



ACTU Submission to the Core Skills Occupation List Consultation

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Introduction

Formed in 1927, the Australian Council of Trade Unions (“**the ACTU**”) is the national peak trade union body, consisting of 35 affiliated trade unions with over 1.6 million members. As the representatives of working people, the ACTU welcomes the opportunity to provide a submission to this consultation process.

This submission will relate to the listing of the new OSCA occupation 332134 – Licensed Aircraft Maintenance Engineer (LAME) on the list. It is the view of the ACTU and our affiliated unions with coverage of Aircraft maintenance, the AMWU, AWU and ALAEA, that this occupation is not appropriate for inclusion on the CSOL. Despite the existence of a shortage, it is our view that this occupation is inappropriate for inclusion on the CSOL due to the nature of shortage, the impact that a migration stream would have on the domestic pipeline of workers and the availability of a local workforce currently being denied access to job opportunities. Throughout we will reference the initial results of a survey of the aircraft maintenance workforce currently being undertaken by unions which has received more than 250 responses from AME and LAME workers, both union and non-union, across the nation and industry.

Unions would welcome further discussion regarding this occupation or to provide further context or clarification any of the points we raise below. We also endorse the submissions provided by our affiliated unions which may provide more detail on some matters.

Licensed Aircraft Maintenance Engineers

The Nature of the Shortage.

Unions do not contest that there is currently a shortage of LAME workers in Australia. The shortage has been in evidence for a number of years and is, with no changes, only likely to worsen. However, it is our view that the nature of this shortage, and the somewhat unique occupations structure of the AME workforce means that the listing of this occupation on the CSOL would have negative outcomes and would reduce opportunities for local workers. The current LAME shortage does not fall into any of the currently extant JSA shortage typologies – it has been entirely manufactured by the airline and aircraft maintenance industry. Unions have long, for decades now, warned employers in this sector that they were not providing sufficient apprenticeship opportunities to AMEs nor sufficient job opportunities for AMEs to become LAMEs to meet future workforce needs.

The airlines and aircraft maintenance employers have been aware that this is the reality for some time but have deliberately chosen to maintain that situation, even choosing to worsen it when Covid-19 presented an opportunity to lay workers off, because it lowers their costs in the short-term. An AME can only become a LAME if they are supported to do so by their employer – which means that when employers fail to deliver opportunities for AMEs to be trained or to upskill, they inevitably create a shortage of LAMEs. The shortage of LAMEs should not be considered a shortage of workers, but a deliberate shortage of opportunities provided by industry. In fact, according to our survey 68% of AME or LAMEs who responded (189 out of 277) said that over the course of their employment their employer's commitment to training had either declined (35%) or stayed the same (32%) despite the workforce shortage in the sector. At the same time, 56% (154 of 277) of respondents described their employer's commitment to training or upskilling as 'weak' (35%) or 'very weak' (20%) while only 2% described their commitment as 'very strong'.

Figure 1 – Change in Employer Commitment to Training

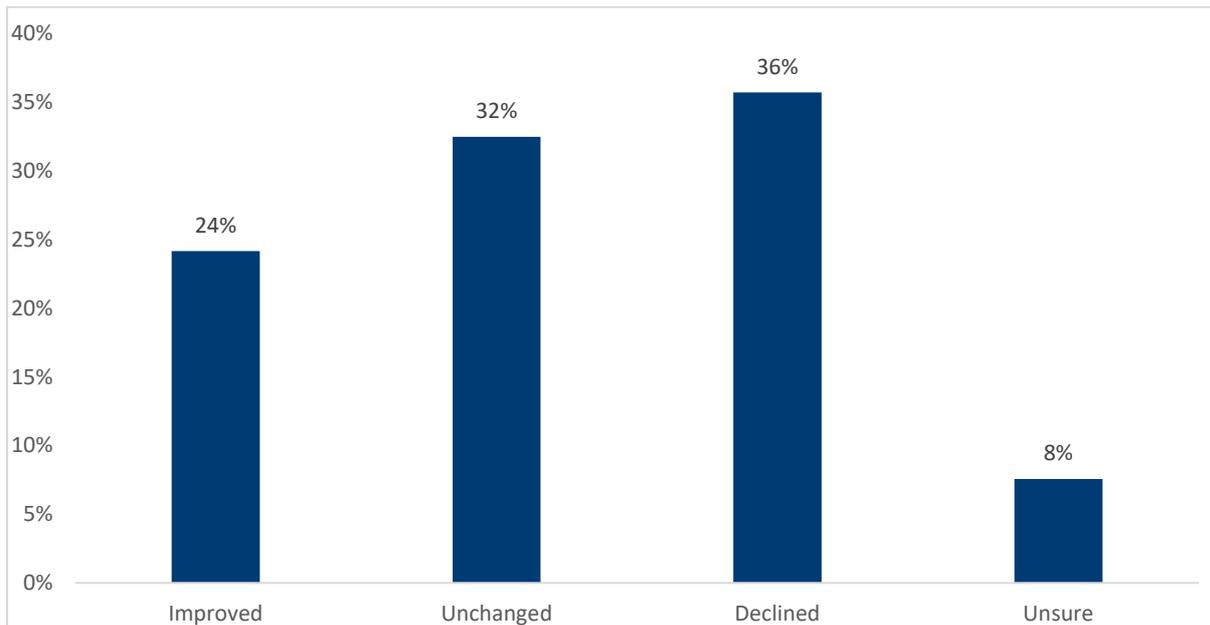
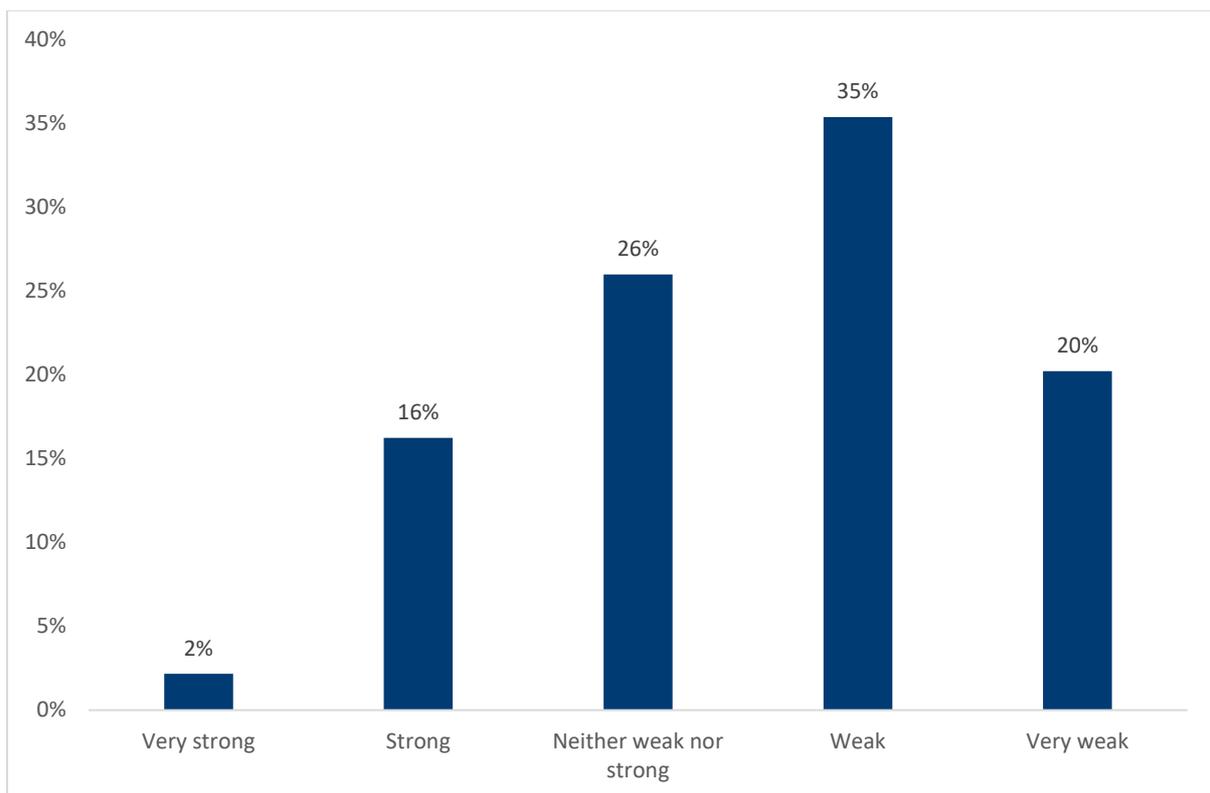


Figure 2 – Employer Commitment to Training.



What is clear from these figures is that, in the face of a worker shortage entirely driven by the availability of training opportunities provided by employers, airlines have either reduced or failed to improve upon their typically weak commitment to training. This is not the response of an industry genuinely interested in addressing their skills shortage. When asked about barriers to becoming a LAME, which 114 of 277 (41%) respondents identified as having faced or facing right now, many respondents identified their employer as that barrier – “Employer Encouragement,

allocation of time to complete studies”, “industry inaction, lack of opportunities”, “company not supporting leave or training costs”, “Limited opportunities”, “Having no company incentive to complete diploma, having to take personal leave as well as pay for upskilling is unheard of in other industries”, “no open vacancies for LAMEs”, “employer limitations to hiring LAMEs” and “not enough LAME positions available at my workplace” representing just a small selection.

Employers in this sector have utterly failed to invest in training their own future workforce. It is our experience that this has been undertaken by employers fully in the belief that when the consequences arrived, they would be able to leverage the critical nature of their industry to procure a pipeline of workers through the migration system. This workforce brinksmanship must not be validated.

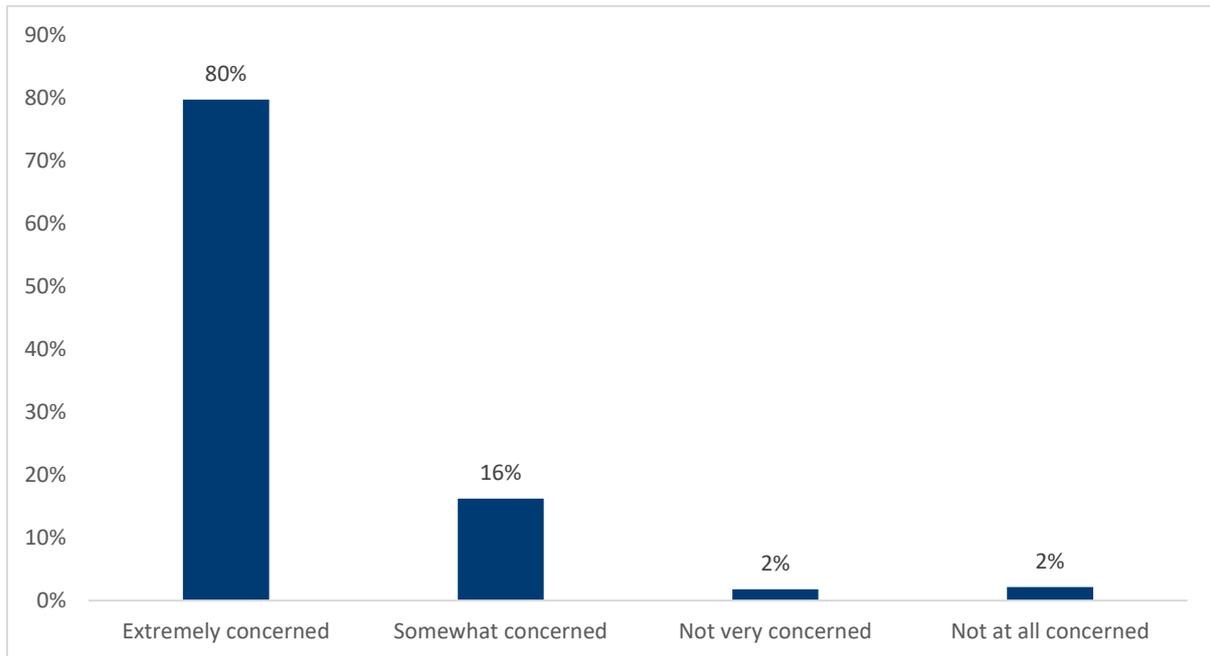
The impact that a migration stream would have on the domestic pipeline

As outlined above, the LAME occupation is fairly unusual in its structure in that it is a progression from another occupation – the AME occupation. This is further exacerbated by the fact that this progression is largely under the control of the employers in the industry. Due to limited availability of courses and the large up-front costs and time requirements while it is possible to become accredited as LAME without the cooperation of an employer, in practice this rarely occurs. The sum total of these realities is that the creation of a simplified pipeline of migrant workers in this occupation would act to massively disrupt the already limited opportunities for Australian workers to become LAMEs. Employers in this sector have already clearly illustrated their unwillingness to endure the short-term costs involved in training sufficient local AMEs to become LAMEs and their lack of commitment to training more broadly. We see no reason to believe that if granted access to a stream of already-trained foreign workers that these employers would not respond by relying entirely on that workforce and even further reduce the opportunities they begrudgingly provide to local AMEs. While we recognise that mere listing of the occupation on the CSOL would not necessarily create this outcome, we are greatly concerned that when combined with the current process being pursued by CASA to automatically recognise a number of non-equivalent overseas licensing regimes this would result in the creation of precisely the significant influx of overseas workers that will displace the current local workforce and replace the future workforce.

In terms of consequences above and beyond the displacement of the local workforce, Australian unions are also deeply concerned that this would result in a significant safety risk for the airline industry and for the Australian public. This concern has been borne out in our survey, with 221 of 277 (80%) of respondents indicated that they would be ‘extremely concerned’ about the impact on aircraft safety arising from foreign LAMEs being permitted to work in Australia without equivalent training and experience. It should be emphasised that unions do not oppose the already existing process by which foreign licence holders are required to undergo assessment and gap training prior to being able to work in Australia. While we would still oppose the listing of

LAMEs on the CSOL if this system was not being altered due to the other issues raised in this submission, we would be less concerned about these specific negative impacts in that scenario.

Figure 3 – Concerns about aircraft safety regarding non-equivalent LAMEs working in Australia.



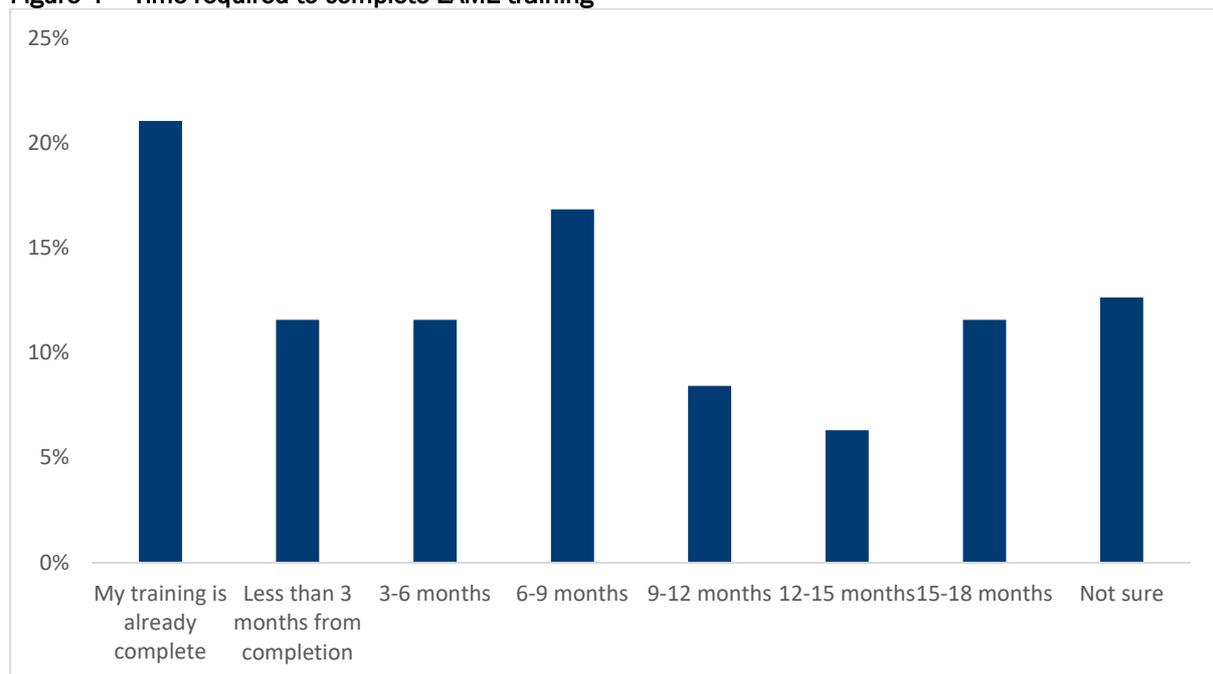
The availability of a local workforce

Unions are aware that one of the key arguments in favour of the listing of LAMEs on the CSOL will be that, despite the obvious bad-faith behaviour of the employers in the sector and the entirely manufactured nature of the shortage, that a shortage does exist and that the training time for a LAME can be significant. This reality, we expect industry participants to argue, means that migrant workers will be required to, at least in short-term, meet this inevitable shortfall. However, it is our belief that this is not the case due to existence of a significant local workforce which could be ready to work as LAMEs in a relatively short period.

Firstly, there exists a difficult to quantify but likely significant group of LAMEs who may also be available to work. During the Covid-19 pandemic airlines laid off and made redundant a significant number of LAMEs – far more than were necessitated by the downturn – as a savings measure. Many of these workers either left the industry as a result or transitioned into early retirement. With sufficient incentives such as better pay and conditions, another response to a workforce shortage we note that the airlines have not attempted, these workers could be brought back into the industry very rapidly. We note that little or no attempt is being made by employers in the sector to actively seek out these workers. While it is difficult to quantify the size of this workforce, although we estimate it to be at least several hundred LAMEs at a single large employer in the industry, its return at least would significantly ameliorate the current shortages faced by some employers.

Our survey results also show that of 277 respondents, 135 (48%) are non-LAMEs (mostly AMEs) who are interested in becoming LAMEs. In fact, only 21 respondents, about 8%, who were not LAMEs indicated they had no interest in becoming a LAME. Of those interested, 95 out of 135 (70%) have already begun to undertake their training to become a LAME and could be ready to work in a relatively short period. As can be seen in Figure 4, the largest cohort in this group have already completed their training and are simply awaiting an opportunity to work as a LAME. In fact, 66 of the 95 respondents (69%) would be ready to work as a LAME either immediately or within less than a year.

Figure 4 – Time required to complete LAME training



This means that of the non-LAMEs surveyed who are interested in becoming LAMEs, just under half would be ready to work as a LAME by this time next year with sufficient investment and interest from industry. If these figures are even close to replicated across the industry, there exists a massive pool of potential LAMEs available for work right now and in the near future. This can only be the case because this is an occupation which workers have been prevented, by their employers, from joining – not one for which there is an actual shortage of workers available.

In summation

The ACTU strongly opposes the inclusion of Licensed Aircraft Maintenance Engineers (LAMEs) on the Core Skills Occupation List. The current shortage is not due to a lack of available workers, but rather a deliberate failure by employers to invest in training and progression pathways for local Aircraft Maintenance Engineers. Reinforcing a migration stream would entrench this neglect, displace a ready and willing domestic workforce, and risk undermining safety standards through facilitating the recognition of non-equivalent overseas qualifications. We would welcome any

further discussions on this matter if we or our affiliated unions can provide any additional information or clarification needed as part of JSA's deliberations on the listing of this occupation.

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