A Revised Methodology for the Australian Apprenticeship Priority List

Prepared by
Jo Sheppard, CEO, QFF
E: qfarmers@qff.org.au

Prepared for
Department of Employment and Workplace Relations

Contents page

This submission is provided to:

Department of Employment and Workplace Relations

Submitted via upload at consultations.dewr.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation

- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallawa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide comment on the Department of Employment and Workplace Relations' discussion paper *A Revised Methodology for the Australian Apprenticeship Priority List*.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

Agriculture is a cornerstone of Queensland's economy and a critical enabler of national priorities such as food security, regional resilience, biosecurity, and the transition to a net zero economy. Agricultural industries face acute and persistent workforce shortages, particularly in technical and trade-equivalent roles that are not well supported by current apprenticeship incentive settings.

The evolution of the Australian Apprenticeship Priority List provides an opportunity to modernise government incentives, so they better reflect the skill needs of regional industries, encourage emerging apprenticeship pathways such as the *Ag Trade* model being developed by *Skills Insight*, and improve participation and completion outcomes across the rural workforce.

QFF supports a revised methodology that is transparent, evidence-based and regionally responsive, anchored to the *National Skills Agreement* (NSA) as the national skills compact, guided by the *Employment White Paper* for productivity and participation objectives, and measured against *Closing the Gap* targets for equity.

The Priority List must act as a policy lever that strengthens national resilience by ensuring the apprenticeship system supports the occupations most critical to Australia's food security and sustainable growth.

Questions for discussion

Question 1. *What, in your view, should be the core purpose and scope of the Priority List?*

QFF strongly believes the Priority List must serve as a targeted policy instrument directing government incentives toward occupations that are critical to Australia's economic resilience, environmental sustainability, and social cohesion. Its core purpose must be to ensure that

apprenticeship pathways remain viable and attractive in sectors of strategic national importance, especially including Ag Trade and food trades.

QFF supports the following scope:

- Explicitly include key agricultural subsectors, including cotton, cane, broadacre, livestock, dairy, horticulture (including irrigation), intensive animals, and conservation and land management, where apprenticeships and trade-equivalent pathways are developing or emerging.

- Address both current workforce shortages and pipeline priorities, supporting occupations where apprenticeship models are under design (for example, through *Skills Insight's Ag Trade* pilot).

- Provide a mechanism for regionally responsive incentives, enabling flexible support for rural and remote labour markets that face systemic barriers to training access and employer participation.

Question 2. *How should Australia's economic and social equity objectives be defined?*

Australia's economic and social equity objectives must reflect a national commitment to building a skilled, inclusive, and future-ready workforce that sustains productivity and participation across all regions and communities. These objectives can be coherently defined through three complimentary policy frameworks:

- The [Employment White Paper](#), which establishes a commitment to sustained, inclusive employment and the preparation of the workforce for structural transitions including digitalisation and the net zero economy.

- The [National Skills Agreement](#), which promotes productivity growth, shared national priorities, and equitable access to vocational training across jurisdictions.

- The [National Agreement on Closing the Gap](#), which ensures First Nations participation, leadership, and outcomes remain central to workforce policy and investment.

QFF recommends that the Priority List be anchored to the NSA as the core skills compact, with priorities inflected by the *Employment White Paper* and benchmarked against *Closing the Gap* targets. This provides an enduring and measurable basis for determining which occupations advance national economic and equity objectives. Macro-economic conditions should be used as guardrails rather than determinants, allowing pre-defined triggers for temporary "flex-up" periods (e.g., drought recovery, inflationary shocks) without the need for constant list revisions.

QFF cautions against blanket exclusion of occupations with low wage premiums. Many entry-level regional and agricultural roles deliver critical public value through food security and biosecurity but offer limited wage margins. Removal of incentives in such occupations would risk shrinking regional pipelines and increasing workforce churn. Instead, eligibility should be retained for system-critical roles while excluding employers with repeated compliance breaches.

Question 3. *To what extent should the Incentive System be able to flex up and down in response to shifting economic conditions and how might this be balanced with ensuring objectivity and certainty?*

This requires an approach that ensures adaptability without undermining confidence in the apprenticeship system, which is particularly vital for small and medium farm businesses operating under long planning cycles. QFF supports structured flexibility within the Incentive System, balancing the need for responsiveness with the certainty required by employers, RTOs and apprentices.

A sound model would include:

- Baseline incentives that remain stable for all occupations on the Priority List, providing certainty for long-term planning.

- Flex-up modules to respond to time-limited shocks such as natural disasters, regional downturns or severe training market thinness.

- Transparent, data-based triggers for activating flex-up support, maintaining objectivity and preventing ad-hoc policy shifts.

Review cadence:

- Conduct annual light reviews of flex settings to ensure alignment with macro-economic and regional conditions.

- Undertake triennial full reviews of baseline eligibility to preserve strategic consistency and avoid volatility for regional employers.

Question 4. *What is the most effective process for identifying and making updates to the Priority List, and at what frequency?*

QFF recommends a co-designed, transparent and evidence-based process for updating the Priority List.

Process:

1. *Jobs and Skills Australia (JSA)* to lead national and regional labour market analysis, incorporating ABS data and state/territory inputs.

2. Convene formal roundtables with *Jobs and Skills Councils* (such as *Skills Insight*) and relevant peak bodies (e.g., QFF) to test evidence, identify emerging trades, and validate regional data.

3. Release proposed updates for targeted public consultation, specifically inviting feedback on regional and sectoral impacts.

With the frequency of:

- Annual updates for minor or incremental changes; and

- Triennial structural reviews to evaluate methodology, principles, and sector coverage.

Question 5. *Should occupations with viable non-apprenticeship pathways have access to incentives?*

QFF supports extending incentives to viable non-apprenticeship pathways where these contribute to national priorities or provide transitional routes into full apprenticeship models. In agriculture, many roles currently rely on traineeships or short-course qualifications that perform an essential function in building the regional labour supply.

Where a role has both a traineeship/VET pathway and an emerging apprenticeship pathway (as with *Ag Trade*), incentives should gradually pivot toward the apprenticeship while maintaining transitional support to prevent workforce gaps. Removing support too early risks destabilising regional training pipelines and deterring employers from participating in new models.

Question 6. *How can the Priority List capture and support new and emerging occupations or apprenticeship pathways?*

QFF proposes that the Priority List include a "Pipeline/Emerging" category to recognise new or evolving apprenticeship pathways. Eligibility should be provisional but structured, with clear criteria such as:

- Demonstrated industry significance and alignment with government priorities (e.g., food security, net zero, biosecurity).

- Employer and RTO readiness.

- Defined competency framework and pilot plan.

This approach would allow the Priority List to support emerging trade models like *Skills Insight's Ag Trade* by offering transitional incentives to de-risk participation in thin markets and remote regions. A provisional listing process ensures innovation and responsiveness without compromising the evidence base or governance integrity.

Question 7. *Should the Priority List have a jurisdictional or regional element to it?*

Workforce shortages in agriculture are highly place-based. The Priority List must incorporate a regional weighting mechanism that accounts for the intensity and persistence of shortages in specific geographic zones.

QFF recommends using state/territory and Statistical Area 4 (SA4) or Remoteness Area (RA) classifications to:

- Recognise ongoing shortages in cropping zones, rangelands, intensive animals, and horticultural districts.

- Ensure RTO viability for remote delivery.

- Avoid national data dilution caused by higher urban supply.

Regional differentiation would align with the *NSA's stewardship model* and support the equitable distribution of training investment across urban and rural Australia. It would also improve recruitment outcomes for First Nations apprentices and regional youth, two key focus groups under *Closing the Gap*.

Question 8. *Should government take a narrower approach to the Priority List to better target incentives to the most critical priorities and shortages?*

QFF supports a more targeted approach where narrowing the Priority List enhances the depth and effectiveness of incentives. However, narrowing must be strategic, not blunt.

The Priority List must:

- Prioritise mission-critical sectors, such as Ag Trade, irrigation, dairy systems, and land and water management, where workforce shortages directly threaten food security or biosecurity.

- Maintain a smaller but purposeful "long tail" of regional and pipeline occupations to sustain niche capabilities.

- Apply evidence thresholds and regional weighting to keep focus on priority needs without excluding essential but low-visibility roles.

A well-targeted list, coupled with higher incentive values for priority trades, will achieve better return on investment and stronger completion outcomes than a broad but diluted model.

Question 9. *Should the Priority List identify different types of occupation shortages (i.e., attraction, completion or retention gaps) so that incentives can be tailored accordingly?*

QFF strongly supports identifying distinct types of shortages (i.e., attraction, completion, and retention gaps) to enable tailored incentives and interventions.

- Attraction gaps: Addressed through sign-on, relocation support, marketing campaigns, and strengthened school-to-work pathways, including structured cadetship programs that provide clear pathways for school leavers incorporating work and study.

- Completion gaps: Supported via mentoring programs, pastoral care, structured onboarding, and employer training in supervision and welfare.

- Retention gaps: Managed through progression pathways (e.g., Cert III-IV), milestone wage incentives, and recognition of higher-skilled "reserved tasks" linked to trade status.

Tailoring incentives in this way is particularly important for agriculture, where workplaces are seasonal, remote, and physically demanding. Distinguishing between attraction and retention drivers will improve apprenticeship outcomes and reduce churn in thin labour markets.

Question 10. *The current Priority List methodology is focused on OSCA Major Groups 3 (Trades and Technicians) and 4 (Community and Personal Service Workers), should this be expanded to other Major Groups and on what basis?*

QFF supports expanding eligibility beyond *OSCA Major Groups 3 (Trades and Technicians)* and *4 (Community and Personal Service Workers)* where justified by clear criteria.

Basis for inclusion:

- Alignment with a recognised or emerging apprenticeship or trade-equivalent pathway (e.g., Ag Trade).

- Demonstrated regional or national criticality to food security, biosecurity, land and water management, or the net zero transition.

- Persistent evidence of shortage validated by JSA and state/industry data.

- Presence of a clear competency framework and structured supervision model.

Examples from agriculture:

- Irrigation technician (horticulture and water management)

- Farm machinery technician (cropping and precision ag)

- Dairy systems technician (automation and herd health)

Including these occupations would recognise the modernisation of agricultural trades and align the Priority List with the *Food Security Strategy* and *Future Made in Australia* agenda.

Additional implementation considerations

QFF offer the following additional implementation considerations:

1. Ag Trade Pilots: Provide time-limited bonus incentives and ring-fenced funding for early adopters and employers operating in thin regional markets.

2. Regional viability: Apply loadings for rural delivery, supervision, and housing/transport costs. Encourage group training and shared apprenticeships to spread employer risk. Address training delivery gaps by ensuring RTO capacity for priority and emerging agricultural trades.

3. Data partnership: Formalise data sharing between *Jobs and Skills Australia*, *Skills Insight*, and QFF to ensure agricultural evidence remains current and region-specific.

4. Equity tracking: Monitor participation by First Nations peoples, women in ag/tech roles, and youth in outer-regional areas. Tie incentive access to inclusive employment practices such as mentoring and safe accommodation.

Conclusion

QFF supports the development of a transparent, evidence-based and regionally adapted methodology for the Australian Apprenticeship Priority List. A reformed list must strategically build the workforce required for national resilience, food security, and regional prosperity.

By anchoring the methodology to the *National Skills Agreement*, guided by the *Employment White Paper* and *Closing the Gap* framework, and by explicitly recognising agricultural and land management trades as national priorities, the Australian Government can ensure the Incentive System drives genuine long-term capability across the economy.

The Queensland agricultural sector stands ready to partner with government, *Jobs and Skills Australia*, and *Skills Insight* to design and deliver the next generation of agricultural apprenticeship pathways that sustain our regions, strengthen food systems, and build Australia's skilled future.

Yours sincerely

Jo Sheppard
Chief Executive Officer

This submission is provided by the Queensland Farmers' Federation

PO Box 12009 George Street, Brisbane Qld 4003
Level 8, 183 North Quay, Brisbane Qld 4000
ABN 44 055 764 488

Contact QFF

E: qfarmers@qff.org.au
P: 07 3837 4720
W: www.qff.org.au