future skill needs and, in addition, include the measurement of the economic impact on industries and businesses if skill shortages cannot be addressed by migration.
7. The list of occupations available for permanent regional employer sponsored migration (RSMS visa) should be all skilled occupations or at least more extensive than the proposed CSOL in order to accommodate regional and state needs as well as occupations in shortage.
8. That the ability to seek a WHM visa for the second and third year continue, and that this be enabled through a minimum of 3 months working the regions in the year prior to seeking the extension visa
9. That specified work becomes known as “eligible regional work”, and that for the tourism and hospitality industries it is work in regions outside of the capital cities and the Gold Coast, with the exception that Darwin also be considered as regional work.
10. As a longer-term strategy, it may be more appropriate to ensure the PALM program is well designed for the agricultural industry and allow the WHM program, with its emphasis on travel and experience, to be more responsive to regional needs in the tourism & hospitality industry.
11. The Skilling Australians Fund Levy should be halved for all migration sponsorship, or at the very least, halved for all employers seeking to sponsor a permanent or temporary skilled migrant for regional work

# Introduction

The Australia Hotels Association (AHA) and Accommodation Australia (AA) welcome the opportunity to comment on the discussion paper on the review of regional migration settings, entitled *Supporting strong and sustainable regions* (discussion paper). The AHA represents more than 5,000 members across Australia, including hotels, pubs, taverns and bars, serviced by a network of branches based in every state and territory, plus a Canberra-based National Office. Accommodation Australia, as a division of the AHA, represents more than 1400 of those properties ranging from independent regional motels and caravan parks to the largest local and international hotel and resort groups.

This submission supports:

- access by regional employers to all, or at least most, skilled occupations for both permanent and temporary migration sponsorship even if this means retaining two occupation lists
- Improving responsiveness to regional needs by a better process in establishing and working within Designated Area Migration Agreements (DAMAs)
- the need for an ongoing regional work commitment for WHM to access second and third year visas but seeking that the definition of specified work for our industry be expanded to embrace all regions, not just remote.
- greater connection to our pacific neighbours including the exploration of a pilot under PALM to train apprentices in cooking.
- Using WHM and PALM in a complementary way that focuses on improving integrity and responding to the needs of different industries

This submission is made in the context of the AHA/AA recent response to Jobs & Skills Australia on the Draft Core Skills Occupation List (CSOL), as well as our earlier submission on the permanent migration 2024-25 planning levels, both of which are available on our [website](#). Specifically, a number of recommendations made to JSA in our submission on the CSOL have been carried across to this submission given their direct relevance to this review of regional migration settings.

A key theme throughout this submission is that regional employers find it difficult to attract and retain the skills and labour needed to ensure their businesses are sustainable and successful. This regional migration review provides the opportunity to improve the competitiveness of regional employers in a labour market by ensuring that regional migration settings are favourable and enable them to access the skills and labour required to meet their needs.

## Hotel and Accommodation Sectors

### Economic Contribution

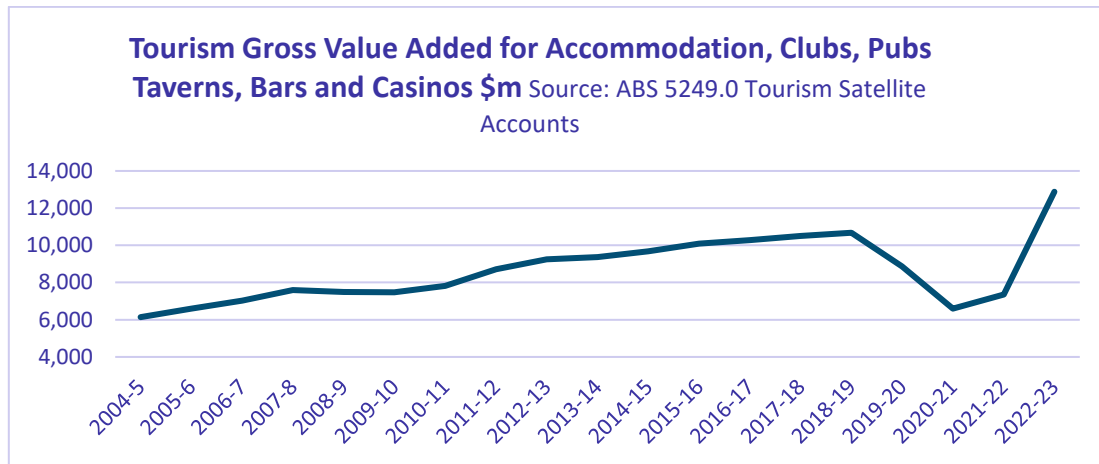
The hotel, pub and accommodation sectors represented by AHA and AA fall within the ABS-defined Accommodation and Foodservice industry (AFS - often termed “hospitality”). According to the ABS, the industry value-add (IVA) to the economy by the Accommodation and Food Service Industry in 2022-23 was \$60.36<sup>1</sup> billion (compared with \$45.7 billion in 2021-22) on revenue of \$141.2 billion. Wages and salaries paid by AFS employers in 2022-23 totalled over \$37 billion, with FBT paid \$44 million and payroll tax \$991 million, amounting to total labour costs of \$42.2 billion.

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<sup>1</sup> ABS, 81550DO001\_202223 Australian Industry, 2022-23 released on 31 May 2024.

According to the ABS Tourism Satellite accounts, for pre-COVID 2018-19 the gross value add to tourism by sectors represented by the AHA/AA, being accommodation, pubs, bars and casinos, was \$10.6 billion. As can be seen in Figure 1, the impact of COVID was profound, with the contribution to tourism dropping to a low point of \$6.6 billion in 2020-21, before recovering and then surpassing previous levels with \$12.9 billion in 2022-23, which is over 21% higher than pre-COVID level.

**Figure 1. Direct contribution to tourism by Accommodation, Clubs, Pubs, Taverns, Bars and Casinos**



## Employment

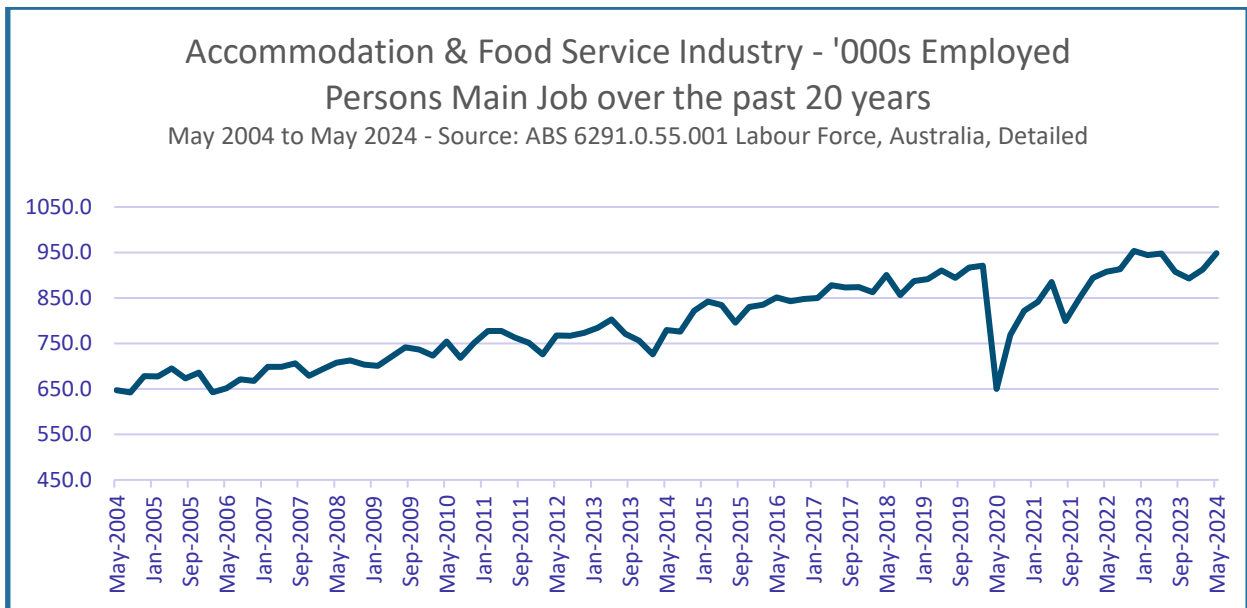
### Accommodation and Food Service Industry

As at May 2024, there were 948,400<sup>2</sup> people who identified that their main job was in the accommodation and food service industry, of which hotels, motels, pubs and taverns are a significant part. As Figure 2 shows, jobs growth over the last twenty years has been considerable, except for the dramatic fall during the COVID-19 pandemic.

It is important to note that this employment data underestimates the total number of people employed in the accommodation and food service industry as it categorises the labour force according to their main job. As there are many people who supplement their household income through a second job working in hospitality, the total number of employees who derive valuable income from our sector is much higher.

<sup>2</sup> ABS, 6291.0.55.001 Labour Force, Detailed, May 2024

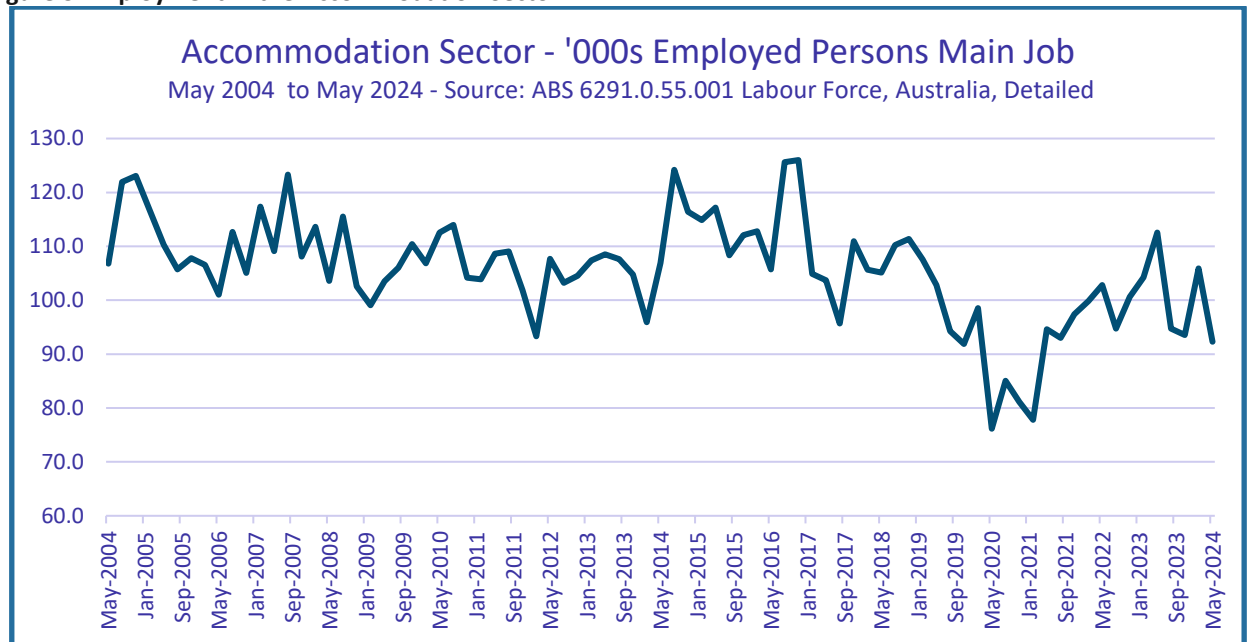
**Figure 2. Employment in the Accommodation and Food Service Industry**



**Accommodation Sector**

As a subset of the broader AFS industry, as at May 2024 (a traditional low point seasonally), there were 92,300<sup>3</sup> people who identified that their main job was in the accommodation sector, 56% of which were female. As Figure 3 shows, jobs growth during and post-pandemic in the accommodation sector has been mixed and employment levels are still over 20% below a pre-pandemic high of over 117,200 in May 2015 reflecting that job recovery in the accommodation sector remains incomplete. Due to difficulties recruiting labour and specialisations, there has also been an increasing trend for some accommodation properties to outsource some of their operations, notably housekeeping services, which would shift some sector-dependent jobs into other industry categories.

**Figure 3. Employment in the Accommodation Sector**



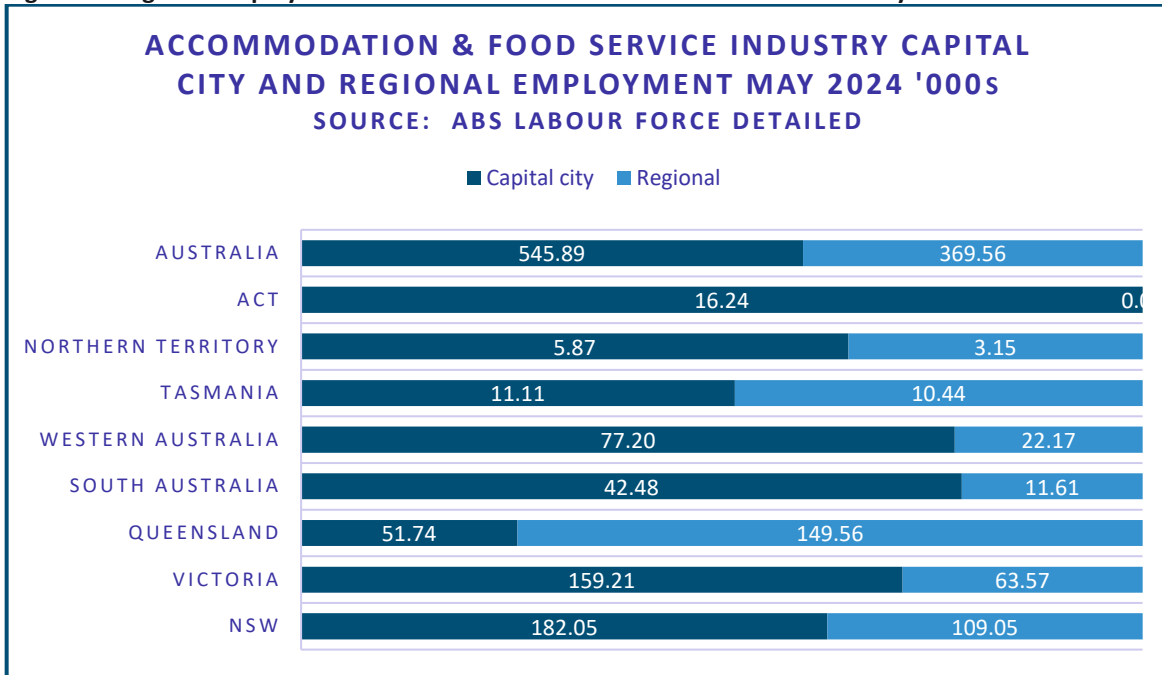
<sup>3</sup> ABS, 6291.0.55.001 Labour Force, Detailed, May 2024, stock Original (not seasonally adjusted)



## Regional employment

In the accommodation and food service industry, 40%<sup>4</sup> of all jobs are outside of the capital cities (42% if Darwin and Hobart are counted as regional). As Figure 4 illustrates, Queensland has by far the largest percentage of regional employment, with almost 150,000 people (or 74.3% of the State's AFS total) employed in jobs in the AFS industry outside of Brisbane. In fact, regional AFS jobs in Queensland account for over 15% of all Australian AFS jobs, reflecting the decentralisation of population and work in that State, as well as its economic dependence on tourism and hospitality. Overall, Figure 4 demonstrates the geographic spread of the industry across Australia, and the need for workers across all regions.

**Figure 4. Regional employment in the Accommodation and Food Service Industry**



## Employment projections

Jobs & Skills Australia data has commissioned Victoria University to undertake employment projections to 2033 for industries and occupations. As Table 1 shows, the Accommodation and Food Services (AFS) industry is predicted to grow by 59,400 jobs or 6.3% over the five years to May 2028, with 118,100 additional jobs in the ten years to May 2033. The accommodation sector is predicted to grow faster than the AFS average, at 17.1% over 10 years compared to the AFS average of 12.5%.

<sup>4</sup> ABS, 6291.0.55.001 RQ1, Labour Force, Detailed, May 2024, labour Market regional data

**Table 1. JSA Employment Projections for AFS, Pubs and Accommodation**

Industry Employment	Employment -	Projected	Projected	Projected 5 yr growth		Projected 10 yr growth	
	May 2023 ('000)	employment May 2028	employment May 2033	('000)	(%)	('000)	(%)
<b>Accommodation and Food Services</b>	<b>945.0</b>	<b>1004.4</b>	<b>1063.1</b>	<b>59.4</b>	<b>6.3%</b>	<b>118.1</b>	<b>12.5%</b>
Accommodation	105.5	113.9	123.5	8.4	8.0%	18.0	17.1%
Pubs, Taverns and Bars	100.5	106.8	112.8	6.3	6.3%	12.3	12.2%

As shown in Table 2, growth projections for key occupations in hospitality are also robust, with the number reliant on the food trades career pathway rising from 201,300 in May 2023 to over 227,000 by 2033. This is a net increase of 26,000 chefs and cooks over the next ten years. Importantly, the training need is much greater as this is a conservative estimate of the net increase, and with attrition rates, the number of chefs needed to be trained will be much higher. It is also unlikely that the Victorian University model has taken into account the federal government’s Thrive 2030 tourism growth projections, illustrating the limitations created when government strategies and economic modelling do not connect.

**Table 2. JSA Employment Projections for key roles**

Employment by Occupation	Employment -	Projected	Projected	Projected 5 yr growth		Projected 10 yr growth	
	May 2023 ('000)	employment May 2028	employment May 2033	('000)	(%)	('000)	(%)
<b>Food Trades Workers</b>	<b>201.3</b>	<b>215.0</b>	<b>227.6</b>	<b>13.7</b>	<b>6.8%</b>	<b>26.3</b>	<b>13.1%</b>
Chefs	119.7	128.8	136.8	9.1	7.6%	17.1	14.3%
Cooks	38.3	41.1	43.6	2.8	7.2%	5.3	13.9%
Bakers and Pastrycooks	29.0	30.3	31.7	1.3	4.5%	2.7	9.3%
<b>Hospitality Workers</b>	<b>304.9</b>	<b>326.4</b>	<b>344.8</b>	<b>21.4</b>	<b>7.0%</b>	<b>39.8</b>	<b>13.1%</b>
Waiters	132.3	141.6	149.6	9.4	7.1%	17.4	13.1%
Bar Attendants and Baristas	111.5	119.3	125.9	7.8	7.0%	14.4	12.9%
Cafe Workers	32.7	34.9	36.8	2.2	6.7%	4.1	12.5%
Hotel Service Mgrs (Exec Housekeeper)	9.1	9.9	10.6	0.8	8.5%	1.5	16.3%
Gaming Workers	5.9	6.3	6.6	0.4	6.7%	0.7	12.5%
<b>Food Preparation Assistants</b>	<b>209.6</b>	<b>220.1</b>	<b>232.8</b>	<b>10.5</b>	<b>5.0%</b>	<b>23.2</b>	<b>11.1%</b>
Fast Food Cooks	54.1	56.6	59.5	2.5	4.7%	5.4	10.0%
Food Trades Assistants	6.0	6.1	6.3	0.1	1.9%	0.4	6.1%
Kitchenhands	148.2	156.1	165.5	7.8	5.3%	17.3	11.7%
<b>Accommodation and Hospitality Managers</b>	<b>107.8</b>	<b>113.2</b>	<b>120.5</b>	<b>5.4</b>	<b>5.0%</b>	<b>12.7</b>	<b>11.8%</b>
Cafe and Restaurant Managers	64.7	67.6	71.6	2.9	4.4%	6.9	10.6%
Hotel and Motel Managers	22.6	23.9	25.5	1.3	5.7%	3.0	13.1%
Other Accommodation and Hospitality Mgrs	8.9	9.5	10.4	0.6	7.0%	1.5	16.5%
Caravan Park and Camping Ground Managers	4.3	4.6	5.0	0.3	6.9%	0.7	15.7%
<b>Accommodation workers</b>							
Housekeepers	31.1	32.0	34.4	0.9	2.9%	3.3	10.7%
Receptionists (not just AFS)	187.0	192.6	209.7	5.5	3.0%	22.6	12.1%



# Importance of regional migration

The discussion paper provides a valuable framing for an important discussion about regional migration, commencing with the fundamental point that the regions underpin much of Australia's economic wealth, including in farming, mining and tourism. It also points out that tourism, of which the hotels and accommodation sector play a key role, contributes at least 20% of Gross Regional Product in some regions.<sup>5</sup>

Importantly, the discussion paper highlights the concern that is also raised by our members that many regional employers are finding it difficult to meet their workforce needs, both in terms of labour and skills. A responsive migration system is critically important in assisting employers in the regions meet their skill and labour needs so that their businesses can be sustainable, productive and grow.

In this review of regional migration settings, there is an opportunity to make a positive difference by ensuring that employing and working in the regions is as attractive, if not more so, than in the capital cities. In this way migration can assist the regions become more competitive in a battle for labour and skills, and thus overcoming what can often be a competitive disadvantage in attracting and retaining a suitable workforce. This can be achieved by putting in place settings that are as responsive as possible to regional needs – needs which can vary according to the local economic and social fabric of each community.

One of the issues raised in the discussion paper is the definition of what is “regional”. In the migration system alone, the term regional is defined differently. The definition (s) that the government finalises as a result of this regional migration review will depend on what setting differentials are put in place. No current region, including cities such as Adelaide, wants to lose benefits that currently exist in the system.

Therefore, although ideally there should only be one definition of regional for simplicity. the current broader definition of regional that exists for part of the program should generally be retained, except for eligible work for working holiday makers where regional should be outside of all capital cities and the large population centre of the Gold Coast, with the exception that working in Darwin would be eligible.

## **Recommendation:**

- 1. For most of the migration system, the term “regional” should mean all employment outside of the four large capital cities with the exception that for working holiday makers eligible regional work should be work outside of all capital cities and the Gold Coast, with the exception that Darwin should also be considered regional.*

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<sup>5</sup> Australian Government, *Supporting strong and sustainable regions*, Discussion Paper June 2024, page 3.

# Key Policy Issues

To achieve a responsive regional migration program, there are a number of key policies which are important to the hotel and accommodation sector including:

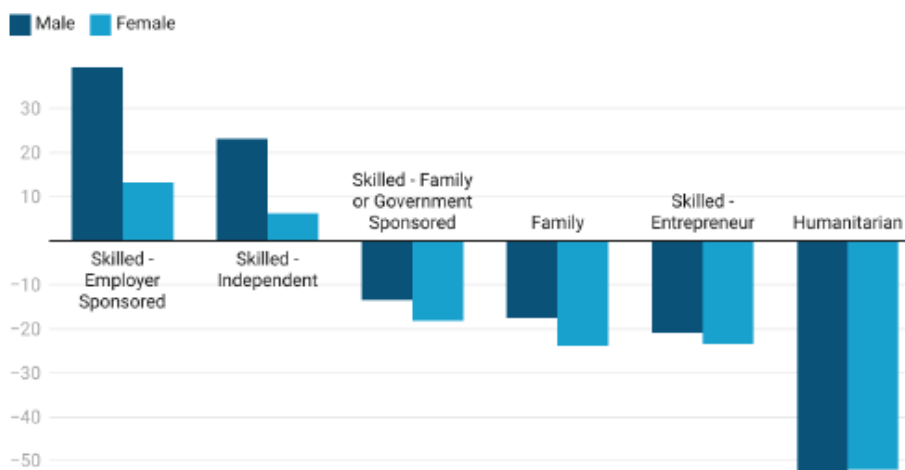
- seeking access by regional employers to all, or at least most, skilled occupations for both permanent and temporary migration sponsorship even if this means retaining two lists
- Improving responsiveness to regional needs by a better process in establishing and working within Designated Area Migration Agreements (DAMAs)
- Ensuring TSMIT works for regional jobs
- the need for an ongoing regional work commitment for WHM to access second and third year visas but asking that the definition of specified work for our industry be expanded to embrace all regions, not just remote.
- supporting greater connection to our pacific neighbours by potentially trialing apprenticeship opportunities in cooking.
- Using WHM and PALM in a complementary way that focuses on improving integrity and responding to the needs of different industries
- The need to reduce the cost of the system, including a reduction in the training levy and reducing complexity where possible.

## Migration should be responsive to regional skill needs

Australia's economy and society have significantly benefited from migration, particularly when the program has been well targeted and responsive to the skill needs of businesses and the economy. A focus on relatively young skilled migrant workers has been highly beneficial to an otherwise aging workforce, with the most successful migrants being those that are employer sponsored.

According to an analysis undertaken by CEDA (Figure 5) employer sponsored migration delivers the most economically beneficial outcomes to the migrant with wages being significantly better than other categories of migrants as well as over 30% above the average for Australian-born workers.

Figure 5. Wage outcome compared with Australian born workers for migrants arriving 2015-19<sup>6</sup>



With this evidence of these beneficial migrant outcomes between 2015 and 2019, it is important to note that up until mid-2017 employer sponsored migrants, both permanent and temporary, could be

<sup>6</sup> Barker, A & Tofts-Len, S (2024), *Making Better Use of Migrants' Skills*, CEDA

sponsored under practically any skilled occupation. Provided there was a proven skill need at the business level, employers could sponsor under the “old” CSOL list (Consolidated Skilled Occupation List) which encompassed almost all ANZSCO occupational codes in Skill levels 1 to 3. This program was the most responsive as it was able to fill the skills gaps which may have been local to a business or reflecting a regional shortage without reliance on lists and assessment of shortage.

The discontinuation of this successful pre-2017 approach to employer-sponsored permanent and temporary migration has not only reduced the responsiveness to local skill needs, but has significantly increased complexity, cost and uncertainty. Although it is essential that any occupation list that controls migration is reviewed regularly, the uncertainty created for employers and industries, and the effort required to ensure that vital occupational needs are not lost or are recaptured through the review process, should not be underestimated.

Unfortunately, rather than embracing all skilled occupations, under the new migration strategy employer sponsored temporary migrants paid between TSMIT and \$135,000 will be limited to those occupations on the Core Skills Occupation List (CSOL).

Although the proposal in the Migration Strategy for a single Core Skills Occupation List is appreciated in the context of reducing complexity, it has the major disadvantage of not enabling regional needs. The current JSA Skills Priority List which will heavily inform the recommendations for the CSOL assesses both state/territory as well as national needs. However, the single list CSOL approach will not enable these regional and State/Territory shortages to be met even if the occupation in that region meets the other criteria that would assess the occupation as being suitable for migration sponsorship.

In addition, a national-only approach does not take into account the reality that lower wage outcomes (but still above the TSMIT) for migrants in the region where the occupation is in shortage may deliver similar economic outcomes for the migrant as the cost of living is likely to be lower.

In our consultations undertaken as part of input to the CSOL, it was very clear that skill shortages were particularly being felt in the regions. As the above data shows, our industry is geographically very diverse, requiring a range of skills both in terms of occupation and management levels. A migration system that does not enable the meeting of regional skill needs will result in significant impediment to regional economic growth.

This review of regional migration settings creates an opportunity to embrace the more responsive approach by allowing all regional employers to sponsor any skilled occupation at skill level 1 to 3. In implementing this recommended reform, if there are any integrity concerns created by the migrants taking the jobs that should be available to Australian skilled workers, then this can be closely monitored through evidence analysed by both the Ministerial Advisory Council (MACSM) and Jobs & Skills Australia. For example, any high-level use occurring in the regions for particular occupations can be identified through the data and action taken in those situations. This is a much more targeted and efficient approach than the current extensive analysis and shortage lists that simply do not work to satisfy regional skills gaps.

In short, responsiveness to regional migration needs should not be sacrificed for the relatively superficial benefit of simplicity created from having one list. The occupations available for regional employers should reflect local and regional needs, with ideally all skilled occupations available, or at worst case, the maintenance of a regional occupation list that is much more extensive than the proposed CSOL

**Recommendation:**

2. *As the government implements its new approach to assessing skill needs for migration purposes, it is important to remember that the most responsive, efficient and successful system for temporary skilled migration was when employers could sponsor any skilled occupation provided that a skills gap could be identified by the business and without the necessity for national shortage assessment or complicated lists.*
3. *Responsiveness to regional migration needs should not be sacrificed for any perceived simplicity created by having one list. The occupations available for regional employers should reflect local and regional needs, with ideally all skilled occupations available, or at worst case, the maintenance of a regional occupation list that is much more extensive than the proposed CSOL.*
4. *For those occupations that are not assessed as in shortage on a national basis, JSA should identify those that would satisfy the Migration Model criteria on a state or regional level and recommend that those skilled occupations in shortage in those regions be met through migration sponsorship via a regional occupation list.*

## Transitional arrangements are essential

The proposed approach to the Core Skills (middle) category of the new Skills in Demand Visa will regulate access to employer sponsored temporary skilled migration for migrants with a market salary between the TSMIT and \$135,000. Given the broadening of the assessment criteria in JSA's assessment model to include migrant and employment outcomes, the approach has the potential to deny migration options to many important occupations that currently can be sponsored for either 4 + 4 years, or 2 + 2 years.

In our industry, JSA has indicated in their draft that important occupations, including cooks, chefs, hotel & motel managers, hotel service managers and restaurant managers, are not in the "confident on list" category. All of these occupations are currently available for temporary migration sponsorship, and to bluntly turn off that option despite a skill shortage (whether that be national or regional) would be very harmful to businesses, the industry and the economy generally.

The migration strategy released in December 2023 stated:

*"The Core Skills Occupation List (CSOL) will be a single consolidated list, developed by Jobs and Skills Australia, who will:*

- *start with the Jobs and Skills Australia Skills Priority List, constructed through a comprehensive evidence-based process that takes account of a range of factors and includes extensive tripartite engagement and input from across Commonwealth and state and territory governments*
- *analyse whether migration is an appropriate path to address the identified shortages, considering how well migrants do in the labour market upon arrival, reliance on sponsored skilled visa holders relative to employment size and vacancy data, the likelihood of domestic supply for those occupations and the market salary for occupations*
- *support this analysis through proactive stakeholder engagement, including with business and unions, and a structured qualitative research component. This will involve semi-structured interviews with a range of labour market participants, targeting both those*

- experiencing shortages and those that aren't, to gain a broad range of views on the appropriateness of migration pathways for a range of occupations*
- *supply a list of occupations that the Government considers are required to be on the list to fulfil Australia's obligations under international trade agreements.*

The inclusion of the new criteria such as migration and employment outcomes has led to many of the concerns currently being raised, not just by our industry but others, about occupations which are currently available for sponsorship potentially being removed from the list.

The most relevant and recent data on migrant outcomes in the public domain, which the JSA Migration Model identifies, is the Continuous Survey of Australia's Migrants for 2019 which predates both COVID and the more recent significant increase in the TSMIT from \$53,900 to \$70,000 (\$73,150 from 1 July 2024) which occurred in July last year.

Although we understand that JSA has access to more recent data, it is procedurally unfair if industry is not able to examine this evidence. Even more importantly, as not enough time has passed, it is not possible that any evidence will currently be available that will more appropriately test medium to long term economic migrant outcomes following the TSMIT rise.

Given this important context of data inadequacy, we strongly recommend that an appropriate transitional arrangement be implemented by government until such time as more up to date and publicly available data can properly ascertain the likely employment and migrant economic outcomes from the new system.

In the interim, to properly take into account the spirit and objective of the new strategy, in our submission to JSA on the draft CSOL, we have encouraged JSA to flag those occupations which currently meet the shortage criteria but may not satisfy an assessment based on the migrant and employment outcomes. This would put all stakeholders on notice that, subject to the review of the more recent and relevant data, flagged occupations may become unavailable in the future for sponsorship.

This transitional arrangement will provide a more orderly approach to migration rather than a hard stop that could result from the implementation of new criteria not previously part of the system. The economic impact of turning off migration as an option for occupations clearly in shortage would be too great without an appropriate transitional arrangement.

**Recommendation:**

5. *To avoid significant economic consequences of removing temporary skilled migration sponsorship for occupations in shortage, there should be a transitional arrangement where occupations can be flagged for future review once data is available that will more accurately reflect migrant and employment outcomes of sponsored migrants in the new system.*

## Assessment criteria

The JSA Migration Model developed in response to the migration strategy direction (see above) does not include any analysis of the projected impact on occupations and industries if migration sponsorship currently available was removed, nor does it sufficiently account for future skill needs. Although JSA states that its Skills Priority List (SPL) “provides a detailed view of occupations in shortage and the anticipated future demand for occupations in Australia”, the emphasis in the commentary and analysis is on current shortages rather than future skill needs.

Given the employment projections for our industry (see above), our future skill needs are significant and will be even greater should the projected growth in tourism driven by the Government's THRIVE 2030 tourism strategy be realised.

As, in part, the brief to JSA is to “analyse whether migration is an appropriate path to address the identified shortages”, it is recommended that the assessment criteria be broadened to pose the question of what would be the economic consequences of regional employers not having access to migration to meet skill shortages and future skill needs. In the JSA Migration Model, there is no indicators or datasets that addresses this issue. In our industry, for example, a shortage of skilled managers and chefs would reduce trading hours or reduce the number of rooms available to guests. This lowers productivity and reduces the utilisation of existing assets.

The economic impact of not accessing skilled migrants when there is a genuine shortage is the counterbalancing point to the inclusion of migrant outcomes in the assessment criteria. Clearly

**Recommendation:**

6. *Government should instruct the JSA to broaden its Migration Model to increase weighted importance of future skill needs and, in addition, include the measurement of the economic impact on industries and businesses if skill shortages cannot be addressed by migration.*

migrant outcomes is examining the economic impact of the migrant experience on the worker; the recommended counterpoint is to also assess the economic impact of the skill shortage on the business and industry if the role is unable to be filled.

## Permanent regional skilled migration (RSMS) list

One of the most positive aspects of the Migration Strategy is a return to the policy that all temporary skilled migrants should have a pathway to permanency thus eliminating the previous distinction between short-term and medium-to-long-term TSS.

However, what is not clear at this stage is what list of occupations will be eligible for sponsorship under the permanent Employer Nominated Scheme visa (ENS) and Regional Skilled Migration Scheme (RSMS). Consistent with the policy recommendation (*Recommendation 2*) that regional employer sponsored migration should be able to access all skilled occupations, the RSMS scheme should be revamped to also embrace all skilled occupations. Should this broader approach not be adopted, then at the very least, a more extensive list than the proposed CSOL should guide the RSMS scheme to take into account regional differences as well as to recognise that migrant and employment outcomes for permanent residents will not be influenced by the temporary nature of the migration.

The benefits of a more extensive occupation list for RSMS sponsorship is that it will:

- ensure the important objective of pathways to permanency for all temporary skilled migrants is achieved.
- Enable occupations that are in shortage on a regional or state basis be more accessible for permanent employer sponsored migration.
- Recognise that the assessment of permanent migrant outcomes will be different than for temporary migrants

In addition, we are concerned that the current provisional nature of the visa for permanent migrants to commit to working in the regions for three years may not be achieving the desired objective of attracting migrants to the regions. Although the objective is supported in principle, as it is consistent with other policies recommended to draw migrants to the regions, such a provision comes with the



risk of migrants not valuing the migration option as highly (as the discussion paper itself points out on page 16).

From the employer's perspective, the provision nature of the relatively new regional permanent visa does not give them any additional assurance that the migrant will stay working with them. Whether or not there is a provision for the migrant to stay working in the regions, it is in the regional employer's interest to seek, through employment negotiations, a long-term commitment to working with the sponsoring business.

In this context, the most important objective in reviewing the settings for permanent regional migration is that all regional permanent visa options are as attractive as possible for migrants including a highly responsive and accessible RSMS scheme that encourages positive negotiations between the sponsor and the intending migrant that will lead to better long-term outcomes.

It is also of note that the skilled regional migration program is dominated by independent migrants (26,707 of the 33,944 migrants in 2022-23), with employer sponsored (visa s/c 494 – 7,004) only 20% of the program. As it is understood that this split is demand-driven, employers are demonstrably not utilising this avenue at scale, or if it is on first-come-first-served basis, then perhaps their sponsorship is being beaten to the mark by the “quick to apply” independents. This is further evidence that the changes to the regional migration system inclusive of the introduction of the provisional period has not worked as intended. It has reduced the attractiveness to employers of using the options.

As the discussion paper's data shows, further evidence of this failure is seen in the figures that the RSMS program with over 10,000 grants in 2016-17 was more than the combined number of the RSMS and visa 494 Skilled Employer-sponsored regional (provisional) visa in 2022-23.

**Recommendation:**

7. *The list of occupations available for permanent regional employer sponsored migration (RSMS visa) should be all skilled occupations, or at least more extensive than the proposed CSOL in order to accommodate regional and state needs as well as occupations in shortage.*

## Designated Area Migration Agreements (DAMAs)

As the discussion paper identifies, DAMAs can “help address the unique workforce challenges in regional Australia where the standard sponsored visa arrangements do not meet their needs.” Despite this positive objective, DAMAs are complex and require capacity and resourcing to effectively manage them, and State Governments are increasingly becoming involved in seeking whole of state or Territory DAMAs such as in the NT or Western Australia.

Growth in visa grants, both permanent and temporary, under DAMAs has grown considerably. This has in part been as a result of prioritisation and DAMA settings changes that have facilitated this growth, but most fundamentally, it is a reflection that the current migration settings outside of the DAMAs have become too restrictive and far less responsive. The two big changes that have led to this situation have been the rise in the TSMIT, and even more importantly, the complexity and restrictions created by the occupation lists introduced in 2017 (see above).

Fundamentally, if the overall system no longer works to meet the needs and gaps clearly existing in the workforce, necessity prompts the increasing use of “workarounds”. DAMAs are essentially a

“work-around”, which unfortunately come at a cost of layers of complexity, resource use, cost and burdensome regulation involving multiple stakeholders.

Workarounds are not, or at least less, necessary if the system itself is more responsive, efficient and effective. This regional review provides the opportunity to improve the overall system, such that the long-term ambition should be for there to be less DAMAs and labour agreements – enabling them to be truly focused on local and regional issues of difference. The alternative, and current trajectory without improvement, would be the potentially perverse situation of most if not all State and Territory governments seeking DAMAs which would make the overall system less relevant but make the regulatory framework excessively complex and fragmented.

If skilled, and much needed occupations become or remain unavailable for sponsorship generally, and TSMIT remaining as a barrier for regional skilled migration, then DAMAs will continue to have an important role. If this is the case, then there is no doubt that the process involved in establishing them, and the ongoing utilization of them, needs to be simpler.

**Recommendation:**

- 7. This regional migration review should aim to make the overall system as responsive, efficient and effective as possible for regional sponsors so as to minimise the need for Designate Area Migration Agreements. In the meantime, the process of establishing and accessing sponsorship under a DAMA should be made much simpler and more time-responsive.*

## Ensuring TSMIT works for regional jobs

As mentioned above, one of the most common drivers for a DAMA, or indeed most industry and company labour agreements, is that the market salary for occupations seeking to be sponsored in a particular region, business or industry is below the Temporary Skilled Migration Income Threshold (TSMIT). This has become even more of an issue since the TSMIT was raised to \$70,000 (now \$73,150) and will continue to be so due to the commitment to index it annually according to the change in Average Weekly Ordinary Time Earnings.

AHA/AA acknowledges the Labor Government’s long-standing policy to increase the TSMIT and understands the reasons for the increase to, in part, address the integrity concerns in the temporary skilled migration scheme. However, this does not deny the reality that the TSMIT is too high for many occupations needing to be sponsored. Indeed, the government’s own migration strategy acknowledged this by identifying jobs below the TSMIT as the first of the three tiers in the new system, with labour agreements being the chosen resolution to this problem.

In the context of regional migration, TSMIT has a particular impact as the market salaries in the regions are frequently below those in the capital cities. However, skills gaps are equally impactful on business and economic success, with regional employers facing very real and often distressing challenges in keeping their businesses sustainable when skilled jobs cannot be filled.

In the past there have been TSMIT differentials recommended for migrants working in the regions, such as a 10% lowering of the TSMIT. Although this may be one option that could be considered as part of this regional review, there is another option that recognises the dual role of the TSMIT that is not readily understood. Under the regulations, the TSMIT not only sets the temporary income threshold that the worker is actually paid, it also sets the threshold for eligibility, being that the sponsor has to demonstrate that the market salary of similar workers in the region or in their business

is above the threshold. For regional workers, it is recommended that this second function be waived and that the TSMIT have the sole function of setting the minimum salary the migrant will be paid. With increasing enforcement activity from Home Affairs as well as FWO, together with links into the tax system, the actual payment made to the worker can be effectively monitored to ensure the person is being paid above the TSMIT.

One outcome of this recommendation would be that it is possible that the migrant worker would be paid more than the Australian workers doing similar jobs in the region. While this situation is not ideal, it is better than all jobs in the business, and regional economies generally, being at greater risk due to the inability of the employer to fill a vital skills gap. The business itself would then need to manage any perceived inequity of pay, just as they do now when workers are paid at different rates.

**Recommendation:**

8. *In acknowledging that the Temporary Skilled Migration Income Threshold (TSMIT) precludes the sponsorship of many important skilled occupations in regional Australia, consideration should be given to allowing sponsorship by regional employers who are willing to pay the migrant above the TSMIT even when the market salary for that occupation in the region is below the TSMIT.*

## Working Holiday Makers

One of the most important issues for our members in relation to regional migration is the necessity for continued access to working holiday makers as a complement to their local workforces. Working holiday makers (WHM) are, in large part, an ideal mix of those seeking travel, adventure and work (to earn money in order to fund the first two ambitions). Their mobility is an important aspect of the visa holder, as work for hotels across Australia is often seasonal and therefore temporary. Their presence in the AFS workforce allows for employers to better manage their overall labour costs by injecting flexibility so necessary with such an event and seasonal-impacted industry.

As an important principle, the inducement for WHM to work in regional Australia is a highly valuable setting within the WHM program as:

- It encourages travel and therefore boosts the regional tourism economy
- It provides a mobile regional workforce which is in contrast to the less mobile habits of most of the domestic workforce
- The WHM are often highly engaged and skilled with a range of different backgrounds and experiences. Their spirit of independent travel is often highly suitable for work in a customer-service industry such as hospitality.

Although we seek a changed definition of qualifying regions, the AHA/AA strongly supports the retention of a requirement for WHM to undertake regional work so that they can access second and third year visas. In this context we welcome the comment in the discussion paper that Government will not be accepting a recommendation of last year's immigration review panel to limit the Working Holiday Maker visa to one year, acknowledging that such a move would "would significantly damage local economies in regional Australia" (Discussion paper, page 12). We agree with this conclusion.

Further, as this statement only commits the government for visa extensions beyond one year, it is recommended that a third-year extension should also be retained. Already, the largest source market for WHM, being WHM from the UK, have the ability to stay for up to three years locked in via that agreement. WHM from other countries should have the same opportunity to stay for up to three years, although for the reasons mentioned above, the UK FTA benefit for that work to be in any location in Australia should not be extended to all.

### *88-day rule*

Questions posed in the discussion paper relating to WHM include whether the 88-day rule was the most appropriate inducement to work and travel in the regions, and also the current definition of specified work. In relation to the 88-day rule, there is strong support in our industry that a requirement to work in the regions in order to access a second or third year visa should continue. There has also been no concerns raised by our members about the length of time, so a continuation of the 88 day requirement as a minimum is supported. There should be clarity, however, that the 179 day rule for the third year visa can relate to work in year one or across both year one and two.

### *Length of time with each employer*

Generally, there is a limit on WHM in that they cannot work with one employer for over six months without seeking permission, with one important exception being if they work in the tourism and hospitality industry. This exemption has proved to be very valuable to our industry and should become embedded into the program as a permanent feature.

### *Specified Work*

The definition for specified work is very complex, postcode-driven and creates at times inexplicable differences between regions – the “have and have nots”. Currently “specified work” as it relates to the tourism and hospitality industry is that it needs to be undertaken in northern or remote and very remote Australia, which is much more restrictive than industries such as agriculture and construction. This narrow definition as it relates to our industry means that the hospitality and tourism businesses in many regional areas cannot access temporary migrant workers to fill roles. It is recommended that the language changes to “eligible regional work”, where the definition of regional as it relates to eligible work for WHM is outside of a capital city and the Gold Coast, but with the exception that Darwin should be considered regional. In relation to industries where regional work can be undertaken, the range of industries including our own currently identified should remain.

### *Minimising Exploitation*

One of the key concerns often raised about WHM is the potential for exploitation. In the discussion paper it states " that worker exploitation in the Working Holiday Maker program has existed unchecked for too long and the Government will consider a range of options to address this as part of this evaluation."

In our extensive engagement with Ministers and the department it is clear that the primary exploitation concerns are not concerned with our sector. This suggests the appropriateness of two important policy positions:

- That there should be comfort from an integrity perspective in supporting regional work in the broader regional definition as recommended above as it relates to the tourism and hospitality industry.
- As a longer term strategy, it may be more appropriate to ensure the PALM program is well designed for the agricultural industry and allow the WHM program, with its emphasis on travel and experience, to be more responsive to regional needs in the tourism & hospitality industry.

### **Recommendations:**

9. *That the ability to seek a WHM visa for the second and third year continue, and that this be enabled through a minimum of 3 months working the regions in the year prior to seeking the extension visa*
10. *That specified work becomes known as “eligible regional work”, and that for the tourism and hospitality industries it is work in regions outside of the capital cities and the Gold Coast, with the exception that Darwin also be considered as regional work.*
11. *As a longer-term strategy, it may be more appropriate to ensure the PALM program is well designed for the agricultural industry and allow the WHM program, with its emphasis on travel and experience, to be more responsive to regional needs in the tourism & hospitality industry.*

## **Migration as an international relationship builder**

One of the objectives identified in the discussion paper is the importance of strengthening Australia’s international relationships including with our Pacific neighbours.

This objective sits comfortably with the hotel industry as it is a global industry, particularly through the strength of international accommodation chains as well as the whole industry being at the core of the Australian offering to international visitors. Migration can build these relationships through:

- Being welcoming and supportive of migrants including those who seek to work in the regions
- Continuing to invite working holiday makers to experience work and travel here, and ensuring the work requirements remain enticing.
- A strong international student offering, including a continuation of attractive work rights
- Fast-tracking intercompany transfers for accredited sponsors
- Encouraging labour exchange by recognizing the benefit to Australians of reciprocal opportunities to work overseas
- Improving the two-way benefits of the PALM program

Although the specific program settings of PALM are outside of scope, it is important that the regional migration settings recognise the opportunities to set long term objectives of programs such as PALM and working holiday makers so as to ensure their complementary nature. As recommended above, it may be that PALM can develop into a far more certain, and closely regulated, approach for the agricultural industry, given their seasonal certainty.

Our close ties to our Pacific neighbours has identified that programs such as PALM should address concerns about the loss of skills and labour from those nations. This sector would be keen to work with government and our Pacific neighbours to make the program work better for all concerned, As it relates to our industry, it is important that programs such as PALM be mutually beneficial, and specific comments of the Tasmanian Hospitality Association based on experience working with countries such as Fiji are supported.

One opportunity that may be mutually beneficial and could be explored as a pilot would be if apprenticeships in cooking trades, for example, be available for regional employers to sponsor workers under the PALM program from the Pacific with an inducement for workers to take those skills back to their country after a period of post-qualification work with their Australian employer. This could assist Australian businesses who find it difficult to attract cooking apprentices, while at the same time helping our global region with the building of skills.

## Costs within the migration program

Regional employers who are desperate to fill skills gaps find the costs and complexity of the system very difficult to contend with. The SAF training levy is too high, and it has been a consistent recommendation of the AHA/AA that it be halved for both temporary and permanent employer sponsored migration. Concerns about the cost are even further frustrated by a lack of understanding about what the money is used for.

At the very least, within this review of regional migration, a halving of costs for all regional migration sponsorship should be considered. This recommendation is consistent with the overall theme of our submission being to enable regional employers to be more competitive in the marketplace for the skills needed to run their businesses.

### **Recommendation:**

*12. The Skilling Australians Fund Levy should be halved for all migration sponsorship, or at the very least, halved for all employers seeking to sponsor a permanent or temporary skilled migrant for regional work.*

## Importance of key occupations

In our submission to Jobs & Skills Australia, we presented extensive evidence to support the continued need for sponsorship availability for a number of occupations vitally important to our industry. That evidence was informed by detailed consultations with members, with one of the most consistent messages being that these shortages and the need for continued access to the sponsorship of these occupations was even more keenly felt in the regions.

Before highlighting specific occupations, it is important to express concern about the increasing dominance of shortages analysis and concerns about the qualitative data models being used and the seeming reduction in qualitative information about shortages in the workforce. The shortages analysis at JSA rely in large part on experiences in advertising and filling positions. Many of the key roles that industry identifies are in shortage are so important to the business that they have to be filled, even if the person they recruit into the position does not have the skills and experience needed for the role. This impacts business success and productivity. Industry bodies such as ours are exhausted by the ongoing efforts to ensure that our members have access to the skills they need. It is a gross inefficiency in the system.

Specifically for the regions, a national analysis approach cannot possibly identify when shortages occur at the local or business level, and it is even difficult at the regional level for niche occupations. A recommended above, the best system for regional Australia for both permanent and temporary skilled migration would be for all occupations at Skill Level 1 to 3 to be available for regional migration.

Below is a summary of what was put forward to JSA as the need for regional employers to continue to be able to sponsor these skilled workers for both permanent and temporary migration is highly relevant to this review of regional migration.

### **351311 Chefs**

Chefs have been on priority skills lists consistently for decades. The difficulty in securing skilled chefs has been a constant challenge for the hospitality industry. Skills supply from the domestic training



system has been part of that concern but even more so, chefs (and cooks) are not readily substitutable across cuisine styles nor skill and experience level. There is vast difference in skills needed in a fine dining restaurant in a regional resort versus a café versus a function venue.

In addition, the customer expectation for authenticity in cuisine, as well as the different skills required across cuisine styles results in the sourcing of appropriate chefs for the nature of the business very challenging. Australia is well known for the quality and variety of its foodservice offerings, something appreciated by both domestic consumers as well as international tourists.

Importantly the occupational code Chef is rated within the ABS ANZSCO framework as skill level 2 which is the same as for professional occupations. Chefs include all levels from the Commis Chef just completed their apprenticeship, through to the Executive and Head Chefs that run major or multiple dining and venue outlets.

It is strongly recommended that Chefs be included on the Core Skills List as it embraces multiple levels of chefs, many of which, particularly in our sectors, have market salaries well above the TSMIT.

As additional evidence in support of the high number of chefs employed in our industry which are Chef de Partie or above, one of the larger hotel groups has supplied to AHA/AA a breakdown of chef numbers. This group employs 517 chefs (all job titles chef – no cooks) broken down as follows:

Commis Chef	25.0%
Demi Chef	17.4%
Pastry chef	0.8%
Chef de Partie	35.8%
Sous Chef	11.0%
Area Exec Chef, Exec Chef	
Chef de Cuisine, Head Chef	10%
<i>Percentage of all chefs which are Chef de Partie or above</i>	<i>56.9%</i>

In addition to the above evidence, it is noted that as at 1 May 2024 on Seek, the average salary for a chef is \$70,000, Sous Chef \$78,000, a Head Chef \$85,000-\$100,000 and an Executive Chef \$105,000 to \$125,000. The title “head chef” tends to be more commonly used in pubs and restaurants which is why it is not part of the accommodation survey. Pub groups also have area chefs, or Chefs de Tournant which oversee the kitchens across a number of pub outlets. Salary information supplied by members for this submission would indicate that the average salary for an area chef is \$150,000.

Given all of this evidence, it is essential that the occupation of chef continue to be available for sponsorship, including for regional employers. Any possibility of chefs not being available for sponsorship would cause major dislocation for the hotel industry.

## **351411 Cook**

For AHA/AA members, this occupation is more widely used in a pub or tavern than in accommodation. Feedback provided by members for this submission indicates there would be strong concerns if cooks were no longer available for sponsorship. Now that the TSMIT is \$70,000 and soon to rise further to \$73,150, sponsorship of Cooks will focus on those more highly skilled cooks that cannot be sourced from the Australian domestic workforce, particularly in regional areas.

If the transitional arrangement recommended above is taken up, it is recommended that Cooks be available for for sponsorship, and if necessary and appropriate, flagged for future review relating to migrant outcomes.

## **351112 Pastrycook**

During consultations, AHA/AA members consistently raised the difficulties in sourcing pastry cooks. In many accommodation properties, this difficulty has led to an outsourcing of the supply of pastries, but this does not alleviate the need for the skills along the supply chain.

## **141311 Hotel and Motel Manager**

In the hotel and accommodation sector, this occupation encompasses a wide range of job roles that are vitally important to the hotel industry. Our extensive consultations on the difficulties with recruiting for these managers indicated that there is a strong impact on the current availability of experienced supervisors and managers due to the enormous loss of experienced hospitality workers during the COVID pandemic. Experienced workers in 2020 who would normally have progressed to management today are not available as they took up job roles in other industries due to the unpredictability of trading during the pandemic as a result of repeated lockdowns and restrictions.

Member feedback indicates that managers are in shortage across all of Australia, and that the contradiction between this evidence, and the data-based analysis of JSA, is due to the fact that businesses are receiving applications for the roles and they are being filled, but the quality of the applications is nowhere near what it was before COVID and productivity is suffering due to the loss of experience during the pandemic.

Managerial roles have to be filled, and access to experience hotel managers including migrant workers is critically important to the industry's economic future, and importantly to assist in training and guiding the existing workforce. This strong and consistent feedback about the lack of experienced supervisors and managers particularly due to the pandemic is a key comment included in the consultation undertaken as part of the CSOL submission.

As a result of the additional industry evidence of a severe shortage in experienced workers being available for hotel managerial roles, together with salary evidence of strong employment outcomes, it is recommended that hotel & motel managers continue to be available for sponsorship.

## **431411 Hotel Service Manager**

The difficulties in finding experienced skilled workers to fill Hotel Service Manager roles are the same as for Hotel managers, and consultation with industry has reinforced the difficulties in recruitment, and questions the JSA analysis that the roles are largely not in shortage.

It is important to note that this ANZSCO coded occupation is misleading and we are in active consultation with the ABS to rename the occupation to Accommodation Services Manager and shift it alongside Hotel Managers at the managerial level. This occupation covers important job roles in the accommodation sector including front office manager and Executive Housekeeper.

It is recommended that Hotel Service Managers continue to be available for sponsorship.

## 141111 Café & Restaurant Manager

In the draft Core Skills List, JSA has placed this occupation in the “confident not on list” category. We understand that this is as a result of both the assessment of skill shortages, as well as concerns about the migrant outcomes.

As was clear from our extensive consultations, our members are definitely experiencing shortages relating to experienced restaurant managers, with strong evidence of difficulties in the regions. In relation to migrant outcomes, our sector’s experience in employing migrants and Australians in restaurant manager roles is definitely very positive and we are concerned that good practices in our sector may be impacted by concerns from other sectors. One consideration that could assist in this industry differential would be that for migration purposes restaurant managers working in hotels, casinos and accommodation properties could be treated as a category of hotel manager rather than under this occupational code. This outcome would be similar to the current caveats that apply in the migration system to restaurant manager where the take-away food managers are not eligible for sponsorship.

It is recommended that Café & Restaurant Managers continue to be available for sponsorship, and if necessary a caveat could apply that such availability was limited to restaurants operating within a accommodation or hotel property.

## 132211 Finance Manager

Although this occupation is not particular to the hospitality industry, consultation with members consistently provided feedback concerning the difficulty in filling finance manager positions in accommodation businesses.

## 139999 Specialist Manager NEC

This is another managerial role not exclusive to hospitality, but it is used by members to sponsor Hotel Security managers, as Security Manager (non-ICT) is one of the specialisations within this occupational code.

ANZSCO codes that are NEC are very difficult to analyse from a labour market perspective, and this may be the reason why JSA has placed this occupation in the “confident not on list” category. However, currently this occupation is accessible for migration purposes under the Short-term list, and the removal of the opportunity to sponsor hotel security managers will create skill shortages in our industry.

### **Recommendations:**

12. *That the following occupations continue to be available for employer sponsorship, including for regional migration.:*

- *Chef*
- *Cook*
- *Pastry cook*
- *Hotel & Motel Manager*
- *Hotel Service Manager*
- *Café & Restaurant Manager*
- *Finance Manager*
- *Specialist Manager NEC (non-ICT Security Manager)*

# About the Australian Hotels Association



The Australian Hotels Association (AHA) is an organisation of employers in the hotel and hospitality industry registered under the *Fair Work (Registered Organisations) Act 2009*. Its diverse membership of more than 5,600 businesses includes pub-style hotels plus three, four and five-star international accommodation hotels. AHA members provide a wide range of services to the Australian public including accommodation, food, beverage, wagering, gaming, retail liquor, functions, events, live music, and entertainment.

The AHA's members are serviced by branches located in every Australian state and territory and a Canberra-based national office. As well as being members of their respective state or territory branch, accommodation hotels are represented by Accommodation Australia.

The Australian hotel industry is a 24/7 labour intensive service industry and is a key element of Australia's tourism industry. The makeup of the hotel workforce is extremely diverse and includes adults of all genders and ages. The AHA member workforce comprises:

- Over 300,000 workers
- 50% of members offer apprenticeships
- 60% of employees are female
- 65% of businesses are family owned with family members working in the business

# About Accommodation Australia



**Accommodation Australia**  
A DIVISION OF THE AHA

Accommodation Australia (AA) is the nation's only peak body representing the entire accommodation sector. AA was formed on 1 July 2023 after the merger of Tourism Accommodation Australia and the Accommodation Association of Australia. AA represents more than 1400 properties ranging from independent regional motels and caravan parks to the largest local and international hotels and resort groups, including Best Western, Choice, Golden Chain, Lancemore, Ovolo, Crystalbrook, Accor, Hyatt, IHG, Marriott, Crown, Pan Pacific, TFE, Minor, Ascott & Quest Apartments, EVT Group, Star, Hilton and Wyndham Destinations.

AA is the accommodation division of the peak hospitality body – the Australian Hotels Association