



Department of Agriculture, Water and the Environment

Targeted update of agricultural sector occupations in ANZSCO

June 2021

About the Australian Fresh Produce Alliance

The Australian Fresh Produce Alliance (AFPA) is made up of Australia's key fresh produce growers and suppliers. The members include:

- Costa Group
- Perfection Fresh
- Montague
- One Harvest
- Pinata Farms
- Fresh Select
- Mackay's Banana Marketing
- Driscoll's
- 2PH Farms
- LaManna Premier Group
- Rugby Farming
- Freshmax
- Fresh Produce Group.

These businesses represent:

- half the industry turnover of the Australian fresh produce (fruit and vegetables) sector - \$4.5 billion of the \$9.1 billion total
- a quarter of the volume of fresh produce grown in Australia - 1 million of the 3.9 million tonne total
- more than a third of fresh produce exports - \$410 million of the \$1.2 billion export total
- more than 1,000 growers through commercial arrangements, and
- more than 15,000 direct employees through peak harvest, and up to 25,000 employees in the grower network.

The key issues the AFPA is focusing on include:

- packaging and the role it plays in product shelf life and reducing food waste landfill,
- labour and the need for both a permanent and temporary supply of workers,
- market access to key export markets for Australian produce,
- product integrity both within and outside of the supply chain,
- pollination and research into alternative sources, and
- water security, including clear direction as to the allocation and trading of water rights.

The AFPA's aim therefore is to become the first-choice fresh produce group that retailers and government go to for discussion and outcomes on issues involving the growing and supply of fresh produce.

Products grown by AFPA Member companies include:

Apples	Blueberries	Cherries	Nectarines	Raspberries
Apricots	Broccoli	Fioretto	Onions	Salad leaf
Asparagus	Broccolini	Green Beans	Oranges	Spinach
Avocado	Brussel Sprouts	Herbs	Peaches	Strawberries
Baby Broccoli	Butternut	Lemons	Pears	Sweet Corn
Baby Corn	Pumpkin	Lettuce	Pineapples	Table grapes
Bananas	Cabbage	Mandarins	Plums	Tomatoes
Beetroot	Cauliflower	Mango	Potatoes	Water Cress
Blackberries	Celery	Mushrooms	Cucumber	Wombok



Summary

Sourcing labour in the fresh produce industry is a significant challenge, with the sector relying on temporary and seasonal migrant workers to harvest crops, and competing with the rest of the economy for skilled, management workers. Historically, it has been difficult to attract and retain a local workforce in horticulture, this has been attributed to a number of factors surrounding the nature of the work and the nature of the location of fresh produce production. These factors have had a significant impact on the availability, quality, and retention of a highly productive workforce.

Employment in horticulture can be separated into three distinct functional areas:

1. Harvest Labour: harvesting, picking, packing, planting and maintenance (e.g. pruning) of horticultural crops
2. Technical Expertise: skilled and semi-skilled roles including supervisors, agronomists, food technologists and food safety specialists
3. Management & Administration: farm managers, sales and marketing, category management, human resources and finance and accounting.

While the majority of roles in fresh produce are harvest labour positions, technical and managerial roles in fresh produce employ predominantly Australians and permanent residents in long term, full time roles in regional communities. As industry grows, both in terms of increased production and value, so do the requirements for skilled technical roles in fresh produce businesses.

Examples of these roles in the fresh produce industry are: agronomists, entomologists, horticulture growers, section managers, engineers, quality assurance professionals, food technologists, technicians, electricians, irrigation specialists and machine operators.

The growth of the horticulture industry is creating a significant increase in middle management roles, which are currently not appropriately considered within ANZSCO. These supervisory roles are vital to ongoing industry growth and are priorities for inclusion within ANZSCO.

Recommendations

The AFPA recommends:

- Separating Fruit Or Nut Grower (121213) to “Fruit Grower” and “Nut Grower” as separate occupations
 - Consider removing Table Grapes from Grape Grower and adding to Fruit Grower occupation
- Adding middle management and supervisory occupations to ANZSCO - a number of these roles are included in the Horticulture Industry Labour Agreement and should be included in ANZSCO
- Considering the inclusion of future occupations in the horticulture sector – such as specialised technicians (e.g. Drone Operator) and knowledge workers (e.g. Data Analyst)



Industry Background

The fresh produce (fruit and vegetable) industry is both the fastest growing and one of the most labour-intensive sectors within Australian agriculture. The labour intensity in horticulture is so high due to low levels of available mechanisation compared to other agricultural sectors such as broad acre farming. While finding mechanisation opportunities is a priority for all fresh produce businesses, this solution will not be arrived at in the short term, therefore industry will continue to remain reliant on manual labour for the picking and packing of fruit and vegetables for Australians.

Labour is the largest cost unit in fresh produce businesses, accounting for up to 60 per cent of the total cost of production in some instances¹. Sourcing labour in the fresh produce industry is also a significant challenge with the sector relying on temporary and seasonal migrant workers to harvest crops and competing with the rest of the economy for skilled, management workers. Historically, it has been difficult to attract and retain a local workforce in horticulture, this has been attributed to a number of factors surrounding the nature of the work and the nature of the location of fresh produce production. These factors have had a significant impact on the availability, quality, and retention of a highly productive workforce.

The two key factors are:

- A. Nature of the work
 - Often physical work outside in variable weather conditions
 - Work periods and location dependent on the products being harvested
- B. Nature of the locations
 - Remote – difficult to travel, low level of service and accommodation
 - Regional – competition from other industries, opportunities in capital cities
 - Metropolitan – competition from other industry sectors for capable and skilled people

Over the medium term, there must be the development and implementation of an agricultural workforce strategy which includes specific measures for fresh produce. This strategy must provide a visa, training and regional development framework allowing the fresh produce industry to continue employing significant numbers of Australians while also drawing on international workers through the Seasonal Worker, Pacific Labour and Working Holiday programs during peak harvest times.

Composition of fresh produce workforce

The Australian Bureau of Statistics reports that Australian horticulture employs 72,800 people² across 11,490 individual businesses³. Employment in horticulture can be separated into three distinct functional areas:

1. Harvest Labour: harvesting, picking, packing, planting and maintenance (e.g. pruning) of horticultural crops
2. Technical Expertise: skilled and semi-skilled roles including supervisors, agronomists, food technologists and food safety specialists
3. Management & Administration: farm managers, sales and marketing, category management, human resources and finance and accounting.

The fresh produce workforce is defined by a significant requirement for production/harvest labour roles, relative to output. This is demonstrated below in Figure 1.

¹ Demand for farm workers, ABARES farm survey results 2018

² ABARES (2018), Agricultural commodity statistics 2018

³ ABS (2019). Agricultural Commodities 2017-18 Cat no 7121.0



TOTAL PRODUCTION		
HARVEST LABOUR 80%	TECHNICAL 15%	ADMIN & MANAGEMENT 5%

Figure 1: Functional areas of fresh produce industry's workforce

In order to maintain and grow the output and profitability of the fresh produce industry, it is vital to consider how each component of the overall workforce functions. Workforce solutions and planning should be targeted at the three distinct areas of the overall fresh produce workforce:

1. The Harvest Workforce
2. Technical Roles
3. Managerial and Administrative Roles

While the majority of roles in fresh produce are dominated by harvest labour positions in number, technical and managerial roles in fresh produce employ predominantly Australians and permanent residents in long term, full time roles in regional communities. As industry grows, both in terms of increased production and value, so do the requirements for skilled technical roles in fresh produce businesses.

Examples of these roles in the fresh produce industry are: agronomists, entomologists, horticulture growers, section managers, engineers, quality assurance professionals, food technologists, technicians, electricians, irrigation specialists and machine operators.

While many of these roles are filled by Australians and permanent residents, the sector faces significant challenges in encouraging Australians to move to regional communities, even for ongoing fulltime roles. Further, the specialised skill sets of a number of technical roles in produce means it can be challenging to access these skills in the current domestic labour market.

The Government's policy framework must support skills and training programs which ensure people are equipped to be job ready. The Government's immigration program must recognise the skills, experience and expertise required for the continued growth of the fresh produce industry, including through skilled migration agreements.

Discussion Paper Questions

1. **Are there agricultural sector occupations currently included in ANZSCO that are not accurately described? For each occupation, please propose a new title and/or definition for the occupation, including any changes to alternative titles, specialisations, licencing or registration requirements.**

There are two main disparities within the current ANZSCO; the combination of Fruit and Nut growers as "Fruit or Nut Grower" and the combination of Wine and Table Grape growers as "Grape Grower".

It is recommended to separate these categories to have Fruit Grower and Nut Grower categories, however the relevant skill level and specialisations within existing framework is appropriate. Table Grape grower may also be considered under Fruit Grower, rather than as it's own occupation or in combination with Wine Grapes.



2. Are there agricultural sector occupations in ANZSCO that do not accurately reflect the occupation’s skill level?

There is a challenge within the current skill level qualifications required for the Fruit or Nut Grower (121213), Grape Grower (121215) and Vegetable Grower (121221) occupations. These occupations currently require a bachelor level degree or 5 years relevant experience. Many Australian Fruit, Vegetable and Nut growers do not possess a formal Bachelor degree, rather they have significant on farm and industry experience. It may be more appropriate to consider suitable qualifications for these occupations to be Diploma level and/or 5 years of relevant experience.

3. Are there occupations in your industry, sector or business that should be separately identified in ANZSCO?

As Australian horticulture farms have evolved there has become an increasing need for a layer of middle management and supervision. As farms have grown in size and across products there is no longer a single manager or ‘grower’ in many businesses. The current ANZSCO does not have appropriate provision for supervisory roles.

These supervisory or middle management roles are best articulated in the Horticulture Industry Labour Agreement (HILA) as Facility Supervisor, Horticulture Section Manager, Section Supervisor, Production Horticulture Supervisor and Machinery Supervisor. The relevant descriptions and skill level associated with these occupations in the HILA are accurate.

Priority occupations from HILA not currently identified in ANZSCO

Occupation	ANZSCO Code or nearest equivalent	ANZSCO Skill Level
Facility Supervisor	070499*	2
Horticulture Section Manager	070499*	5
Section Supervisor	070499*	4
Production Horticulture Supervisor	070499*	4
Machinery Supervisor	149999*	4

Additional occupations listed in the HILA should be considered for inclusion in ANZSCO as the roles in the horticulture sector are best articulated in this agreement, there is however an immediate gap for middle management roles that should be considered as a priority.

4. Are there occupations that are emerging, or you anticipate will emerge, in the next 5 to 10 years in your industry, sector or business?

As Australia’s horticulture sector grows and adopts new technology and innovation there will be increasing requirements for skilled knowledge workers and specialised technicians. Examples of these roles include:

- Consumer and Data Analyst
- Food Safety Technician
- Food Technologist
- Robotics Technician and Robotics Programmer
- Drone Operators/ technician
- Irrigation Technician



5. Are there occupations that are declining, or you anticipate will decline, in the next 5 to 10 years in your industry, sector or business? For each declining occupation, please explain what is driving the decline of the occupation.

It is unlikely that there will be a decline in occupations with the horticulture sector. While there may be a perception that harvest work roles may decline over time with improvements in technology and mechanisation, this is unlikely to occur in a meaningful way within the next 5 to 10 years.

6. Are there further issues in relation to ANZSCO that you would like to provide feedback on?

In order to best reflect ongoing changes to employment in the sector more regular reviews or a greater ability to refresh and update ANZSCO would be beneficial to industry.



Appendix – Howe Farming Enterprise Feedback

Comments on ANZSCO review

We thank the Department of Agriculture, Water and the Environment to allow us to comment and provide the feedback regarding ANZSCO codes for agriculture.

Company background

Howe Farming Enterprises Pty Ltd is situated on the Atherton Tablelands, near the townships of Walkamin and Mareeba (inland from Cairns, QLD). The crops we farm are bananas, avocados, sugar cane, coffee, maize, blueberries, soya beans, cow peas, cotton and peanuts – we will be expanding to lemons and mandarins over the coming months.

The company owns four banana farms with separate farming areas, packing sheds and workshop areas. Our company currently has over 4,000 acres of working farmland and employs 500+ people year-round. Numbers do swell up in busier harvesting times to 600+ workers. We expect the growth in our workforce over the next 5 years to be between 20-25%, as we rapidly expand and diversify.

Harvest operations run year-round. Our company has four large pack-houses where bananas are packed into cartons for shipping to market. The most recent addition is a state of the art 7000 sq/m multi-crop packing facility at 1687 Chewko Road, Walkamin. Due to COVID-19 border restrictions, and an acute skills shortage, this facility is currently working at minimum capacity.

Produce is harvested and then packed into cartons. We are required to cool the product to around 15°C to send to market. Howe Farming Enterprises installed an additional ninety-six pallet produce cold room facility in early 2007 to meet a market requirement for post-harvest cooling. Cold room space exceeds three hundred pallet spaces over all sites. A new digital temperature control system has also been installed and commissioned as a part of the new cold rooms project.

Researching and investing in the latest technological advancements, we are designing state of the art digital field and pack-house systems which will assist us in crop, packing and employee management for future operations.

Workforce

We currently employ Australians, workers from the Seasonal Worker Programme, skilled-sponsored employees on 457 visas, and working holiday makers to assist us with harvesting and packing crops. COVID-19 border lockdowns have presented unforeseen challenges for us over the last 14 months, as the working holiday-maker numbers diminished drastically. The pandemic highlighted the fact that Australians are not willing to relocate to the area and undertake long term employment in the agricultural industry. We have an in-depth induction program and ongoing on-the-job training programs for all newly commencing, and current employees. We upskill employees on a regular basis. The company has an extensive training program including weekly toolbox talks, regular updating of safe work procedures, job assessments against job specific competencies and cross-training of farm jobs.

We adhere to several Quality Assurance programs (HARPS, HACCP and Freshcare) and are SEDEX accredited to ensure that our systems are ethically driven, and our produce is of the highest quality. We pride our company on the extent of our workplace health and safety regimen.



Feedback on ANZSCO: our comments

- 1. Are there agricultural sector occupations currently included in ANZSCO that are not accurately described? For each occupation, please propose a new title and/or definition for the occupation, including any changes to alternative titles, specialisations, licencing or registration requirements.**

We are aware that ANZSCO is a pure classification document and is not designed for the purposes of Skilled Migration. It is a mere classification tool. Our industry is constantly evolving and getting more legally compliant, sophisticated, and complex. New tasks for position descriptions are added whenever there are new industry standards. Compliance requirements are introduced by various government departments, industry groups, consumer watchdogs and retailers selling our produce, almost on a monthly basis.

If ANZSCO becomes a fluid classification system, reviewed yearly, only then would it become a useful tool for Skilled Migration purposes. In our humble opinion, no skilled employee of our organisation would perform only the outlined tasks of their position as listed in ANZSCO, including our Managing director Mr Dennis Howe. For example, an Agronomist in our office answering phones is not an Office Assistant, just because that task is being performed by them at that point in time. Conversely, an Administration Officer may be required to stack cartons in the pack shed, drive a tractor or be trained to GPS a new planting in the paddock.

The Department of Home Affairs and their processing officers who assess skilled migration cases take ANZSCO guidelines literally and apply the rigidity of ANZSCO to refuse some migration cases – occasionally, with blanket refusals for the whole industry. ANZSCO should be applied with flexibility.

What we have seen since the Skilled Migration program moved from the ASCO to ANZSCO classification of occupations, is that the ANZSCO pigeonhole for middle management and supervisors on farms has disappeared completely. Farm Overseer 4611-11 ASCO disappeared completely when ASCO moved to ANZSCO, the latter not recognising middle management or supervisor positions on farms – these roles play an essential part in our organisational structure. ANZSCO assumes farms have only Farm managers and Farm hands. Our structure includes Farm managers, 2ICs, Farm supervisors/overseers, and Farm hands.

We believe ANZSCO should implement classifications of occupations currently included in the Horticulture Labour Agreement and make these occupations available on the Skilled Occupation Lists for Skilled Migration purposes. In implementing this strategy, employers would see a much better reflection of organisational structure, inclusive of middle-management roles, in the agricultural industry.

We believe Labour Agreements are cumbersome, time consuming exercises, not reflective on the fast-paced world we currently live in. Skills shortages are highly acute, with many businesses in the agriculture industry advising they will be dumping their produce, as they have no workers to pick produce.

Why not have these occupations that are listed in Horticulture Labour Agreement be in ANZSCO and be available for Skilled Migration regardless? Skills shortages will only increase further with our younger generation relying on relocation to larger cities, rather than working in the paddock or our packing facilities. Thus, creating more barriers by removing ANZSCO positions which would potentially be included on the Skilled Occupations Lists and create gaps in skills shortages as stated above with ASCO to ANZSCO transition.



The list of occupations in Horticulture Labour Agreement (HLA) is at the following link for your perusal: <https://immi.homeaffairs.gov.au/employer-subsite/files/labour-agreement-horticulture.pdf>

RECOMMENDATION: We kindly request that the occupations listed in HLA which are not currently in ANZSCO be included in ANZSCO, as well as re-introducing the Farm Overseer / Farm Supervisor classification back into ANZSCO (as per ASCO).

2. Are there agricultural sector occupations in ANZSCO that do not accurately reflect the occupation’s skill level?

The ANZSCO group of occupations is not reflective of the skills set of a Farm Manager, which in essence affects how the Department of Home Affairs and Skills Assessing bodies view whether the skilled employee meets the criteria for Skills Assessment and migration purposes.

The majority of Farm Managers in Australia would have many years of experience on-farm and the vast majority, we would be bold to say 80-90 %, do not have Bachelor level or equivalent qualification. It is safe to say, most have been farming all their lives.

In our experience, a Department of Home Affairs case officer would look at ANZSCO classification and apply a rigid approach, stating that a Bachelor level qualification relevant to the position is a standard requirement – conversely, nominating valuable, skilled, trained, experienced, dedicated employees on temporary visas in our organisation has been invaluable to our business. Furthermore, skills assessing bodies like VETASSESS do not consider on the job experience. A positive skills assessment is now required for provisional regional employer sponsored program visas. VETASSESS require a person to hold at minimum a Bachelor level degree, relevant to the position qualification in addition to at least 12 months experience post qualification. This presents a major barrier to finding suitable candidates for key positions. Valued employees who may have been working for our organisation for numerous years on temporary visas are now finding themselves unable to get a positive skills assessment for migration.

VETASSESS takes a rigid approach to ANZSCO definition interpretation in their skills assessment matrix, stopping these migrants in their tracks for any provision to permanent residency pathways. This has a significant effect on our operations, as we may offer a legitimate position, but cannot keep these employees who have 10-20 years of experience with no formal qualifications at a Bachelor level.

ANZSCO current	Qualifications currently required	ANZSCO proposed	Qualifications level proposed
121XXXX (the whole group of occupations)	Bachelor level degree OR 5 years relevant experience	121XXXX (the whole group of occupations)	Diploma level qualifications and/or 5 years relevant experience

RECOMMENDATION: Changes to the qualification level requirements to the whole ANZSCO 121XXX Group of occupations reflecting the industry in its current modern climate. We believe there should be employee exchange programs between the government, government agencies and skills assessing bodies, as they have not visited modern agricultural enterprises and have no first-hand experience of what is happening on the ground. These exchanges would bring a better understanding of current scenarios and the problems we face in securing long-term, skilled, dedicated, employees for key management and supervisory positions in our organisation.



3. Are there occupations in your industry, sector or business that should be separately identified in ANZSCO?

Occupation existed in ASCO before classifications of occupations were changed to ANZSCO	Qualification	ANZSCO current	Qualification current	ANZSCO proposed	Qualification required
4611-11 Farm Overseer	The entry requirement for this occupation is an AQF Certificate III or higher qualification and at least 3 years relevant experience	N/A	N/A	Farm Overseer	Diploma level qualification or AQF Certificate III or higher qualification and at least 3 years relevant experience

As previously stated, the above occupation was dropped when ASCO transitioned into ANZSCO and the current list of occupations in Horticulture Labour Agreement (HLA) is more reflective of our industry and the positions which are not in ANZSCO should be included: <https://immi.homeaffairs.gov.au/employer-subsite/files/labour-agreement-horticulture.pdf>

RECOMMENDATION: We kindly request that the occupations listed in HLA which are not currently in ANZSCO be included in ANZSCO, as well as reintroducing Farm Overseer / Farm Supervisor classification back into ANZSCO (as per ASCO).

4. Are there occupations that are emerging, or you anticipate will emerge, in the next 5 to 10 years in your industry, sector or business?

We believe the following occupations will be required:

- Robotics technician
- Robotics programmer
- Drone operators / technicians
- Irrigation systems designer
- Irrigation technician (these are more sophisticated technicians working with remote programs/computer based irrigation systems)



5. Are there occupations that are declining, or you anticipate will decline, in the next 5 to 10 years in your industry, sector or business? For each declining occupation, please explain what is driving the decline of the occupation.

We do not believe low-skilled positions will decline. Emerging skilled occupations, as listed above, should be considered. We believe further occupations should be added to Skilled Occupations Lists for mainstream programs, so employers can benefit from having skilled employees committed to employer sponsored visas.

6. Are there further issues in relation to ANZSCO that you would like to provide feedback on?

Please see our comments above about the rigidity of the ANZSCO and the Department of Home Affairs and Skills Assessment bodies approach in their restrictive and rigid assessment due to the literal approach to ANZSCO.

Summary

Modern farming enterprises should have regular input into ANZSCO. Current classifications are not reflective of our new, fast-paced environment. We recommend that ANZSCO should be fluidly applied, rather than literally, when migration cases are assessed by skills assessing bodies and the Department of Home Affairs.

There should be room for flexible skills-based employment scenarios and classifications should become interactive, according to the requirements of farming organisations for certain skill sets and/or experience without formal qualifications. Farming enterprises have requirements specific to their needs, including Management, Middle Management, labourers and Technical occupations.

Farming enterprises should have the opportunity to decide whom they want to employ based on the skills of an individual and how that individual can fit into an enterprises' organisational structure. Flexibility and guidance from ANZSCO could be utilised by skills assessing bodies and the Department of Home Affairs as a guide, rather than a manual to refuse the visas. The current classification provides negative skills assessment results to individuals with ample practical experience, only to the detriment of modern farming enterprises.

