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David Wilden  
First Assistant Secretary  
Immigration Policy Reform Taskforce  
Department of Immigration and Border Protection  
(Online submission)

### **Overview**

Maritime Industry Australia (MIAL) welcomes this opportunity to make submission on the Visa Simplification process being undertaken by the Department of Immigration and Border Protection (DIBP).

MIAL represents the collective interests of maritime businesses, primarily those operating vessels or facilities from Australia. MIAL is uniquely positioned to provide dedicated maritime expertise and advice, and is driven to promote a sustainable, vibrant and competitive Australian maritime industry and to expand the Australian maritime cluster.

MIAL made a submission to the DIBP on 19 June (by email) on the Skilled Migration Reforms and we would ask that the issues raised in that submission also be considered in future reform processes, where relevant.

### **Issues**

- *the scope for a reduction in the number of visas from 99 at present, to approximately ten visas;*

MIAL supports the stated goals of the visa simplification process of making the visa system easier to understand and easier to administer. Reducing the number of visas to 10 may achieve this. However, visa numbers should not be reduced at the cost of the current in-built flexibility of the visa system that results from the large number of visa types.

If 10 visa types are adopted, there would need to be a high degree of granularity within those visas to allow for appropriate tailoring to different circumstances both now and in Australia's future. Flexibility in the visa system is required, and MIAL would suggest that this flexibility be built into the system rather than the result of ongoing changes. This is because companies and individuals looking at doing business in Australia or coming to Australia will look at what is currently available, not what might or might not be available in the future. A lack of clarity about how a future of visa system will look will only discourage companies and individuals from investing their time in Australia. The changes to the visa system earlier in 2017 without industry consultation caused significant concern amongst MIAL member companies about their ability to continue to operate.

- *the delineation between temporary entry and long-term or permanent residence;*

MIAL supports continuing and strengthening existing pathways to permanent residence from temporary entry. The comparison to immigration programs in countries that the DIBP identifies as “like-minded countries” (the US, the UK and the Netherlands) should be made with sensitivity to significant differences in the immigration history, skill requirements and geographical location of those countries. Australia is uniquely isolated compared to the countries listed and attracting immigrants, especially skilled immigrants, is a wholly different proposition for our nation.

- *the role a period of provisional residence could play in enhancing the integrity of the visa system and easing the burden on taxpayers; and ensuring that our visa system supports Australia as a competitive and attractive destination for temporary and longer-term entrants.*

Provisional residence may have a greater role to play in a simplified visa system. Changes should be balanced against the risk of reducing the attractiveness of immigration to Australia. For example, relocation to a geographically remote country on a provisional basis is likely to discourage some applicants. Where access to support services is restricted, great care should be taken about where that burden will then shift – if it is shifted off the taxpayer but on to businesses and communities that will be a disappointing outcome.

MIAL is keen to avoid a circumstance where all skilled migration happens through businesses, with business bearing costs such as relocation, temporary accommodation, and family travel, as is presently the case.

## **Conclusion**

As above, the feedback that MIAL has received from its members is that the visa system needs to be:

- innately flexible (not subject to constant review and change) in order to provide long term visibility of visa availability and processes;
- cognisant of the full impact of changes on industries and small to medium sized businesses;
- simplified through an open, transparent and fact-based process.

**Isabelle Guaran, Industry Employee Relations Manager, MIAL,**  
[isabelle.guaran@mial.com.au](mailto:isabelle.guaran@mial.com.au) (03) 9647 6005

