



## Review of Essential Skills in Demand Lists Submission Form

Please note that a new method for reviewing the Essential Skills in Demand lists is being piloted in this review period.

The Department of Labour has selected occupations to be reviewed on the basis of an Expression of Interest process, which closed on 15 July 2011.

Submissions will only be accepted in relation to the selected occupations. Please refer to the list of occupations being reviewed, attached as an appendix to this form.

When completing this submission form, it is important that you refer to the Preliminary Evidence Indicator Report (PIER) prepared by the Department of Labour for the relevant occupation. PIERs for each of the occupations under review are on the website [immigration.govt.nz/essentialskills](http://immigration.govt.nz/essentialskills).

### Key dates

1 August 2011: Submissions open

5 pm 19 August 2011: Submissions close

### Enquiries and submissions

All enquiries and submissions should be directed to:

Email: [shortagesreview@dol.govt.nz](mailto:shortagesreview@dol.govt.nz)

Mobile: 027 232 3801 (Peter Leniston)

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### Background

The Department of Labour's Policy and Research Group maintains the Essential Skills in Demand (ESID) Lists: the Immediate Skill Shortage List (ISSL); and the Long Term Skill Shortage List (LTSSL). Each list performs a particular immigration policy function, and potential migrants use both lists to understand where the opportunities for work lie in New Zealand.

The lists can be accessed at [immigration.govt.nz/essentialskills](https://immigration.govt.nz/essentialskills).

### Objectives of the Essential Skills in Demand Lists

The ESID lists offer **one** avenue through which employers may recruit skilled migrants<sup>1</sup> to work in New Zealand. In broad terms, the lists are designed to facilitate the entry of appropriately skilled migrants to fill skill shortages and to reduce costs and time delays for employers seeking staff. However, this objective must be balanced by the need to ensure that there are no suitably qualified New Zealand citizens or resident workers available to undertake the work, and that the shortage is 'genuine'.

An occupation may be considered for inclusion on the list provided that:

- there are no suitable New Zealand citizens or resident workers available to undertake the work
- terms and conditions in the New Zealand labour market are not undermined
- development opportunities for New Zealanders are not undermined
- a genuine skill shortage exists, that it is not a recruitment or retention problem
- the government's education, training, employment and economic development policies are supported
- prevailing and anticipated labour market conditions are taken into account, and
- the skills shortage exists across the occupation, despite attempts by industry to train and attract New Zealanders to available jobs.

The ESID lists are **not** designed to cater for lower skilled labour shortages or seasonal labour shortages. Nor are they intended to address recruitment and retention problems arising because the industry cannot, or does not, meet the terms and conditions necessary to recruit sufficient numbers of suitably qualified workers from within the New Zealand workforce.

The lists are reviewed approximately twice a year to ensure that they meet the needs of the changing labour market.

### The Immediate Skill Shortage List

The Immediate Skill Shortage List (ISSL) is for skilled occupations that have an immediate shortage of workers in New Zealand. It is designed to facilitate the approval of temporary work visa applications. If an applicant produces an offer of employment and meets

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<sup>1</sup> A skilled occupation is defined as having an ANZSCO skill level classification of level three or above. More information on ANZSCO can be found here: [www.immigration.govt.nz/anzsco](https://www.immigration.govt.nz/anzsco).

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qualification and work experience requirements for an occupation that is included on the current ISSL, immigration officers will accept that no suitably qualified New Zealand citizens or residents are available.

The ISSL is grouped by the following regions:

- Auckland/Upper North Island
- Waikato/Bay of Plenty
- Central North Island (including Taranaki and Manawatu)
- Wellington
- Canterbury/Upper South Island
- Otago and Southland.

### **The Long Term Skill Shortage List**

The Long Term Skill Shortage List (LTSSL) identifies those skilled occupations where there is an **absolute** (sustained and ongoing) shortage of workers in New Zealand and globally.

People who gain employment in one of these areas may be granted a work visa under the LTSSL Work to Residence policy. The Work to Residence policy enables an applicant to apply for residence after two years, provided that they have remained working in a LTSSL occupation with a base salary of at least NZ\$45,000 and meet standard policy requirements.

Candidates for residence under the Skilled Migrant Category who have an offer of employment, work experience or qualifications in an area of absolute skill shortage identified on the LTSSL, will gain bonus points towards their application for residence.

### **Alternative work visa policies**

Employers may bring in migrant workers for occupations not listed on the ISSL and LTSSL, provided suitable New Zealanders are not available. Other policies that may be used include the Skilled Migrant Category and Talent (Accredited Employers) Policy for permanent residence, and temporary work policies such as Essential Skills Policy.

Employers wanting to recruit from overseas are encouraged to visit the Immigration New Zealand website [www.immigration.govt.nz](http://www.immigration.govt.nz).

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### Pilot of a new ESID review process

The Department of Labour (the Department) is piloting a new process for reviewing the ESID lists, designed to improve the robustness and transparency of the review approach. The pilot does not represent a change to ESID policy per se – the existing policy parameters remain in place.

The pilot process is summarised below:

#### 1) Call for Expressions of Interest

The Department calls for industry stakeholder proposals for occupations to be reviewed. **The closing date for Expressions of Interest for the current review was 5pm, 15 July 2011.**

#### 2) Selection of occupations to be reviewed

The Department assesses the Expression of Interest proposals and selects occupations to be reviewed. The Department may also identify occupations that it wishes to review as a result of its own intelligence gathering. As a general rule, occupations identified by industry stakeholders will take precedence, and the Department will provide the balance of occupations for review. **A list of the occupations selected for the current review is attached as an appendix to this form.**

#### 3) Publication of Preliminary Indicator Evidence Reports (PIERs)

The Department prepares a Preliminary Indicator Evidence Report (PIER) for each occupation selected to be part of the review. The PIER collates relevant statistical data about the occupation and provides a *preliminary view* on the status of the occupation. **The PIERs for this review have been published on [immigration.govt.nz/essentialskills](http://immigration.govt.nz/essentialskills).**

#### 4) Call for Submissions on occupations selected for review

Submissions are sought from industry groups and others about the nature and extent of skill shortages in their occupational setting, as they relate to the selected occupations. **The submission process for this review begins on 1 August 2011 and concludes at 5pm on 19 August 2011.**

#### 5) Wider sector consultation on occupations

Once submissions are received, the Department (using an independent contractor<sup>2</sup>) will undertake any further follow-up with submitters, consultation with government agencies and industry, and additional data analysis that may be required to inform decisions on any changes to the LTSSL and ISSL. The consultation process overlaps with the submission process and will conclude on 26 August 2011.

#### 6) Decisions taken and published

Consistent with past practice, where there is consensus that an immediate skill shortage exists, the Department will recommend that the occupation be added to the ISSL. Where there is a demonstrated absolute (sustained and ongoing) and global long term skill shortage, the Department will recommend that the occupation is added to the LTSSL. There may be cases where the Department does not consider the lists to be the most appropriate response to the shortage, and may recommend an alternative solution.

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<sup>2</sup> Currently Peter Leniston.

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Final decisions on changes to the ISSL will be published on the Department's website in November 2011. Please note that although the process is a pilot one, the decisions taken **will** result in changes to the ESID lists.

### The Submission process

#### What is the purpose of the submission process?

The Department of Labour has selected occupations to review for the ESID lists. Most of these occupations have been proposed by industry stakeholders through the Expressions of Interest process. The Department may also identify occupations that it wishes to review, as a result of its own intelligence gathering.

The Department has prepared Preliminary Indicator Evidence Reports (PIERs) for each occupation under review. These reports draw together statistical data about the occupation around three indicators – skill levels, scale of the occupation and evidence of shortage. On the basis of this information, the Department has formed a **preliminary view** on the status of the occupation. This view is expressed on the front page of the PIER.

The PIER for each occupation being reviewed is available on the Department's website [immigration.govt.nz/essentialskills](http://immigration.govt.nz/essentialskills).

#### Who can make a submission?

The submission process is an opportunity for stakeholders to provide additional information and (potentially) different perspectives on the nature and extent of skill shortages in occupations selected for review. Stakeholder submissions are a vital source of information, helping to inform the Department's final assessment of the status of occupations.

Submissions should be made by coordinated groups and industry stakeholders (for example, employer's groups, trade unions and industry training bodies) and should represent the shared views of those groups and stakeholders. You must show evidence of consultation as part of your submission.

**Note: the submitters of the original Expression of Interest are also expected to provide further information through the submission process – this may add to the case presented and/or respond to the PIER prepared by the Department.**

**Where a review of an occupation has been initiated through the EOI process and subsequently no submissions are received, the Department will not continue with the review process.**

#### Information requirements

The information that you provide is important to our assessment process. You are encouraged to be as specific and detailed as possible when providing information.

We would like to receive information that provides more detail in relation to the indicators reported in the PIER. You may have more up-to-date evidence or other data (for example industry surveys or reports).

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We are also interested in any other factors that you consider make it appropriate to add or remove an occupation from the lists. For example, you may have information on recruitment and retention difficulties or trends in relevant training.

**What will happen to the submissions?**

The Department, using the services of an independent contractor, will consider all submissions received within the stated timeframe. The contractor will undertake any necessary follow-up with submitters and consultation with government agencies and industry groups.

At the end of the consultation process, the contractor will advise the Department of the outcomes of the review. The Department will then make recommendations about each of the occupations to the Head of Immigration (for ISSL) and to the Minister of Immigration (for the LTSSL).

EXAMPLE

## Submission Form

**Please complete this form if you would like to make a submission in respect of one of the occupations currently being reviewed by the Department of Labour. (The list of occupations under review is attached as an appendix to this form)**

**Please complete a separate submission form for each occupation.**

Information provided by stakeholders forms a critical part of the review process and complements the statistical data in the Provisional Indicator Evidence Reports (PIERs).

**Please refer to the relevant PIER for the occupation you are interested in – all PIERs are available at [immigration.govt.nz/essentialskills](http://immigration.govt.nz/essentialskills).**

**Please answer all questions. Incomplete submissions will not be processed.**

Please note that the boxes will auto-extend to accommodate your responses. You may wish to add supporting documents in addition to the information supplied in this form. These may be attached as PDFs.

### Disclosure

Please note that the information provided in this submission will be made available to interested parties on request. This is to promote maximum transparency and to encourage the exchange of information between all stakeholders who contribute to the review process. If the submission, or some of its content, is provided to others for the purposes of information sharing and/or consultation, personal contact details will be treated as confidential.

Information held by the Department, including the information provided in this form, is official information under the Official Information Act 1982. Accordingly, if a request is made for information under that Act, the Department may be required to release this information.

Occupational statistics collected during the course of the review may be used by the Department for other research purposes, but individual employers will not be identified.

### Enquiries and submissions

All enquiries and submissions should be directed to:

Email: [shortagesreview@dol.govt.nz](mailto:shortagesreview@dol.govt.nz)

Mobile: 027 232 3801 (Peter Leniston)

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**1. Background and contact information**

**1a) Who is this submission on behalf of?**

*Provide name of individual, firm, or other organisation*

New Zealand Space Programme (NZSP) - Engineering (Hydroponics) Division

This is a co-ordinated stakeholder response with the following organisations being consulted:

- University of Paeroa (Contact: Bill Green - [b.green@paeroa.ac.nz](mailto:b.green@paeroa.ac.nz))
- Union of Space Engineers (Contact: Sam White - [sam.white@use.co.nz](mailto:sam.white@use.co.nz))
- Lunar Explorations NZ Ltd (Contact: Ann Brown - [abrown@lunar.net.nz](mailto:abrown@lunar.net.nz))
- New Zealand Lunar Occupations Association (Contact: Tim Black - [tim@nzloa.co.nz](mailto:tim@nzloa.co.nz))
- Hydroponics Engineers (NZ Charter) (Contact: George Grey - [geogray@hydroponics.net.nz](mailto:geogray@hydroponics.net.nz))
- Space Explorers Trade Union (Contact: Brian Blue - [bblue@setu.co.nz](mailto:bblue@setu.co.nz))

**1b) Contact details**

*Include phone, email and postal addresses*

A Mann, Human Resources Advisor  
New Zealand Space Programme  
PO Box 123456, Wellington  
[A.Mann@nzsp.govt.nz](mailto:A.Mann@nzsp.govt.nz)  
04 999 0001 (phone)

**1c) Disclosure**

Please confirm that you have read and agree to the terms of the disclosure statement, below.

**Disclosure statement:**

- a. The information contained in this submission, or some of its content, may be provided to others for the purpose of information sharing and /or consultation. If this is the case, personal contact details (individual names, telephone numbers and email addresses) will be treated as confidential.
- b. The information provided in this form is official information under the Official Information Act 1982 and, accordingly, the Department of Labour may be required to release this information if a request is made under that Act.
- c. Occupational statistics collected during the course of the review may be used by the Department of Labour for other research purposes, but

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individual employers will not be identified.

**I have read and agree to the terms of this disclosure statement.**

Name: A Mann

**1d) Briefly describe the main activity and characteristics of the organisation making the submission**

*If a firm, please describe main business activity and number of employees; if another organisation, please describe your organisation's purpose, functions and membership size.*

*If you are making this submission as an individual, please briefly indicate your interest in the occupation your submission relates to.*

The New Zealand Space Programme is a Crown agency who is responsible for New Zealand's civilian space programme as well as aerospace research. The Engineering (Hydroponics) Division are responsible for the lunar hydroponics programme. More information can be found on the agency's website ([www.nzspaceprogramme.govt.nz](http://www.nzspaceprogramme.govt.nz)).

**2. What occupation does this submission refer to?**

**2a) Occupation job title and ANZSCO code**

*Please give the job title and 6-digit ANZSCO code (refer to the relevant PIER).*

233999 Engineering Professionals – Lunar hydroponics engineer

**3. What ESID list status do you think this occupation should have?**

**3a) What ESID list status do you propose this occupation should have?**

- |  |   |
|--|---|
| <input type="checkbox"/> Retention on the ISSL       | <input type="checkbox"/> Retention on the LTSSL           |
| <input type="checkbox"/> Addition to the ISSL        | <input checked="" type="checkbox"/> Addition to the LTSSL |
| <input type="checkbox"/> Removal from the ISSL       | <input type="checkbox"/> Removal from the LTSSL           |
| <input type="checkbox"/> Transfer from ISSL to LTSSL | <input type="checkbox"/> Transfer from LTSSL to ISSL      |

**3b) Does your proposal relate to the whole of New Zealand or only some regions? (ISSL only)**

*Please tick all that apply:*

- Certain regions only:**
- Auckland/Upper North Island
- Waikato/Bay of Plenty

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- |                          |  |
|--------------------------|--|
| <input type="checkbox"/> | Central North Island (including Taranaki and Manawatu) |
| <input type="checkbox"/> | Wellington   |
| <input type="checkbox"/> | Canterbury/Upper South Island (including Westland)     |
| <input type="checkbox"/> | Otago and Southland                                    |
| <input type="checkbox"/> | <b>All of New Zealand</b>                              |

**3c) Give your reasons for the proposed change to the ESID lists**

*In 3 or 4 sentences please briefly summarise the major reasons for your proposal.*

*Note: If you have already provided an Expression of Interest to the Department, you may wish to copy the information provided in response to Question 4(c) on the Expression of Interest form.*

New Zealand's foray into space has begun relatively recently. Our Space Programme (NZSP) is only four years old and one particular emerging area is lunar hydroponics.

Over the next ten years, we will need 100 lunar hydroponics engineers to fill new and emerging positions.

Currently there is one programme being offered by New Zealand by the University of Paeroa in lunar hydroponics. However, this programme is only four years old and only a small number of people graduate in any given year.

Our organisations have attempted to recruit lunar hydroponics engineers in New Zealand but there is only a small group of graduates and most travel to larger space programmes overseas.

**4. Information and data relevant to the review**

We would particularly like to receive information that provides more detail in relation to the indicators reported in the PIER. **Please refer to the relevant PIER when completing this section.**

It is important that the information that you provide is as specific and robust as possible. Please provide details about the source of your information, how many employers or individuals it represents (e.g. survey of 30 employers) and when the information was obtained (e.g. survey undertaken in March 2011).

As a general guide, the Department is looking for evidence that has a **reasonable breadth of coverage** across the industry (i.e. represents the views or situation of a reasonable proportion of employers and/or employees and/or trainers or other stakeholders); and is **specific** (i.e. clearly stated facts).

Evidence should be **able to be substantiated** in some way, for example sourced to a survey, administrative data, or employer/employee feedback collated over time.

**Information that does not meet these standards may not be sufficient to support your case.**

Additional material may be attached on a separate sheet, if necessary. Where you are appending detailed reports or other information please cite these under the relevant headings below.

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**4a) Skill level**

*Please note any comments that you wish to make on the skill section of the relevant PIER.*

We confirm that the qualification and experience requirements mentioned in the PIER are appropriate (ie Masters degree in Lunar Hydroponics AND experience in space travel including a minimum of 2 space walks undertaken within the past two years).

However, we feel that an additional requirement should be added - Lunar Registration with the New Zealand Ministry of Space Exploration.

**Wages**

To be included on the LTSSL, average ordinary time full-time earnings in the occupation must be at least \$45,000 per annum. What evidence can you provide that earnings for this occupation reach or exceed \$45,000 per annum?

*Please provide details of the source and robustness of this information.*

As described further in the submission, the beginning salary for a grade 1 lunar hydroponics engineer is from \$100,000 with a grade 3 hydroponics engineer earning up to \$250,000. Please find attached information on salaries – this information has come from our records and key stakeholders (ie Lunar Explorations NZ Ltd; New Zealand Lunar Occupations Association; Hydroponics Engineers (NZ Charter); Space Explorers Trade Union).

**4b) Scale**

*Please provide any information that may be relevant concerning the 'scale' of the occupation. This could include information on the total number of people employed in this occupation in New Zealand, or the number of work visas your organisation or its members have sought.*

*Please note any other comments that you wish to make on the scale section of the relevant PIER.*

At present, there are 300 lunar hydroponics engineers working in New Zealand. Over the next ten years, we will need 100 lunar hydroponics engineers to fill new and emerging positions in the NZSP, the University of Paeroa and the New Zealand Ministry of Space Exploration. An analysis of data has shown that the number of people being offered work visas has increased every year since 2005 (see attached).

**4c) Shortage**

*Please refer to the shortage section of the relevant PIER. We are interested in your response to the information provided, as well as any additional information (such as industry surveys and reports) you can provide.*

*Describe and provide any additional evidence you have on the question of shortage.*

*For example, if you consider that **there is an occupational shortage**:*

- *evidence of difficulties employers are having recruiting staff (depending on the occupation, difficulty for a single employer is unlikely to be sufficient)*
- *estimated apprentice or graduate trainee numbers and the number of workers leaving or retiring from the industry*

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- *forecasts and reports on the growth of the industry.*

*Alternatively, if you consider that **there is not an occupational shortage:***

- *evidence of suitably trained people available (or soon to be available) to work in the occupation*
- *forecasts and reports on the growth of the industry.*

In general, we agree with the information contained within the PIER for lunar hydroponics engineer. However, we feel that there is more of a skill shortage than detailed in the PIER.

Over the next ten years, we will need 100 lunar hydroponics engineers to fill new and emerging positions in the NZSP, the University of Paeroa and the New Zealand Ministry of Space Exploration (please see attached the projected employment requirements for these organisations).

Currently there is one programme being offered by New Zealand by the University of Paeroa in lunar hydroponics. However, this programme is only four years old and only a small number of people graduate in any given year (more information on the graduation rates over the past two years is attached).

Our organisations have attempted to recruit lunar hydroponics engineers in New Zealand but there is only a small group of graduates and most travel to larger space programmes overseas. A survey of organisations who have lunar hydroponics engineers on staff has shown that of the 20 vacancies that were advertised in New Zealand in the past year, only three were filled (please see attached for more results from the survey).

The number of people in this occupation has increased in the past four years (by 100 percent) and it is forecast that this occupation will grow by 200 percent in the next five years (see attached numbers).

## **5. Other factors relevant to determining whether a change to the ESID lists is appropriate**

In addition to the evidence of shortage, a key aspect of the review process is to consider whether there are **other factors** that make it appropriate to add, or remove, an occupation from the lists. These factors are not included in the data assessment, partly because the range of potential factors is broad, and often robust quantitative measures are not nationally available.

However, those directly involved in an occupation or industry often hold valuable quantitative and qualitative information relevant to the decision-making process. It is therefore important that you provide as much information as you can in the following three areas.

**Remember, please be as specific and detailed as possible and provide the source of your information (e.g. survey, study, administrative data or collated feedback).**

### **5a) Labour market conditions**

The Department **must** be satisfied that the industry has a commitment to the provisions of New Zealand employment legislation available to workers. It is important that the hiring of overseas workers is not being used as a strategy to keep wages or terms and conditions of employment to a minimum.

- i. Describe the **policies and practices** your organisation, or the organisations this submission represents, have in place to ensure the industry meets New Zealand employment legislation (including obligations under the Employment Relations Act 2000, the Health and Safety in Employment Act 1992, the Minimum Wage Act 1983, the Holidays Act 2003, the Parental Leave and Employment Protection Act 1987 and the Human Rights Act 1993). Please provide evidence/examples that demonstrate how these legislative requirements have been met.

All organisations work under all the relevant employment legislation. See attached for evidence that demonstrates how the requirements are being met.

- ii. Provide detailed information on wage **ranges** applicable to this occupation

An idea of salary bands (NZSP) are given below:

Grade 1 Lunar hydroponics engineer: \$100,000-\$150,000

Grade 2 Lunar hydroponics engineer: \$140,000-\$200,000

Grade 3 Lunar hydroponics engineer: \$190,000-\$250,000

Lunar hydroponics engineers are usually recruited at Grade 1, and then move to Grades 2 and 3 through internal promotion. The salaries need to remain competitive and so will increase over time.

- iii. Provide information on **employment terms and conditions** applicable to this occupation (*e.g. working hours, employee benefits*)

This can vary according to organisation but generally the hours are usually 40-50 working hours per week, except when on the New Zealand Moon Base when lunar hydroponics engineers are expected to be available 24 hours a day.

Those working for the NZSP and the New Zealand Ministry of Space Exploration Lunar hydroponics engineers get five weeks of annual leave per year (excluding statutory holidays) and unlimited sick leave. All medical and dental treatments are

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also covered. Similar conditions are offered in other organisations.

- iv. You may also wish to provide information of the following, if relevant:
- information on trends in work hours in response to growing shortages
  - the breadth and scale of shortage, and whether some regions are facing shortages, while others are not (and why this is the case)
  - whether there are barriers such as transport, childcare, or work hours, which employers could address to make working in the occupation more attractive to suitably skilled people?

**5b) Training and industry initiatives**

The Department **must** be satisfied that the industry has a commitment to fully utilising the domestic labour market before the industry considers employing overseas workers.

Your submission **must** include information on the following:

- industry demonstrated commitment to training, and
- industry initiatives put in place to enhance domestic recruitment.

- i. What steps are being taken by the industry and employers to address this shortage? In the short-term? In the long-term?

*This may include data on trends in firm/industry investments in training, information on trainee numbers and people who are currently nearing completion of qualifications.*

The University of Paeroa has recently increased the number of positions open in its lunar hydroponics programme (increased from five a year to ten a year). It has also applied for international recognition of its qualification.

In addition, there has been a concentrated effort by the NZSP and the New Zealand Ministry of Space Exploration to keep engineers in New Zealand by offering bonding programmes (ie the payment of fees in exchange for a certain number of years of service), and to increase the salary bands to make it more attractive to stay in New Zealand.

The industry has set up programmes of on-the-job training to ensure that engineers are kept up-to-date on the latest techniques and practices. They have also guaranteed that the engineers will be able to work in space once a year.

In the long-term, the initiatives mentioned above will be evaluated to see their effectiveness in addressing the skill shortage. If they are working, they will be continued.

- ii. What strategies are in place to recruit New Zealanders?

*Include examples of training and industry initiatives.*

The industry maintains a strong focus on recruiting New Zealanders wherever possible. Efforts include regular advertising of available employment opportunities in "*Lunar Weekly NZ*" and on the Institute of Professional Engineers' website and providing generous scholarships to qualified New Zealand engineers to complete a Masters degree in Lunar Hydroponics.

Other options being considered are working with another university in New Zealand to set up a lunar hydroponics programme, and long-term advertising campaigns to

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encourage young people interested in becoming lunar hydroponics engineers.

- iii. Does your industry have an agreed skills plan? (ie, a plan for upskilling the current workforce and/or potential workforce)?

*If yes, describe the expected outcomes of the plan (or attach a copy).*

- What the goals of the plan?
- What **processes** are in place to achieve the goals?
- What are the **timeframes** for the goals?

Yes (please see attached)

*If your industry does not have an agreed skills plan, what plans are in place to develop one? Within what timeframe?*

N/A

**5c) Wider economic factors**

Wider economic factors may have an influence on occupational shortages. Is there anything else that you would like to comment on?

*For example, are there reasons associated with productivity, innovation or competitiveness that you think the Department should take into consideration? Please provide evidence.*

New Zealand is beginning to lead the field in lunar hydroponics and its applications in harsh climates on earth. This field has the potential to be a \$500+ million a year industry but will be hampered if we do not get qualified and experienced staff.

**The Department of Labour would like to thank you for contributing to this review.**