SUBMISSION TO JOBS & SKILLS AUSTRALIA ON UPDATING THE CORE SKILLS OCCUPATIONS LIST (CSOL)

SEPTEMBER 2025

Joint Submission of the Australian Hotels Association and Accommodation Australia

Contact:
(02) 8666 9015
accommodationaustralia.org
policy@accommodationaustralia.org
Level 4,
131 Macquarie Street, Sydney NSW 2000

Accommodation Australia
A DIVISION OF THE AHA

Contents

Summary of Recommendations 3
Introduction 4
Hotel and Accommodation Sectors 5
Economic Contribution 5
Employment 6
Accommodation and Food Service Industry 6
Accommodation and Pubs Sector 6
Employment projections and their shortcomings 7
Domestic Skills supply 9
Key Policy Considerations 11
Migration should be responsive to skill needs 11
Assessment criteria 12
Meeting State and regional needs 13
Recommendations on key occupations 15
121231 Corporate General Manager 15
132211 Finance Manager 15
161131 Accommodation Service Manager 16
161431 Hotel or Motel Manager 16
161231 Café or Restaurant Manager 16
161232 Catering Manager 18
161631 Senior Chef 18
172331 Facilities Manager 19
172934 Security Manager (Non-ICT) 19
321131 Chefs 19
3223 Cook and pastry cook 20
471531 Bar supervisor 20
471532 Café & Restaurant Supervisor 20
471533 Front Office Supervisor 21
471534 Gaming supervisor 21
471535 Housekeeping supervisor 21
471631 Sommelier 22
About the Australian Hotels Association 24
About Accommodation Australia 24

Summary of Recommendations

1. *As the government continues to use the advice of JSA In assessing skill needs for migration purposes, it is important to remember that the most responsive 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.*
2. *JSA should broaden its Migration Model to increase the importance of an analysis 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.*
3. *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.*
4. *The list of occupations available for permanent employer sponsored migration (ENS visa) should be more extensive than the CSOL in order to accommodate regional and state needs as well as occupations in shortage but which may not have otherwise been assessed as suitable for temporary migration given that permanent migrant outcomes will not be impacted by the temporary nature of employment.*
5. *That JSA include the following occupations, which JSA targets for consultation, on the Core Skills Occupation List:*
    - *Accommodation Service Manager*
    - *Facilities Manager*
    - *Security Manager (Non-ICT*
    - *Senior Chef*
    - *Catering Manager*
    - *Hospitality Supervisory roles including bar, restaurant, housekeeping and front office*
    - *Sommelier*
6. *The following occupations should remain on the CSOL:*
    - *Hotel & Motel Manager*
    - *Chef*
    - *Cook*
    - *Pastry cook*
    - *Finance Managers*
    - *Corporate General Manager*
7. *Even though the Café and Restaurant Manager was not targeted for consultation or review, JSA should re-evaluate this important occupation for inclusion on the CSOL.*

Introduction

The Australia Hotels Association (AHA) and Accommodation Australia (AA) welcome the opportunity to comment on the Core Skills List (CSOL) under review for consultation by Jobs & Skills Australia (JSA). 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 1000 of those properties ranging from independent regional motels and caravan parks to the largest local and international hotel and resort groups.

This submission:

- Highlights the significant economic contribution made by the hotel sector to the economy, its high employment value and the potential growth prospects.
- Reinforces the importance of a migration system that is responsive to skill needs, whether they be local, regional, state or national.
- Comments on the methodology and employment forecasts being used by JSA.
- Focuses on key occupations relating to the hotel industry with particular attention to the occupations identified for the first time in ABS's Occupational Standard Classification of Australia (OSCA).

Our submission has been informed by extensive consultations undertaken with AHA and AA members and surveys undertaken in some States.

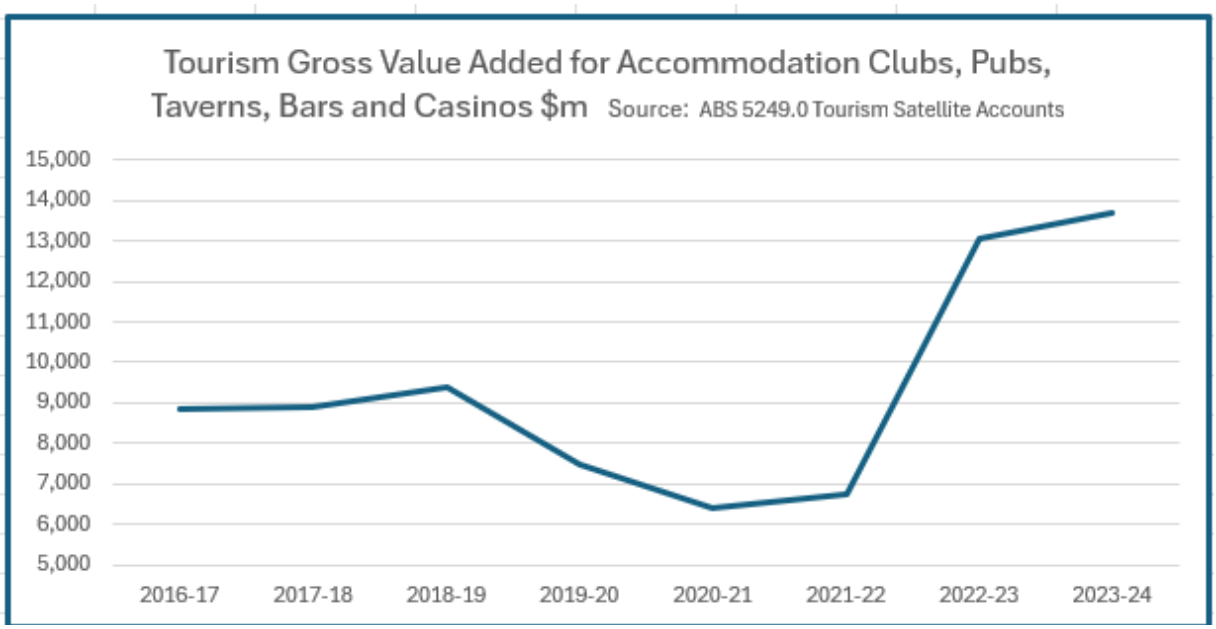
Hotel and Accommodation Sectors

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) for the Accommodation and Food Service Industry in 2023-24 was $63.4[1] billion (compared with $60.4 billion in 2022-23) on revenue of $156.2 billion. Wages and salaries paid by AFS employers to 1.22 million workers in 2023-24 totaled over$39 billion.

According to the ABS Tourism Satellite accounts, the Gross Value Add to tourism from sectors that the AA and AHA represent for 2023-24 was close to $14 billion. As can be seen in Figure 1, the impact of COVID was profound, with the contribution dropping to a low point of $6.4 billion in 2020-21, before recovering so that in 2023-24, the value add to tourism was 46% more than pre-COVID. Most of this GVA to tourism was contributed by the accommodation sector, at $10.1 billion (compared to $13.0 billion In 2022-23 and $9,406 billion pre-COVID) reflecting that most of the economic activity in accommodation is connected to tourism, whereas pubs and clubs service a high proportion of local customers.

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



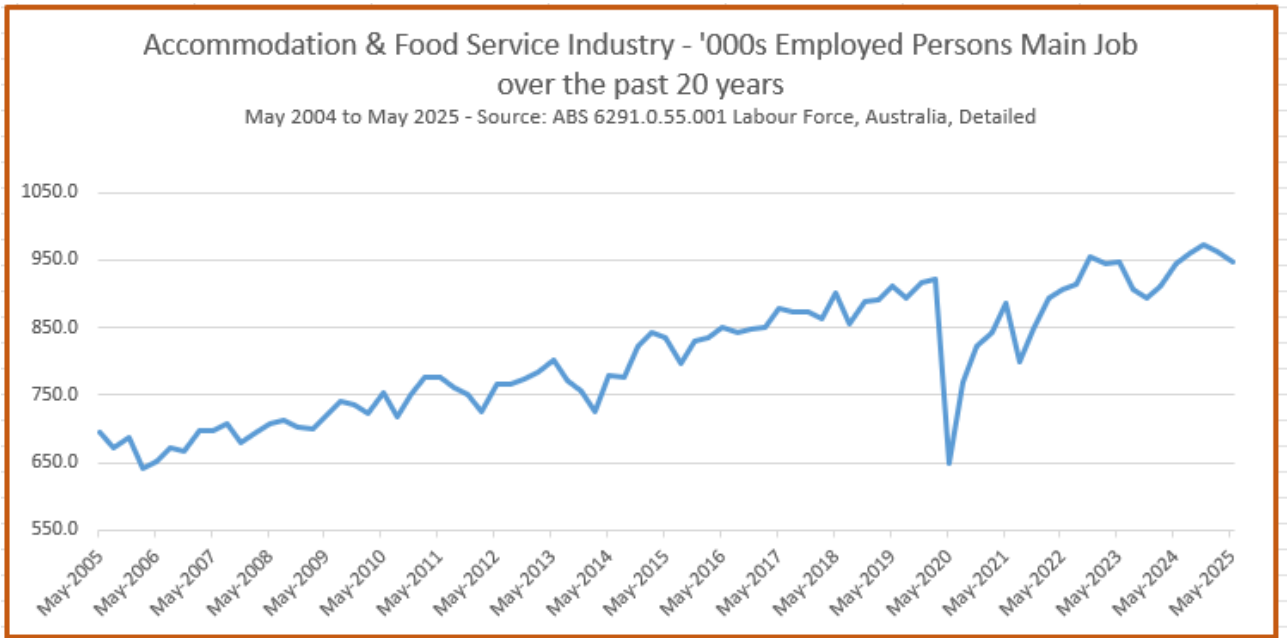
[1] ABS, 81550DO001_202324 Australian Industry, 2023-24 released on 30 May 2025.

Employment

Accommodation and Food Service Industry

As at May 2025, there were 946,500[2] 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.

Figure 2. Employment in the Accommodation and Food Service Industry



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.

Accommodation and Pubs Sector

As a subset of the broader AFS industry, as at May 2025, there were 97,800[3] people who identified that their main job was in the accommodation sector, and 105,200 employed in pubs and taverns.[4] In accommodation, the employment is below the heights of 2016, which in part is as a result of the ongoing difficulties in recruiting housekeeping staff and the consequent increasing trend for some accommodation properties to outsource housekeeping and cleaning services. Statistically (although

[2] ABS, 6291.0.55.001 Labour Force, Detailed, May 2025
[3] ABS, 6291.0.55.001 Labour Force, Detailed, May 2025
[4] As an illustration of how the ABS employment data for our sectors fluctuate, in the ABS figures for February 2025, employment it the accommodation sector was 117,200, and pubs, taverns and bars was 100,500.

not in practice) this trend shifts some sector-dependent jobs into other ABS defined industry categories.

Employment projections and their shortcomings

Although we understand that it is not necessary to quote Jobs & Skills Australia data in a JSA submission, for the sake of context and the benefit of readers beyond JSA, the commissioned Victoria University employment projections to 2034 for industries and occupations are included below. It is also useful to highlight the projections for our sector as they are almost certainly an underestimate for the reasons set out below.

As Table 1 shows, according to the JSA/Victoria Uni projections, the Accommodation and Food Services (AFS) industry is predicted to grow by 54,900 jobs or 5.9% over the five years to May 2029, and 110,800 additional jobs in the ten years to May 2034. However, it is noted that these projections are lower than the previous year and use as a baseline a particularly low ABS employment figure in May 2024. The ABS Labour Force (employed in main job) for May 2024 for the AFS was 944,600, in August 2024 it was 959,900 and by November 2024, 971,700. For the accommodation sector, the picture is even more wildly fluctuating, even though the sector has the highest level of full-time employment of all hospitality sectors. In May 2024, the ABS labour force figure for people in main job in accommodation was 91,800, by August it was 112,900 and as at February 2025 it was 117,200 which is higher than the five-and-ten year JSA projections for 2029 and 2034.

To reinforce concerns about the projections, the comparison between the 2023 and 2024 JSA/Vic Uni projections for the accommodation sector is particularly revealing of the shortcomings. In the first JSA release (based on May 2023 employment data), it was projected that employment in accommodation would reach 113,900 in May 2028 and 123,500 by May 2033, a growth over the ten years of 17.1% - a growth rate well above the all-industry average, and considerably higher than the 7.5% 10-year growth Indicated in the 2024 projections summarised in Table 1. In both years of published JSA projections, the total employment 10-year projection figure is still below the accommodation sector main-job employment total of over 126,000 seen in 2016, despite the considerable growth in revenue and economic contribution of our sector in the last ten years.

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

Industry Employment	Employment - May 2024 ('000)	Projected employment - May 2029	Projected employment - May 2034	Projected 5 yr growth		Projected 10 yr growth	
				('000)	(%)	('000)	(%)
Accommodation and Food Services	929.9	984.8	1,040.6	54.9	5.9%	110.8	11.9%
Accommodation	96.6	97.9	103.9	1.2	1.3%	7.3	7.5%
Pubs, Taverns and Bars	101.9	108.8	115.0	6.9	6.8%	13.2	12.9%

It is understood that the JSA/Vic Uni projections are based on trend growth and do not take into account external growth forecasts or current economic growth trajectory. In our industry, growth in tourism numbers (both domestic and international) has a significant impact on employment growth. Tourism Research Australia has forecast that domestic visitor nights will grow by 16% in the five years to 2029, and expenditure by 19%. The estimated growth in international tourism is even stronger, with predicted growth of 16% in international visitor nights, and 21% in visitor expenditure in the five years to 2029.

In accommodation, one of the most accurate measures of the state of the sector are average occupancy rates published by STR. In the calendar year to July 2025, Australia's average occupancy rate was 71.5% compared to 69.6% for the previous year, which was in turn higher than the 67.1%

experienced in the year to July 2023. This occupancy growth has occurred in the face of an Increase In room supply, with 82 new hotels opening since July 2023, containing 8,585 rooms.[5]

Table 2 shows the JSA/Vic Uni projections for key occupations in hospitality. While useful, they are again likely to be very conservative estimates of the skill and labour needs of our industry. We expect that JSA will take these projections shortcomings into account when assessing the skill needs of our Industry.

Table 2. JSA Employment Projections for key roles

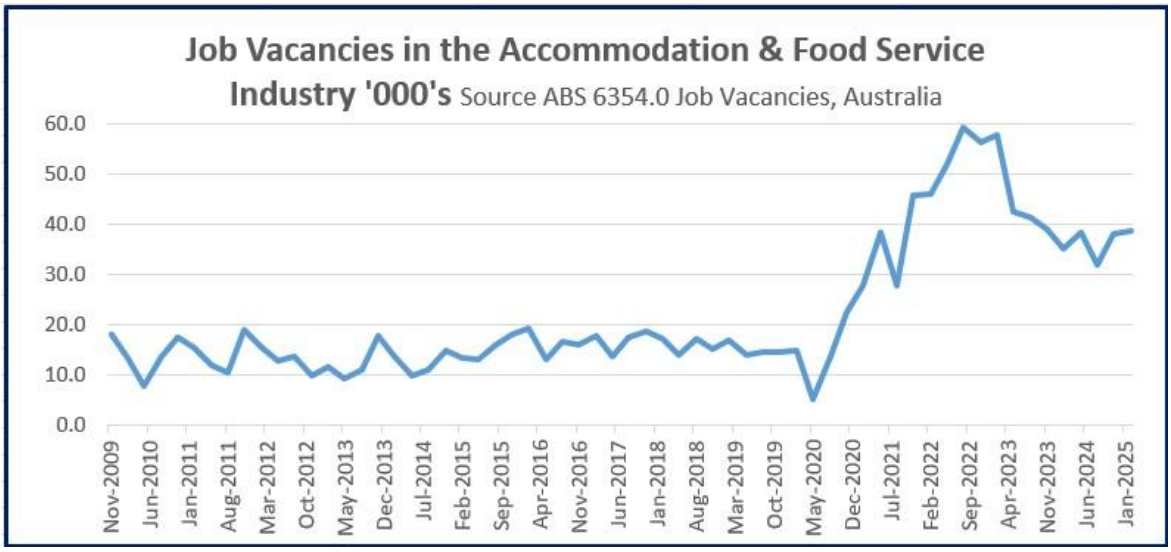
Employment by Occupation	Employment - May 2024 ('000)	Projected employment - May 2029	Projected employment - May 2034	Projected 5 yr growth		Projected 10 yr growth	
				('000)	(%)	('000)	(%)
Food Trades Workers	***214.4***	***230.1***	***244.6***	***15.7***	***7.3%***	***30.2***	***14.1%***
Chefs	128.3	138.5	147.7	10.2	8.0%	19.4	15.1%
Cooks	39.6	42.7	45.6	3.1	7.9%	6.0	15.2%
Bakers and Pastrycooks	30.9	32.3	33.9	1.3	4.3%	3.0	9.6%
Hospitality Workers	***316.2***	***341.2***	***362.1***	*25.0*	*7.9%*	*45.8*	*14.5%*
Waiters	129.6	140.0	148.6	10.3	8.0%	18.9	14.6%
Bar Attendants and Baristas	120.8	130.4	138.3	9.6	7.9%	17.5	14.5%
Cafe Workers	34.8	37.6	39.8	2.7	7.8%	5.0	14.3%
Hotel Service Mgrs (Exec Housekeeper)	9.6	10.3	11.0	0.7	7.1%	1.4	14.5%
Gaming Workers	7.0	7.6	8.1	0.6	8.5%	1.1	15.1%
Food Preparation Assistants	***206.9***	***217.6***	***229.1***	***10.6***	***5.1%***	***22.1***	***10.7%***
Fast Food Cooks	50.4	52.7	55.2	2.4	4.7%	4.8	9.5%
Food Trades Assistants	5.7	5.8	6.0	0.1	2.2%	0.3	5.8%
Kitchenhands	149.8	157.9	166.7	8.1	5.4%	16.9	11.3%
Accommodation and Hospitality Managers	***97.9***	***101.2***	***106.6***	***3.3***	***3.4%***	***8.7***	***8.9%***
Cafe and Restaurant Managers	62.0	64.3	67.6	2.3	3.7%	5.5	8.9%
Hotel and Motel Managers	19.0	19.5	20.5	0.5	2.7%	1.6	8.2%
Other Accommodation and Hospitality Mgrs	7.3	7.5	8.1	0.3	3.7%	0.8	10.9%
Caravan Park and Camping Ground Managers	2.4	2.4	2.6	0.0	1.2%	0.2	7.1%
Accommodation workers							
Housekeepers	33.1	32.7	34.1	- 0.4	-1.3%	0.9	2.8%
Receptionists (not just AFS)	189.5	191.3	202.7	1.8	0.9%	13.2	7.0%

In an AHA WA survey conducted in August 2025, over 73% of respondents indicated they were experiencing staff shortages. Almost a third of members rated the importance of skilled permanent and temporary migrants and working holiday makers at the highest level of very important, and two thirds rated it as important to some extent.

In job vacancy data released by the ABS in April 2025, the Accommodation and Food Service Industry had 38,700 vacancies in February 2025, which was about the same as November 2024 and up from 35,100 in February 2024. This number of vacancies is second only to the Health Care industry and more than twice as many as industries such as manufacturing. The change in vacancies since pre COVID (February 2020 - just when COVID was first impacting) is 162.5%, which is the highest change of all industries. Demonstrating the difficulty still being experienced by members and also the growth in the industry, as the graph below shows, the average quarterly vacancy figure for the AFS industry pre-COVID was much lower than it is today. Since February 2021, job vacancies have been consistently higher each quarter than the larger retail industry.

[5] STR Supply database and occupancy figures. STR Is a specialist international accommodation data company

Figure 3. ABS Job Vacancies in the AFS Industry



We note that in the JSA analysis on internet vacancies, there was a reduction in demand for entry level jobs in the hospitality industry in 2025. This is not consistent with growth in business turnover in the AFS. The latest turnover figures for July 2025 issued by the ABS show that business turnover in July for the AFS was higher than the previous month, rising by 2.5% compared with June. Compared with July 2024, the increase was a significant rise of 10.5%.

Domestic Skills supply

Although almost all key occupations in the AFS industry are not licensed, access to experienced and well-trained job seekers is very important as it injects productive value into the industry's workforce.

Apprenticeships

The most important apprenticeship in hospitality is for cooks and chefs, where training is dominated by Certificate III Commercial Cookery. Much smaller numbers undertake a Certificate IV in cookery or kitchen management. In all other apprenticeship contracts, the training is via a traineeship. However, the numbers undertaking hospitality traineeships have plummeted since employer incentives were removed in July last year. As a result, traineeships are no longer a significant channel for skills development for our industry.

As table 3 shows, the number of apprentice chefs and cooks in training fell by 5.4% in the year to December 2024. This decline was higher than the 2.9% fall in trade apprenticeships in training across all industries.

Table 3. Commercial Cookery Apprenticeships

NCVER Chef Apprentices in training Dec 2020 to Dec 2024						
	2020	2021	2022	2023	2024	2024 v 2023
Chefs Cert IV	380	505	595	500	705	41.0
Cooks Cert III	6785	7120	7025	6035	5475	-9.3
Total	7165	7625	7620	6535	6180	-5.4
NCVER Chef Apprentices commencements year to 31 Dec						
Chefs	215	305	410	250	390	56.0
Cooks	6785	7120	7025	6035	5475	-9.3
Total	7000	7425	7435	6285	5865	-6.7

Without intervention, the number of apprentice chefs currently in training is sure to fall even further as those that commenced in COVID when wage subsidies were in place either drop out or complete their training, and the number of new commencements, which fell 6.7% in the year to 31 December 2024 is not sufficient to replenish this reduction.

Although the industry reports difficulties in attracting people to become cooking apprentices, the above figures show that if the employer incentives are sufficient, the numbers rise.

An analysis of survey results released in March 2025 by NCVER on the outcomes of food trade apprentice non-completers provides some challenges to often-heard presumptions as to why chefs drop out of their apprenticeship. Dealing with the most often mentioned issue up-front, according to the survey only 25.2% of those not completing their food trades apprenticeship cited *low pay and working conditions* as their main reason for discontinuing, compared with 29.7% for the all-industry average. Also, only 11% said that *not liking the type of work* was their main reason, which was only marginally higher than the average of 10.2%. The two reasons given by discontinuing food trade apprentices which were most significantly higher than the average was the *lost/job or apprenticeship discontinued (*17.9% compared with 12.4%) and *personal reasons* (20.3% compared with 16.5%).

Training qualifications

Student enrolments in hospitality qualifications (which includes apprenticeships) have also fallen since COVID. Although the industry and students received government funding support during COVID to fully fund students studying hospitality related programs in VET, the long-term trend of governments, either reflected through national training or partnership agreements, or directly via decisions of State and Territory Governments, has been to reduce the subsidies available to students studying hospitality. These funding decisions, when coupled with the low unemployment rate which has enabled an increase in the number of job seekers securing employment in the industry without training, has resulted in an overall decline in people who have undertaken structured training prior to working in the industry.

The relative lack of funding support for qualifications in our industry has a significant impact on industry productivity. There is a strong bias in vocational funding against industries such as hospitality, where formal training is often seen by funding decision-makers as nice to have rather than need to have. There is no doubt that the lack of formal licensing informs this decision, but the reduction in funding does not take into account the economic benefit to a labour-intensive industry such as hospitality of having access to a formally trained workforce. Clearly, the burden then falls on the employer to train new staff, and the lack of funding support for traineeships means that such training is almost always on-the-job non accredited training.

Key Policy Considerations

There are a number of key policy questions that were raised in last year's submission and remain relevant to the review of the Core Skills Occupation List. Although these go beyond the remit of JSA, they provide a more holistic view of the process and migration policy generally. In summary,

- Employers should be able to sponsor migrants for any skilled occupation when they can demonstrate the skills gap.
- Are migrant outcomes under the new TSMIT/CSIT level yet measurable?
- Need to review the JSA assessment criteria to include an economic assessment of the productivity benefit of migrants, the economic cost of not having access to migrants in skilled occupations and the need to more broadly assess skill needs beyond just shortages to include future skill needs
- Non-responsiveness of the proposed approach to state and regional skill needs

Although these policy questions are largely ones for government, it is important that Jobs & Skills Australia understands the impact of these broader questions on decisions taken about which occupations are on the list.

Migration should be responsive to skill needs

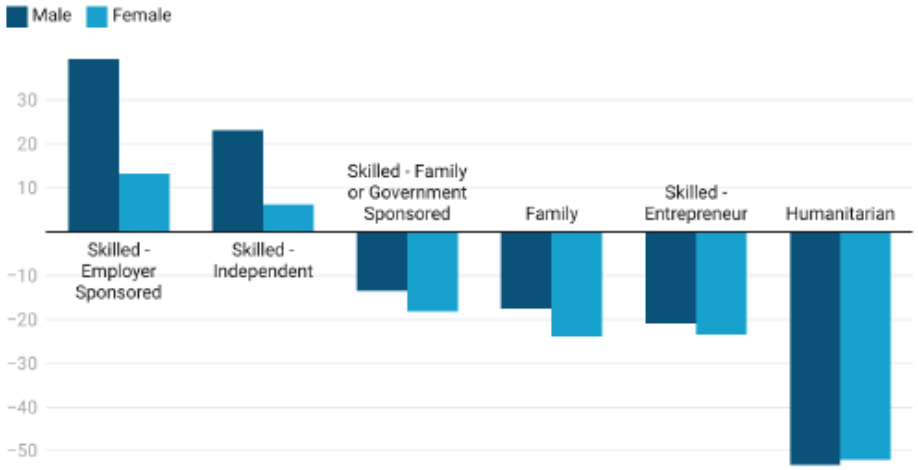
Australia's economy and society have significantly benefited from migration, particularly when the program has been well targeted and responsive to the skill needs of businesses and the economy. A focus on relatively young skilled migrant workers has been highly beneficial to an otherwise aging workforce,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

According to an analysis undertaken by CEDA (Figure 4) 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.

Given these beneficial migrant outcomes, it is important to note that up until mid-2017 employer sponsored migrants, both permanent and temporary, could be sponsored under practically any skilled occupation provided there was a proven skill need 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 national 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 it has also 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.

Figure 4. Wage outcome compared with Australian born workers for migrants arriving 2015-19[6]



Recommendation:

1. *As the government continues to use the advice of JSA in assessing skill needs for migration purposes, it is important to remember that the most responsive 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.*

Although no commentary on migration-related lists should escape reference to this proven and more responsive pre-2017 approach to skill needs as outlined above, the remainder of this submission focuses on the CSOL which is the government's current approach to the middle category of the Skills In Demand temporary migrant visa as well as the employer sponsored permanent ENS scheme.

Assessment criteria

In addition to the Occupational Shortage List, JSA has stated that in line with the Government's migration strategy, an assessment of occupations for the CSOL takes into account "An extensive range of other economic data (covering labour market and migrant outcomes), as well as stakeholder input through surveys; submissions; and feedback from meetings with businesses, unions, industry associations, state and territory governments and other stakeholders (including Australian and migrant workers and jobseekers)."[7]

The JSA Migration Model does not appear to 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 Occupation Shortage List (OSL)

[6] Barker, A & Tofts-Len, S (2024), *Making Better Use of Migrants' Skills*, CEDA
[7] JSA Website, 2025, Core Skills Occupations List (CSOL) Consultation, 2025 Core Skills Occupations List (CSOL) Consultations | Jobs and Skills Australia, accessed 22 September 2025

"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.

For reasons identified above, these future skill needs should be assessed using a broader basis than the JSA/Vic Uni employment projections for our industry. The hospitality industry's future skill needs are significant and will be much greater than the JSA/Vic Uni projections, particularly if and when the forecast growth in tourism driven by the Government's THRIVE 2030 tourism strategy is 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 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. Clearly, migrant outcome analysis is examining the economic impact on the migrant; the counterbalance analysis is identifying the economic impact of the skill shortage on the business and industry if the role is unable to be filled.

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 which occurred on July 2023, and since risen twice to $76,515.

Although we understand that JSA has access to more recent data, it is procedurally unfair if industry is unable to examine this evidence. Even more importantly, it is questionable if enough time has passed for any survey to appropriately test medium to long term economic migrant outcomes following the TSMIT/CSIT rise. We recommend that should more recent data on migration outcomes be used in the assessment, that it be made available to stakeholders.

Recommendation:

2. *Make available evidence of migration outcomes upon which JSA is undertaking its assessment.*
3. *JSA should broaden its Migration Model to increase importance in the analysis 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.*

Meeting State and regional needs

The proposal in the Migration Strategy for a single Core Skills Occupation List is appreciated in the context of reducing complexity, but it has the 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 our consultations it was very clear that skill shortages were particularly being felt in the regions. One of our larger pub group members reports that the average period that a job remains vacant is over one month, but in the rural and regional areas, that length of time blows out to four to six months.

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.

As a logical extension of the need to meet regional needs, even when some occupations are not assessed as being in national shortage, the list of occupations available for permanent migration should be more extensive and inclusive. An assessment of migrant economic outcomes becomes less relevant for permanent migrants as their choices of employment are broader. Café and Restaurant Manager is a good example. Last year, in recommending that restaurant manager not be available for temporary skilled migration, the government's decision to extend the use of the CSOL to permanent employer sponsored migration also denied the opportunity to sponsor restaurant managers into permanent roles. Migration outcome analysis is not nearly as relevant to outcomes for permanent migrants as their options are broader. Temporary visa applications for restaurant managers were up 79% in 2024-25 compared to the previous financial year, even though their eligibility was only available prior to the changes to the CSOL in December. The demand for this occupation is high, particularly in regional Australia, but the list is not responsive to this irrefutable need.

Recommendation:

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.*
5. *The list of occupations available for permanent employer sponsored migration (ENS visa) should be more extensive than the CSOL in order to accommodate regional and state needs as well as occupations in shortage but which may not have otherwise been assessed as suitable for temporary migration given that permanent migrant outcomes will not be impacted by the temporary nature of employment.*

Recommendations on key occupations

We note that JSA has indicated that key focus of this year's CSOL process are new occupations identified by OSCA, as well as occupations not-elsewhere-classified (NEC), and have consequently issued a targeted list for consultation. Although we have primarily focused our comments according to this, there is one occupation that is in critical shortage that falls outside of that focus, namely restaurant. Given the extensive member input that this role is in shortage and of significant importance, our comments include advocacy for this role's inclusion. For completeness, we have also included brief reference to unchanged occupations which are currently on the CSOL to reinforce their importance to the industry and that they need to remain on the CSOL. In all cases, the six digit occupation code used is from OSCA not ANZSCO.

121231 Corporate General Manager

Current status on the Occupation Shortage list – Shortage only in the NT.
Currently on the CSOL (12413 Corporate General Manager)
Not on the targeted list for consultation.

Under OSCA, on the recommendation of our organisation, ABS included a specialisation of Hotel General Manager to reflect the role of general manager of larger and complex accommodation hotels placing it at skill level 1 as compared to the general grouping of hotel and motel managers at skill level 2.

The Accommodation Australia 2024 national salary survey (AA survey) indicates that a Hotel General Manager has an annual salary that ranges from $156,328 on average for a smaller 4-star hotel to an average of $242,771 for a large 5 star CBD hotel.

The accommodation industry is a global industry, where there is significant movement of Hotel GMs across the world's largest hotel chains – both Australians heading overseas to take up positions, and migrants taking up positions here. It is essential that this occupation remain on CSOL.

132211 Finance Manager

Current status on the Occupation Shortage list – Shortage only in the NT.
Currently on the CSOL
Not on the targeted list for consultation.

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.

The AA survey indicates that the average salary of a financial controller within an accommodation hotel ranges from $99,778 for smaller non-CBD 4-star hotels to $162,430 for larger CBD 5-star hotel

It is recommended that finance managers remain on the CSOL

161131 Accommodation Service Manager

Current status on the Occupation Shortage list – Shortage in NSW and Northern Territory.
Currently on the CSOL (Hotel Service Manager – housekeeping only 431411)
On the targeted list for consultation.

On our recommendation, the ABS included this new title and coding for what was previously known as hotel service manager, with the newly defined role embracing all key rooms-related roles including front office manager, Chief Concierge, Guest Services Manager, Executive Housekeeper and hotel services manager. The difficulties in finding experienced skilled workers to fill these 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 previously focusing on executive housekeepers is only assessed as in shortage in NSW and NT.

Member feedback is consistent that the role of Executive Housekeeper is very difficult to fill as the nature of housekeeping does not lend itself to people choosing it as a career path. The role is an essential one in accommodation properties as a clean room is one of the core deliverables for the customer.

Table 4. Accommodation sector national average salary levels for accommodation service managers 2024

	5 star CBD	4 star non CBD
Rooms Division manager	$120,782	$102,346
Front Office Manager	$89,862	$87,500
Chief Concierge/ Guest Experience Mgr	$79,821	$75,000
Executive Housekeeper	$96,530	$93,400

As can be seen from the above, the average salary of all of these managerial roles is close to or above the CSIT and in many cases, hotels are paying well above this to attract and retain experienced managers in these important roles.

It is recommended that Accommodation Service Manager be included on the CSOL.

161431 Hotel or Motel Manager

Current status on the Occupation Shortage list – Shortage nationally and in all states and territories.
Currently on the CSOL (141311)
Not on the targeted list for consultation.

In the hotel and accommodation sector, this occupation encompasses a wide range of job roles that are vitally important to the hotel industry. It is recommended that hotel & motel managers remain on the CSOL.

161231 Café or Restaurant Manager

Current status on the Occupation Shortage list – Shortage only in the Northern Territory.
Currently not on the CSOL
Not on the targeted list for consultation.

Although this is not a focus occupation for JSA analysis this year, we urge reconsideration for this occupation to be included on the CSOL. It is clear through our consultation that our members are experiencing shortages relating to restaurant managers, with strong evidence of difficulties in the regions. This evidence does not align with the national analysis by JSA for the OSL, most likely as a vacancy in this area cannot stay open for long due to its critical nature, and that it is most likely the job is filled by people not really experienced and skilled for the role.

The recent (August 2025) survey of members undertaken by AHA WA indicated that Food & Beverage managers including restaurant and bar manager roles were very hard to fill, with over 20% of respondents indicating that it was extremely hard role to fill, with a further 12% indicating that it was very hard. The overall weighting on a scale of difficulty to fill from 1 to 5 for food and beverage managers was 3.7.

As an indication of how critical it is to fill this important role, the expensive path of migration sponsorship has been frequently used up until the occupation was removed from eligibility in December 2024. In those five months of the financial year 2024-25, café & restaurant manager visa grants were up by 79.4% to 1,680 compared to the whole of the previous financial year.

If last year's JSA exclusion recommendation was more based on migrant outcomes, the comments above under assessment criteria (pp12-13) about whether the migrant outcomes analysis predates the rises in the TSMIT/CSIT are highly relevant. Also, 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 added to the CSOL. This outcome would extend the previous caveats that applied in the migration system to restaurant manager where take-away food managers were not eligible for sponsorship.

Across the pub sector, the Assistant Manager role was often equated with the Café & Restaurant manager occupation. One large pub group reported this month that across their business, they employ 1,000 assistant managers. In the past twelve months, 300 positions were filled with 100 positions still vacant and being recruited for. Highest attrition rates occurred in North Queensland and the NT followed by South Queensland, highlighting acute regional retention challenges and difficulty in filling the shortages. Venues In North Queensland regularly report low applicant volumes, making it difficult to attract and retain skilled staff without overseas sponsorship.

The AA survey in 2024 indicates that the average salary for a food & beverage manager is $91,129 for a 4 star non-CBD hotel and $102,000 in larger 5-star hotels; restaurant managers the average salary is $81,929 for 4-star non CBD hotels to $83,911 for larger 5 star hotels, with some paid over $100,000. Salaries at these levels, that sit above the CSIT, should deliver favourable employment and migrant outcomes, and reflect the improved wage outcomes for managers working within the hotel sector.

It is recommended that Café & Restaurant Managers be included on the CSOL, and if necessary with a caveat that it only applies to restaurant managers operating within a hotel or resort business.

161232 Catering Manager

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

This new OSCA occupation includes a specialisation of banquet manager. Banquet managers or Banquet and MICE (meetings, incentives, convention and events) managers are significant roles within the accommodation and conference sector, managing all venue arrangements for meetings and events clients. In consultations last year, this role was highlighted as one in shortage but not specifically available for migration sponsorship under the old classification system.

The AA survey in 2024 indicates that the average salary for banquet/MICE managers is $84,117 for 4 star non-CBD hotels to $93,412 for larger 5 star hotels, with some paid over $120,000. Salaries at these levels, that sit above the CSIT, should deliver favourable employment and migrant outcomes, and reflect the improved wage outcomes for managers working within the hotel sector.

It is recommended that Catering Managers be included on the CSOL.

161631 Senior Chef

New occupation not on the OSL or CSOL, but chefs overall, of which senior chefs are a part, are on the OSL as in shortage nationally, as well as in every state and territory.
On the targeted list for consultation.

On our recommendation, senior chefs were separated from chefs and coded within the managerial structure due to their broad role in managing all cooking and kitchen staff, and in many cases multiple kitchens across a number of hotels or pubs. Senior chefs include Executive Chefs, Sous Chefs and head Chefs.

The recent (August 2025) survey of members undertaken by AHA WA indicated that Senior Chef roles were the hardest of all roles to fill, with almost 30% of respondents indicating that it was extremely hard, a further 15% very hard, and less than 7% rated it not very hard to fill. The overall weighting on a scale of difficulty to fill from 1 to 5 for Senior chefs was 4.3.

On of the major pub groups reported to us this month that they currently employ 600 Senior chefs, of which 100 positions were filled this year and approximately 20 roles still currently vacant and being recruited for. In one example, in regional South Australia, a senior chef role remained open for five months, and the skills gap was only filled through sponsored migration.

The AA survey in 2024 indicates that the average salary for executive chef is $124,187 for 4 star non-CBD hotels to $132,834 for larger 5 star hotels; for sous chefs, $84,259 to $87,342.

It is critically important that Senior Chefs be added to the CSOL.

172331 Facilities Manager

Current status on the Occupation Shortage list – Not in shortage.
Currently not on the CSOL
On the targeted list for consultation.

Even though it was not included in the CSOL last year, its clearer specialisations in OSCA reinforce the importance of it being reviewed. Included as a specialisation for this occupation in OSCA is Hotel Maintenance Manager, often called in accommodation the Chief Engineer. This role oversees all of the maintenance tasks and staff of the hotel, including electrical, plumbing, air conditioning and building maintenance. Given its strong engineering and construction focus, it is not clear why the occupation is not assessed by JSA as in shortage, given that expertise in these skill areas is in high demand.

The AA survey in 2024 indicates that the average salary for chief engineers is $106,206 for 4 star non CBD hotels to $126,488 for larger 5 star hotels.

It is recommended that Facilities Managers be included on the CSOL.

172934 Security Manager (Non-ICT)

Current status on the Occupational Shortage List (as specialist manager NEC) – Only in shortage in Victoria and NT.
Currently not on the CSOL.
On the targeted list for consultation.

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) was one of the specialisations within the previous ANZSCO occupational code of 139999 Specialist Manager NEC. As it was an NEC, it was left off the CSOL which has created concerns given the difficulty in filling this role.

We recommended to the ABS that Security Manager be separated from the NEC basket. Both accommodation hotels and pubs use Security Managers. In licensed venues, these senior positions play a key role in customer safety, risk management and awareness, as well as ensuring regulatory compliance. In accommodation, guest safety and security are of paramount importance, and security is a key deliverable.

This occupation was previously accessible for migration purposes under the Short-term list, and its removal has created skill shortages in our industry. The AA survey in 2024 indicates that the average salary for security managers is $75,200 for non-CBD 4 star hotels and $100,055 for larger 5 star CBD hotels.

It is recommended that Security Managers (Non ICT) be included on the CSOL

321131 Chefs

Current status on the Occupation Shortage list - In shortage nationally and in every state and territory.
Currently on the CSOL.
Not targeted for consultation.

Alongside the new occupation of Senior Chefs, Chefs (which would include commi, demi and chef de partie, it is critically important this occupation remain on the CSOL.

3223 Cook and pastry cook

Current status on the Occupation Shortage list – Cooks - In shortage nationally and in NSW, Qld, WA and NT; Pastrycooks – in shortage nationally and in every state and territory except NSW.
Both occupations currently on the CSOL.
Both occupations not targeted for consultation.

It is recommended that Cooks and Pastry cooks remain on the CSOL.

471531 Bar supervisor

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

In providing input into the review of ANZSCO last year, AHA/AA gathered data from members to help establish the evidence of the skills and numbers of people in hospitality supervisory roles. The data collected covered almost 50,000 employees – around one quarter of the total accommodation and pub sector employment. This data indicated that there are around 2,000 specialist bar supervisors in our sectors. Additionally, there are around 3,400 duty supervisors, which will either be bar supervisors in the pub sector, or front office in the accommodation sector. Many of the smaller establishments do not have supervisory roles, but for larger members, it is an important bridge between managers and front-line staff, often taking responsibility for entire shifts and opening and closing for venues.

The recent (August 2025) survey of members undertaken by AHA WA indicated that for those who employed supervisors, the task of finding the necessary skill and experience was very difficult, with over one third of respondents indicating that it was extremely hard or very hard role to fill. The overall weighting on a scale of difficulty to fill from 1 to 5 for supervisors including bar supervisors was 4.4.

For most establishments, the CSIT will be a limiting factor in sponsoring supervisors for migration. This will provide an important protection, but for those roles where the market salary is above the CSIT, we recommend that this and all of the key hospitality supervisory role be included on the CSOL.

471532 Café & Restaurant Supervisor

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

In the accommodation sector, this role also equates to the food & beverage supervisor. Member data supplied for the ANZSCO review indicated that there were around 6,000 food and beverage supervisors employed in the hotel and pub sectors.

As at 24 September, across all sectors there are currently 5,201 vacancies on Seek for food and beverage supervisors. It is critical role for the hospitality industry, and often difficult to fill given the level of skills and experience needed to perform the role effectively.

It is recommended that Café & Restaurant supervisor be added to the CSOL.

471533 Front Office Supervisor

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

Member data supplied for the ANZSCO review indicated that there were around 2,800 front office and guest services supervisors employed in the hotel sector. The AA survey in 2024 indicates that the average salary for front office supervisors was $64,286 for 4 star non CBD hotels to $71,866 for larger 5 star hotels.

For most establishments, the CSIT will be a limiting factor in sponsoring supervisors for migration. This will provide an important protection, and for those roles where the market salary is above the CSIT, particularly in situations where the supervisor is performing duty manager responsibilities, we recommend that this supervisory role be included on the CSOL.

471534 Gaming supervisor

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

Member data supplied for the ANZSCO review indicated that there were around 2,000 gaming supervisors employed in the hotel and pub sector. There would be many more in the casinos and clubs sectors of the hospitality industry.

The data on current shortages is more limited. We note that as at 24 September there were 611 current vacancies for gaming supervisors across Australia on Seek. In addition to the expected worker supervisory duties, the gaming supervisor has to be highly skilled in the management of money and also in regulatory compliance in accordance with Australian gaming laws. In this context, members advise that the role is largely promoted from within or sourced within the domestic workforce. In that context, we see no immediate requirement for Gaming Supervisor to be added to the CSOL.

471535 Housekeeping supervisor

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

Even more than executive housekeepers at the manager level, the role of housekeeping supervisor is very difficult to fill. Particularly in the CBD hotels, but also in regional areas such as the Gold Coast, finding people willing to undertake housekeeping work is very challenging, and there is a strong reliance in the cities on international students. These challenges are major limitations on training

housekeepers to become supervisors, and there are often vacancies for this important role. To reinforce this difficulty, there are as at 24 September, 1,985 jobs available on Seek for housekeeping supervisors not just in our sector but also in hospitals, aged care and labour hire.

Member data supplied for the ANZSCO review indicated that there were around 2,500 housekeeping supervisors employed in the hotel sector. This is an underestimate, as many housekeepers and their supervisors are employed within labour hire firms supplying the cleaning and housekeeping workforce for many hotels.

The AA survey in 2024 indicates that the average salary for Housekeeping coordinators or supervisors is $75,124 for 4 star non CBD hotels to $84,458 for larger 5 star hotels.

It is recommended that housekeeping supervisors be included on the CSOL.

471631 Sommelier

New occupation not on the OSL or CSOL.
On the targeted list for consultation.

On our recommendation and evidence, ABS included this job role as a separate OSCA occupation at Skill Level 3. To inform that decision, last year we obtained the following information from a wine industry specialist which highlights the specialist skills required of this occupation:

> **The Court of Master Sommeliers (CMS) Oceania**
>
> This body manages the CMS Program in Oceania and attached is their **2024 CMS Oceania Prospectus** – which is a comprehensive guide to the Court's activities in Australia this year..
>
> Since 2008 in Australia / New Zealand, **1,402 sommeliers** have participated in the examinations resulting in **888 Introductory Sommelier graduates**, **447 Certified Sommelier graduates**, **60 Advanced Level Master Sommeliers** and **7 who have attained the title of Master Sommelier.**
>
> Introductory Sommelier Certificate – 888 Graduates
> Certified Sommelier Certificate – 447 Graduates
> Advanced Sommelier Certificate – 60 Graduates
> Master Sommelier Diploma – 7 Graduates.
>
> **The Wine & Spirit Education Trust (WSET) Australia**
> With the WSET in Australia the graduates in the last year available 2022/2023 were 5,665 Candidates – a 14% growth on the previous year.
>
> Delivering these WSET Programs today across Australia are approximately 40 Approved Program Providers (APPs) with 32 APPs – open to both Trade and Public. (varies but approx. 50/50 Trade and Consumers apparently), and 8 APPs) – open to Trade only – mainly Sommeliers.

Despite this encouraging skills development activity at the domestic level, our members advise that finding sufficient sommeliers to meet the demand in fine dining establishments across Australia is very challenging. As at 23 September 2025, there were 329 jobs vacant for Sommeliers on Seek.

The AA survey in 2024 indicates that the average salary for sommeliers is $85,084 for larger 5 star hotels.

Recommendations:

6. *That JSA include the following occupations, which were targeted for consultation, on the Core Skills Occupation List:*
    - *Accommodation Service Manager*
    - *Facilities manager*
    - *Security Manager (Non-ICT)*
    - *Senior Chef*
    - *Catering Manager*
    - *Hospitality Supervisory roles including bar, restaurant, housekeeping and front office*
    - *Sommelier*

7. *The following occupations should remain on the CSOL:*
    - *Hotel & Motel Manager*
    - *Chef*
    - *Cook*
    - *Pastry cook*
    - *Finance Managers*
    - *Corporate General Manager*

8. *Even though Café and Restaurant Manager was not targeted for consultation, JSA should re-evaluate for inclusion on the CSOL.*

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 250,000 workers, 60% of which are female. 65% of businesses are family owned with family members working in the business

About Accommodation Australia

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 1,000 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 Australian Hotels Association.