



Feedback form – design options for seasonal visas

This template accompanies consultation material on options for the design of two *Seasonal Visas*. Please use this form if you would like to provide further comments in addition to feedback provided during meetings with the Ministry of Business, Innovation and Employment (MBIE).

Written feedback is due by **5pm 9 May 2025**. Email your submission to: melody.nixon@mbie.govt.nz and sebastian.solomann@mbie.govt.nz

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Privacy	☐ Please tick this box if you do not wish your name or contact details above to be included in any information about submissions that MBIE may publish
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Feedback on the proposed AEWV changes

Overview

We are interested in hearing from you:

- How you feel the overall design of the Global Workforce Seasonal Visa (GWSV) and the Surge Capacity Seasonal Visa (SCSV) supports the objectives
- Any alternative or additional conditions or requirements you'd like to suggest

We welcome the introduction of the proposed Global Workforce Seasonal Visa (GWSV) and Surge Capacity Seasonal Visa (SCSV). The overall design appears well-considered and broadly aligned with the stated objectives, including supporting regional economic growth, reducing displacement risk, and maintaining system integrity. We support the targeted approach to visa eligibility and the intention to streamline access for industries with genuine seasonal labour needs.

Global Workforce Seasonal Visa – visa conditions and employer requirements (slide 7)

We are interested in hearing from you:

- Do you support having no maximum continuous stay for this visa, and why/why not?
- Whether you think people on this visa would use the ability to transition to another visa?
- Any other thoughts you have on these settings

- We support the proposed removal of a maximum continuous stay for the Global Workforce Seasonal Visa (GWSV), as it provides flexibility for employers and aligns well with seasonal workforce planning
- It likely that forestry silviculture workers will transition from the GWSV visa onto the AEWV visa. There is high demand for skilled silviculture workers in the regions.
- We recommend extending the maximum stay per 12-month period from nine months to ten months. This would enable employers to complete the full planting programme and also retain workers for other valuable activities such as pruning, which in turn supports skill development and workforce continuity.
- The GWSV offers a valuable pathway for experienced seasonal workers to demonstrate their capability, making it a practical stepping stone to the AEWV. It also allows employers to assess workers' suitability for longer-term roles in the industry

Global Workforce Seasonal Visa - role requirements (slides 8 and 9)

We are interested in hearing from you:

- Views on the proposed criteria that an occupation must meet to be added to the list of roles that can access this visa
- Occupations that you believe meet the proposed criteria, with supporting evidence including:
 - How long these roles are needed for and how it relates to a weather, climate or biologic factor
 - Where the majority of these roles are based
 - Estimated volumes of migrants recruited in these roles generally, and how many return year-on-year
 - What skills and experience are needed for these roles, and the availability of these skillsets domestically
- (If known) what is the contracting model used for suggested seasonal occupations?
- Views on a Labour Market Test exemption for this visa

Currently, New Zealand's forestry sector employs approximately 700 to 800 workers on Accredited Employer Work Visas (AEWV) to carry out essential silviculture tasks such as planting, thinning, pruning, and spraying. This migrant workforce represents around 40% of the total operational silviculture workforce. While this may seem modest compared to other sectors, these roles are critical to maintaining the long-term value and productivity of New Zealand's forests.

The forestry workforce is predominantly regionally based, operating outside major urban centres. Despite extensive and ongoing efforts to recruit New Zealanders into these roles, employers are finding it increasingly difficult to attract and retain local workers. As a result, reliance on skilled migrant labour is growing. A sudden or significant reduction in access to migrant workers would have a severe impact on forest operations and long-term planning.

Over many years, the forestry industry has developed strong, mutually beneficial relationships with seasonal workers from Pacific Island nations. While the initial entry requirements for these roles are primarily physical fitness and a strong work ethic to operate in tough outdoor conditions, workers gain valuable skills and experience over time.

With three years of experience and employer-funded training, these workers become proficient across a wide range of forestry functions. It typically takes 6 to 12 months for new entrants to reach full productivity, and longer still for complex tasks such as chainsaw thinning (which involves directional tree felling). Their contribution is not easily replaced, and the time and cost required to upskill new AEWV workers are considerable.

While some of these roles have seasonal peaks, forestry employers typically aim to provide year-round work, rotating workers across different tasks depending on seasonal demand. This model supports continuity, productivity, and the retention of skilled workers.

A significant challenge facing the industry is the upcoming loss of at least half of the AEWV workforce between late 2025 and mid-2026 due to the mandatory 12-month stand-down period. This poses serious risks to the timely delivery of silviculture work programmes, forest health, and ultimately, export earnings.

To address this, the Forest Industry Contractors Association (FICA) and the Forest Owners Association are working with Stats NZ and Immigration New Zealand to formally recognise the role of 'Silviculture Operator'—a skilled occupation that reflects the capabilities of experienced workers. If accepted onto the National Occupation List (NOL) at Level 3, this designation would help extend visa duration and provide a pathway to residency and much-needed workforce stability.

We believe the proposed Silviculture Operator role meets all the criteria proposed for the Global Workforce Seasonal Visa (GWSV). In addition, we strongly recommend that AEWV holders who have reached their maximum stay be allowed to transition to the GWSV, ideally with a shortened stand-down period of three months. This would allow the industry to retain already trained, experienced, and productive workers.

Finally, we support the proposed labour market test exemption for this visa, and note that New Zealand forestry has an established history of migrant recruitment.

Global Workforce Seasonal Visa – migrant requirements (slide 10)

We are interested in hearing from you:

- Whether three seasons of experience (tailored to the specific season) is on par with people being recruited for these roles?
- Views on the requirement to meet all other AEWV applicant requirements, including the IELTS Level 4 English language standard

We support the requirement for three seasons of experience as it aligns well with the skill progression and competency levels required for the proposed Operational Silviculture role suggested in the response above. Workers with three seasons of experience are generally competent across a range of forestry functions and have received significant employer-funded training.

However, we have serious concerns about the proposed English language requirement, particularly the IELTS Level 4 standard. This requirement presents a barrier for many workers, especially those from Pacific Island countries such as Fiji, which currently accounts for over 50% of the migrant forestry workforce. The test is costly, time-consuming, and in many cases, not proportionate to the role requirements.

For example, silviculture crew members are typically transported to and from the worksite by a crew van, and are supported throughout the workday. On-site, they work as part of a team—planting trees individually but in close proximity to other crew members. The nature of the work is largely physical and task-focused, requiring minimal verbal communication during the day. Many crews also include a bilingual team member (for example fluent in Fijian) who assists with translation and supports new staff, helping to ensure smooth integration and understanding of health, safety, and operational instructions.

We understand the intent behind the English language requirement is to reduce the risk of migrant exploitation. However, we do not believe this is the most effective or targeted solution. In our recent quarterly meeting with MBIE's Labour Inspectorate, it was confirmed that there were no cases of migrant exploitation reported in the forestry sector for that period

The forestry industry is relatively small and well-regulated, with a limited number of employers and close industry networks. Poor employer practices are quickly identified and addressed, often through collaboration between associations like FICA and MBIE. Furthermore, a large number of forestry employers are Safetree certified, and many forest owners operate under FSC certification—both of which include strong labour and compliance audits. These frameworks provide robust protections that help prevent exploitation more effectively than a language test.

We therefore request that the forestry industry be exempt from the IELTS Level 4 requirement, or at a minimum, that exemptions be granted to workers from countries where English is a compulsory subject in the education system, such as Fiji and Singapore, or broadly to workers from the Pacific Islands.

If the English requirement is retained, we recommend:

- Accepting alternative assessments such as Immigration New Zealand’s English-speaking background criteria, which may be more appropriate for this workforce.
- Removing the two-year retesting requirement, which is burdensome and unnecessary. We find it unreasonable to assume that a worker's English proficiency would deteriorate significantly over two years of working in an English-speaking environment.

In summary, we request that you reconsider the necessity and design of the English language requirement for the forestry sector, given the low risk of exploitation, the industry’s compliance frameworks, and the practical realities of the current workforce.

Surge Capacity Seasonal Visa – visa conditions and employer requirements (slide 12)

We are interested in hearing from you:

- Views on the requirement to have a four-month stand-down (noting applications will be able to be lodged for the next season before the stand-down is completed)
- Whether you think people on this visa would use the ability to transition to another visa?
- Any other thoughts you have on these settings

As noted above, forestry silviculture contractors ideally require full-time workers across a range of operational roles, including planting, spraying, pruning, thinning-to-waste, and fire response standby duties. However, the Surge Capacity Seasonal Visa (SCSV) would be most appropriate for entry-level, lower-skilled roles, particularly for those involved in planting operations.

This work aligns with the existing 'Forest Worker' role on the National Occupation List, which corresponds to the ANZSCO 'Bush Regenerator' category. These roles meet all the proposed

criteria for the SCSV, particularly in terms of seasonality, regional location, and established migrant workforce reliance.

We recommend that workers entering on the SCSV for planting roles be able to transition to the AEWV or the GWSV as they gain experience and skills, ideally progressing into the proposed Silviculture Operator role. This would provide a clear, staged pathway for skill development and long-term workforce retention.

Given that the SCSV is an entry-level role, we strongly recommend:

- No English language test requirement, as basic communication needs are typically managed on site, and many feeder countries (e.g. Fiji) have English as a compulsory school subject.
- No prior experience requirement, as experience is often informal and difficult to verify in countries of origin.

We view the SCSV as an important stepping stone, helping workers gain the practical experience needed to qualify for the GWSV or AEWV—or alternatively to identify that they are not suitable for further progression.

Surge Capacity Seasonal Visa – role requirements (slides 13 and 14)

We are interested in hearing from you:

- Views on the proposed criteria that an occupation must meet to be added to the list of roles that can access this visa
- Occupations that you believe meet the proposed criteria, with supporting evidence including:
 - How long these roles are needed for and how it relates to a weather, climate or biologic factor
 - Where the majority of these roles are based
 - Estimated volumes of migrants recruited in these roles generally
 - What skills and experience are needed for these roles, and the availability of these skillsets domestically
- Views on the proposed alternative to the Labour Market Test, including:
 - What you see as the benefits of the employer endorsement approach (compared to the standard Labour Market Test)
 - (If appropriate) whether employers you represent would use the endorsement model

- The proposed workforce plan requirements, and other common elements of workforce plans in your sector

The proposed criteria appear appropriate and well-targeted. As outlined above, they are well suited to entry-level roles such as 'Forest Worker' or 'Bush Regenerator', particularly for planting and releasing activities during New Zealand's peak forestry season, which typically runs from May to September.

These roles are entirely regionally based, occurring across the country in rural and remote areas, with no presence in urban centres. While exact workforce numbers are difficult to formally quantify, we estimate a need for approximately 200 to 300 workers annually, subject to seasonal conditions and forest establishment goals.

The key requirements for these roles are physical fitness and the ability to carry out physically demanding outdoor work, five days a week, often in variable and challenging environmental conditions.

Extensive efforts have been made to employ local staff to do the work, with little success. Locals have shown little interest in performing these roles. We have also struggled to retain local staff in roles. Work attendance and reliability has been an ongoing issue.

Despite extensive efforts to recruit and retain local workers, uptake has been limited. There has been low interest among New Zealanders in these roles, and retention has proven challenging. Issues such as unreliable attendance and low productivity have been persistent, making it difficult to maintain a stable local workforce.

Efforts have been made to develop and trial innovative planting technologies, but with limited success due to challenging terrain, steep slopes, and complex technical constraints that make mechanisation impractical in many forestry environments.

We support the proposed alternative to the Labour Market Test, along with the inclusion of workforce planning obligations. These measures reflect the operational realities of the forestry sector and will help ensure a more sustainable and responsive seasonal workforce pipeline.

Surge Capacity Seasonal Visa – employer or role requirement (slide 15)

We are interested in hearing from you:

- What are the pastoral needs of seasonal workers?
- What pastoral care are employers already providing?
- On the need for pastoral care obligations, and any preference between the options indicated
- Suggestions of alternative obligations that could be considered

Pastoral Care Needs for Seasonal Forestry Workers

Seasonal forestry workers arriving from overseas, require a range of pastoral care support to ensure their wellbeing, integration, and ability to work safely and effectively. The key needs include:

- ***Initial financial support***, as many workers arrive with little or no funds. This includes assistance with:

- Visa application costs
- Flights and airport transfers
- Rent and bond payments
- Setting up utilities (e.g. electricity, Wi-Fi/Starlink for remote areas)
- Access to basic medical care
- Support with a fair and manageable **repayment plan**
- **Provision of suitable clothing** appropriate for outdoor, physical work in variable conditions.
- **Assistance with administrative setup**, including:
 - Opening bank accounts
 - IRD number applications
 - Visa application and compliance management
- **Orientation and training**, covering:
 - Immigration requirements and expectations
 - Cultural and social norms in New Zealand (e.g. shopping, hygiene, cooking, cleaning)
- **Medical and health support**, including:
 - Access to general medical and dental care
 - In-house or remote medical services (e.g. through providers like Dr. Lance O'Sullivan)
 - Help accessing prescriptions in remote locations
- **Daily transportation** to and from worksites
- **Community connection**, including:
 - Introduction to local expat networks
 - Connection to churches, sports teams (e.g. rugby), and community groups
 - Support through existing migrant networks, which are well-established in forestry

*In practice, many forestry contractors **already provide these supports**, as looking after their workers is essential to maintaining productivity, morale, and safety. When workers feel supported, they perform at their best.*

*Given the sector's strong track record in this area, we support a **flexible, light-touch pastoral care model**. For those contractors unable to provide this support, we would also consider a **wage premium of 10% above minimum wage** to be an acceptable alternative.*

Surge Capacity Seasonal Visa – migrant requirements (slides 16 and 17)

We are interested in hearing from insurance providers:

- Do you offer policies that fit the proposed requirements?
- What would such a policy cost users?
- Would you be interested in offering such a policy?

We are interested in hearing from you:

- What degree of experience of you usually look for in people that you might recruit for surge labour seasonal roles?
- Views on the requirement to meet all other AEWV applicant requirements, including the IELTS Level 4 English language standard

We do not support the requirement for mandatory private health insurance for SCSV workers. These workers already contribute to the public system through taxes paid on their earnings, and in the event of workplace injury, are covered under New Zealand's ACC scheme.

Workers undergo comprehensive medical checks, including full medical exams and chest X-rays, as part of their visa application process. The vast majority arrive fit, lean, and healthy, with the most common health issues being minor, such as boils, colds, or dental care needs. These are typically initially covered by the employer and then repaid by the worker via agreed deductions.

If health insurance is to be required, we recommend that it be limited to hospital-level care only, and for a maximum of 12 months, after which workers may become eligible for publicly funded hospital services. In this case, we suggest a low-cost, basic policy similar to those used by backpackers or working holiday visa holders be made available.

These workers are performing roles that are essential to New Zealand's economy, contributing to GDP growth and filling critical labour shortages. Adding more cost and complexity through insurance requirements creates a significant barrier to recruitment, particularly with other jurisdictions like Australia and Canada adopting more welcoming approaches to attracting seasonal labour.

Experience Requirements for the Surge Capacity Seasonal Visa (SCSV)

For roles under the SCSV—such as tree planting—the primary requirements should be physical fitness, reliability, and a strong work ethic, rather than prior formal experience. These are entry-level positions that align with the ANZSCO 'Bush Regenerator' classification (as noted earlier in this submission) and are well suited to on-the-job training. Experience can be effectively gained under direct supervision, and requiring formal work history would unnecessarily restrict access to capable candidates who are otherwise well suited to the role.

English Language Requirement

As detailed earlier in this submission, we do not support the inclusion of the **IELTS Level 4 English requirement** for these roles. It presents a barrier to recruitment and is not proportionate to the communication needs of the job or the risk profile of the forestry sector.

Additional feedback

We are interested in hearing from you:

- What other feedback do you have on these proposals?

As noted earlier, the forestry sector primarily seeks year-round workers, rather than purely seasonal labour. While we acknowledge the current immigration settings, we are working within them constructively. If the proposed Silviculture Operator role is successfully added to the National Occupation List at Level 3, alongside continued access to the AEWV, the new seasonal visa pathways (with the recommended adjustments), and an ongoing commitment to employing New Zealand residents, we believe employers will have sufficient flexibility and tools to manage their workforce effectively. This combination should enable the industry to meet its obligations for productivity, health and safety, and long-term sustainability.