

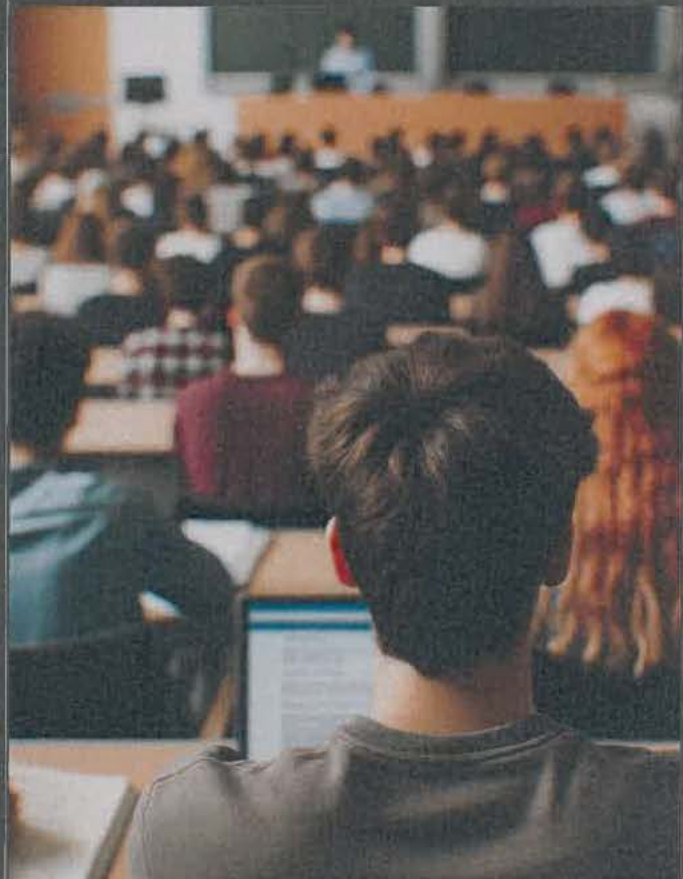
BCA

Business Council of Australia

Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024

Business Council of Australia
Submission

July 2024



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1. Overview

The Business Council of Australia (BCA) welcomes the opportunity to comment on the proposed *Education Services For Overseas Students Amendment (Quality and Integrity) Bill 2024* (the Bill). The Business Council represents around 130 of Australia's major corporations and eight of Australia's top universities. Together they employ over 1.1 million people. A skilled and diverse workforce and a well-targeted migration program are essential for all businesses, the people they serve and for the prosperity of Australia.

The international student sector is our fourth largest export industry, worth \$48 billion in 2023. It provides considerable income for businesses, delivers higher revenues to governments, supports universities to offer high-quality education for domestic students, is critical to maintaining our research capacity, and is a major channel for soft diplomacy, especially in the Asia Pacific region.

The role of international education in generating export revenue is expected to grow as some traditional resources areas decline in a decarbonised economy. The education sector is one where Australia has a clear global competitive advantage.

The BCA strongly advocates for a long-term migration strategy that is supported by infrastructure, planning and housing policies that facilitate growth. Australia is experiencing a housing crisis and the post-COVID surge in temporary migrants, including international students, has been said to exacerbate these pressures.

But the housing crisis has not been caused by international students. Poor regulation, failed planning, skills shortages in construction and high building costs have reduced new housing on the market. No new houses mean higher prices and fierce competition for quality accommodation - further exacerbated by shifts in household size, which have trended down over time and accelerated during the pandemic.

If we are to solve the housing crisis, we need to go to the core of the problem. Short term policy reactions such as a cap on international student numbers will not fix the issue, will detract from real solutions and have negative consequences for the broader economy.

Australia is currently experiencing some of the worst skill shortages in its history. One in three occupations had worker shortages in 2023¹. New and expanding sectors such as the net zero transition, defence, including for AUKUS, construction and manufacturing, and the growing need for care and digital skills have led to skilling pressures across the economy. The university and Vocational Education and Training (VET) sectors are critical to ensuring Australia can reduce these gaps and should be supported to provide quality education to all.

International student revenue is essential for research efforts and the teaching of domestic students. A blunt cap on international student numbers will place these activities at risk. Unless significant additional Government funding is planned for the sector, a cap will also limit universities' ability to meet the Government's ambitious equity and attainment targets, as set out in the Australian Universities Accord.

For these reasons, the BCA opposes managed growth as outlined in the International Education and Skills Strategy Framework (the Framework) and blunt caps on enrolments as set out in the Bill. We support the additional quality and integrity measures in the Bill and believe shutting down unscrupulous providers will go a long way to reducing student numbers. Home Affairs' focused action in this area is underway as part of the Migration Strategy and international student numbers have already dropped 36 per cent from this time last year.

This submission therefore relates primarily to Part 7 Enrolment Limits and Part 8 Automatic Cancellation of Specified Courses. The BCA recommends the Government review the underpinning policy objectives of the Framework and the Bill and reconsider the amendments accordingly. We have provided data-driven analysis and actionable recommendations to assist in this regard.

¹ Jobs and Skills Australia, [Skills Priority List 2023](#)

2. Key recommendations

1. The Government reconsider capping international student numbers and moving away from a demand-led system to 'managed growth'.
 - Remove the international student enrolment limit amendments (Part 7 and Part 8) from the *Education Services for Overseas Students Amendment (Quality and integrity) Bill 2024* (the Bill).
 - Do not undermine a major export revenue source in which Australia is globally competitive.
 - Do not take actions that would cut funding for research and support for Australian students (unless the Government guarantees to make up the funding gap).
2. The Government recognise the role of international students in enhancing Australia's reputation and fostering relations with the region.
 - This principle is at risk with the international student enrolment cap amendment in the Bill.
3. Cease linking international students to the broader housing crisis, noting the mismatch between the annual cap cycle and housing approvals and construction lead times will not solve the current crisis.
 - Remove references to housing provision from the Bill's Explanatory Memorandum and the Framework.
 - Create a national reform fund that makes payments to states and territories to incentivise them to improve productivity through reform measures, including reforms that would unlock more homes.
4. If the Government persists with a managed growth approach to the international student sector, set international student enrolment limits via mission-based compacts between individual universities and the Department of Education or the Australian Tertiary Education Commission, as recommended in the Universities Accord.
 - When setting international student caps, each university's financial position, employment profile and infrastructure costs should be considered.
5. Mandate the Education Minister consult with the Tertiary Education and Quality Standards Agency (TEQSA) and the Minister for Home Affairs as a minimum when setting caps via an instrument and issuing notices.
 - The Bill text should be updated from 'the Minister may consult' to 'the Minister must consult'.
6. Adjust the breach provisions in the Bill to ensure they are proportional and are in line with provider administration processes.
 - The Bill provide a five per cent buffer before registration suspension to account for the inherent uncertainty in the student enrolment process.
 - Facilitate a two-strike warning system for registration suspension rather than an immediate and automatic suspension.
7. Update cap limit decision timings to align with education sector enrolment processes.
 - Interim arrangements should include an 18-month implementation phase (from 31 December 2024 – June 2026)
 - Cap decisions be handed down in June of each year, for implementation by the January/February 18 months later.
8. International student enrolment limits provision of the Bill be reviewed under a sunset clause for 3 years or until the establishment of the Australian Tertiary Education Commission (ATEC).

9. Exclude the highly regulated university and TAFE sectors from additional integrity measure in the Bill.
 - It should use its Migration Strategy as the key driver for addressing short term skills gaps and the ability of international students to meet those needs.
10. Remove the ministerial powers to set international student enrolment limits at the course level (caps should be set at the provider level only).

3. Preserving Australia's fourth largest export

The BCA is deeply concerned about the proposed amendments in the Bill that grant ministerial power to impose limits on international student numbers (Part 7 Enrolment Limits and Part 8 Automatic Cancellation of Specified Courses). Using an education sector integrity bill to shape migration and skills policy is impractical, will lead to unintended consequences and will not achieve the desired outcomes outlined in the Framework.

The Bill will enable the Education Minister to make a legislative instrument specifying the number of international students that may be enrolled at an institutional level (total provider enrolment limit) and at the course or class level (course enrolment limit). In setting enrolment limits, the Minister will consider the relevance of courses to Australia's skills needs within a context of managed growth.

It is extremely important that the Bill align with the public intent the Government has set for the future of the tertiary education sector. As currently drafted, the Bill is a blunt instrument that undermines the Framework and could irreparably damage our fourth largest export sector. The Bill, if passed by Parliament, will grant powers to a minister well beyond what had been proposed in the Australian Universities Accord and the Migration Strategy, to which the BCA made several submissions and was supportive of the Government's response.

The BCA firmly believes the Accord, which was the most significant review of the long-term future of the sector in a decade, should guide the direction of growth and prosperity of our vital higher education sector. As it stands, the Bill reacts to public concerns over housing supply and overall migration numbers that will not address the fundamental sources of the problem.

The BCA recommends the Government not place caps on international student numbers. This includes removing the international student cap amendments (Part 7) from the Bill.

Shutting down unscrupulous providers will go a long way to reducing in student numbers. The Government should focus its efforts in this area as a far more effective mechanism than setting caps on university and TAFE enrolments. We note that this focused action is underway by Home Affairs as part of the Migration Strategy. Visa numbers are already declining significantly, with a 36% drop in study visas granted this year compared to the same period last year².

Considering the undeniable benefit of higher education and international students to our economy – especially at a time of critical skills gaps, persistent inflation and flagging productivity – the BCA believes it is undesirable to 'manage growth' in this demand-driven sector. Cutting university funding through capping a major revenue source with no additional funding will undermine the higher education sector. The Bill is counterproductive.

Universities and the tertiary sector are central to Australia's economic and social progress. They train Australia's future workforce and drive new industries through innovative research. They support our relationships with other countries through international students and collaborations with overseas institutions. They are integral to Australia's soft diplomacy, global reputation, and contribution to capacity building in emerging economies.

Universities' ability to create and disseminate new knowledge and ideas is one of their greatest values to society. Countries that spend a higher percentage of GDP on university research and development have on average greater levels of GDP per capita. Our universities rely on international student fees to fund research, especially in the absence of Government funds.

The presence of international students in our universities also enriches the educational experience of all students. A high-quality Australian education benefits our global community as international students return home powerful champions for Australia. According to Universities Australia, on average, international university

² Around 86,000 study visas were granted to offshore applicants from January through May this year (a nearly 36% decline from 135,000 granted in the same period in 2023). Department of Home Affairs, [Student Visas Granted Pivot table](#)

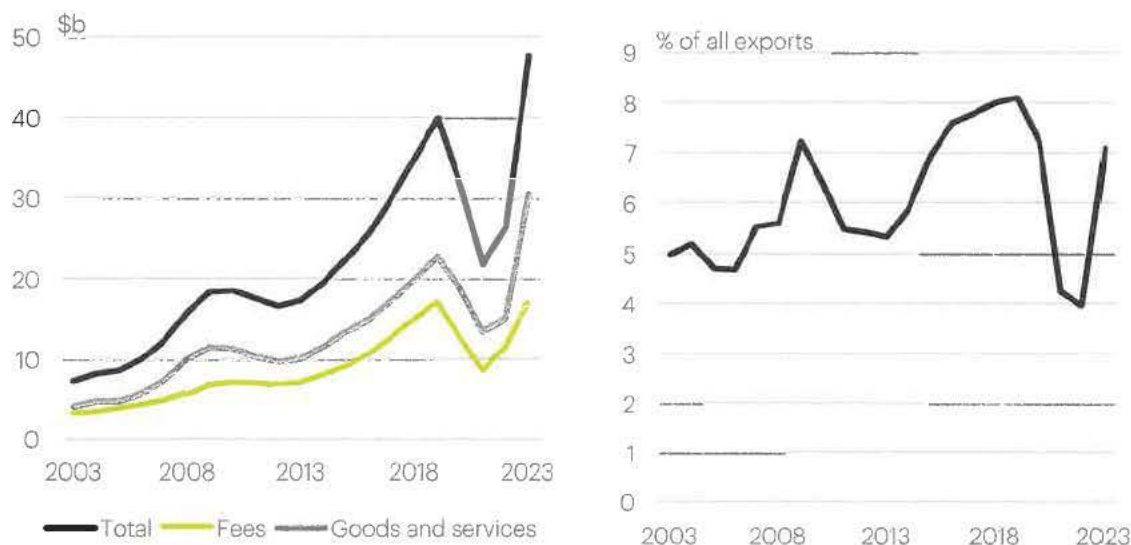
students contribute \$73,000 each year in export revenue, while students in vocational education and training contribute \$34,000.

Australia excels at international education. The sector brought in \$48 billion in export dollars in 2023, employed around 200,000 people, and many more at the margins. Student fees represented \$17 billion, or around 36 per cent of all international student exports. The goods and services consumed by international students were \$31 billion, or around 64 per cent of all international student exports – up from around 56 per cent a decade ago.

International students accounted for almost a quarter of all GDP growth over the year to March 2024.

International student exports were 7.1 per cent of all exports in 2023, up from 5.0 per cent two decades ago. But as a share of all exports, the sector has not recovered to its pre-COVID peak.

Figure 1: Education exports



Case study: Woolworths and International Students

Woolworths is one of Australia's largest private sector employers with over 176,000 staff across Australia. This includes around 5,700 team members who hold student visas at Woolworths Supermarkets, BIG W Discount Department stores and supply chain operations.

International students are valued members of Woolworths Group store and supply chain teams. This was especially the case at the height of the pandemic when low unemployment and high workforce participation resulted in acute shortages in the labour market.

Post-COVID, tangible and pragmatic commitments made by the Government to continue flexibility for student visa holders has meant they can continue making a strong contribution to the business and serve 20 million Australian customers every week.

International students make sure the supermarket shelves are stocked and supply chains can operate efficiently, filling a key gap that remains in Australia's labour market.

3.1 The economic imperative of international students

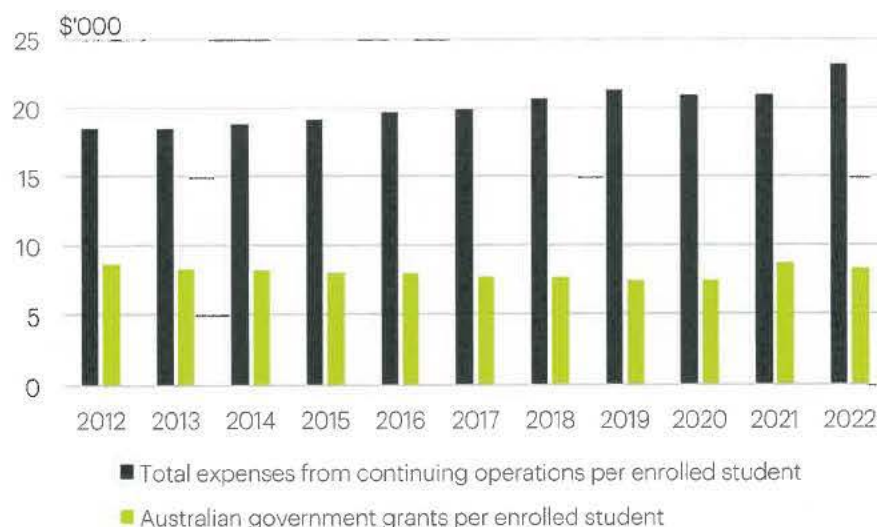
International students are – and always will be – a key part of universities’ funding model. Fees from international students represent the second largest amount of overall university revenue (around \$8.6 billion in 2022)³. With operating costs increasing around 25 per cent over the past decade, universities have had to fill the gap that has not been met by Government to keep their funding steady and educate Australians. Further cuts to such revenue without additional funds from Government will likely lead to reduced services for Australian students.

Australia has seven universities in the top 100 global rankings. Making it into the top 100 requires a world-class research program, given how rankings are calculated. It is this ranking that lifts the quality of education for Australian students, while making our universities a much-desired destination for overseas students.

However research is expensive, and it is the revenue from international students that substantially funds this work. Less students means less revenue and therefore less research, and a consequential drop in the global rankings and potentially as an educational destination of choice. This cascading effect would lead to a major funding shortfall, Australia becoming less competitive in global standings, and ultimately increased pressure for the Government to bridge this funding gap. In the absence of government funding, significant job cuts are inevitable.

The success of Australia’s universities in attracting international students has been a significant undertaking. But we should not assume demand for Australian education will always be strong. Having recently imposed caps, Canada has already slipped as a desirable destination for international student⁴. The Government should consider the impact of capping international students with a mind to the sector’s long-term fiscal stability and growth and Australia’s attractiveness in a competitive international student market.

Figure 2: Total operating expenses and Australian Government grants per enrolled student 2012–2022



³ Department of Education, Finance 2021: Financial Reports of Higher Education Providers Summary Information, Department of Education, Australian Government, 2023.

⁴ IDP Education. (2024). US takes pole position in the eyes of international students. <https://careers.idp.com/news/us-takes-pole-position-international-students>

Recommendation 1

The Government reconsider capping international students and moving away from a demand-led system to 'managed growth'.

- Remove the international student cap amendments (section 7) from the Education Services for Overseas Students Amendment (Quality and integrity) Bill 2024.
- Do not undermine a major export revenue source in which Australia is globally competitive.
- Do not take actions that would cut funding for research and support for Australian students (unless the Government guarantees to make up the funding gap).

4. International students and the housing crisis

The BCA strongly advocates for a holistic migration strategy that integrates infrastructure and housing policies. This strategy must be evidence-based and forward projecting so appropriate planning and funding can be made available.

We are supportive of the Government's focus on delivering more dwelling supply to address the nation's housing needs. As our 2023 paper '[Housing Australia's Talent](#)' showed, there are multiple factors that have impacted housing affordability. These include changes in dwelling size and composition (the number of people sharing a home), as well as the quantity of new housing being brought onto the market to meet demand.

The requirement for universities to provide new housing for international students if they choose to go over their designated cap is a fundamental pillar of the Framework. While there is no mention of housing in the Bill, the Explanatory Memorandum states that "The Minister may also give a notice to a provider under subsection 26C(1) if satisfied that the provider has demonstrated that they have developed, or otherwise made available, additional student accommodation to cater for an increase in student enrolments"⁵.

The debate over international students arises as a consequence of housing supply issues. The requirement to provide additional accommodation for this cohort sends a strong message that international students are a major contributor to the housing crisis. But evidence is contrary to the commentary.

According to Government data, there were around 786,000 international students in Australia last year⁶. That is less than 3 per cent of the nation's total population. It is not far off pre-pandemic levels, when international student numbers were around 756,000 in (2019)⁷. Broader concerns regarding the overall immigration numbers should be addressed through the Government's Migration Strategy which has been well consulted on and is now being implemented.

International students made up around 4 per cent of the rental market in 2021⁸. While this may have changed following the pandemic, it represents only a small share of rental supply. Moreover, international students usually live in apartments and purpose-built student accommodation⁹. This differs from the preferences of families and domestic students, further narrowing the impact of international students on the housing market.

The BCA recognises the value in ensuring international students are provided with appropriate housing. The universities also acknowledge this and have taken measures to help address this demand. But a plethora of external factors make annual cap setting and long-term housing development a difficult pairing.

New housing supply is impacted by many factors. These include zoning and planning systems, which are urgently in need of reform across all jurisdictions, and the financial feasibility of new housing in terms of financing, labour, materials and government charges. State Governments are reforming planning systems, though many face opposition from vocal anti-housing groups who are resistant to new homes in their well-established neighbourhoods.

Our university members have also experienced significant barriers to building new student housing, due to restrictive state and local regulations. Most recently, UNSW had its plan for a 1066 room housing development opposed by Randwick Council after a year of negotiations¹⁰.

⁵ Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024, Explanatory Memorandum, pg 61.

⁶ International student numbers by country, by state and territory - Department of Education, Australian Government

⁷ International student numbers by country, by state and territory - Department of Education, Australian Government

⁸ The Student Accommodation Council, 'Myth busting international students' role in the rental crisis', April 2024

⁹ The Student Accommodation Council, 'Myth busting international students' role in the rental crisis', April 2024

¹⁰ The Guardian, 'Tough assignment: Australian universities are desperate for more student housing, but not everyone's on board', Lenore Taylor, 9 June 2024.

The BCA's position is that we must tear down the barriers to housing supply at a state and territory level, rather than impose impossible requirements on universities to solve the housing crisis. The universities do not have control over housing, so putting the responsibility on them, will only distract from achieving real outcomes.

Instead, the Federal Government should create a national reform fund that makes payments to states and territories to incentivise them to improve productivity through reform measures, including reforms that would unlock more homes.

Recommendation 2

The Government should cease linking international student numbers to the broader housing crisis, noting the mismatch with the annual cap cycle and housing approvals and construction lead times.

- Remove reference to housing provisions from the Bill amendments Explanatory Memorandum and the Framework.
- Create a national reform fund that makes payments to states and territories to incentivise them to improve productivity through reform measures, including reforms that would unlock more homes.

5. Limits on student enrolments

If the Government persists with a managed growth approach to the international student sector, the BCA recommends that a more effective and appropriate method is via mission-based compacts between individual universities and the Department of Education or the ATEC, as recommended in the Universities Accord¹¹.

The compacts could include equity and domestic attainment targets that suit each institution and the communities they serve. This would ensure international student numbers complement Australia's broader migration strategy, while implementing major higher education sector reforms as agreed by Government.

In setting caps, the Department should consider the broader implications for running complex organisations such as universities. As stated above, universities have experienced a long-term decline in Government investment, particularly in infrastructure and research, and have come to rely on full fee-paying international students' tuition fees to deliver their core functions. Australia spends just 1.68 per cent of GDP on research, compared to the OECD average of 2.24 per cent¹². The plummet in international student numbers (and corresponding fees) during COVID-19 left many universities in the red and some have yet to rebound¹³.

Given universities' reliance on international student fees in the absence of additional Government funds, the BCA recommends international student caps be considered within the context of the post-pandemic recovery and the university's current and projected financial position.

Recommendation 3

If the Government persists with a managed growth approach to the international student sector, set caps via mission-based compacts between individual universities and the Department of Education, as recommended in the Universities Accord.

- When setting international student caps, universities' financial position, employment profile, infrastructure costs and other obligations associated with running a complex organisation should be considered.

5.1 Consultation

The BCA is concerned that provisions in the Bill place enrolment limit decisions solely in the hands of the Education Minister, with no requirement for broader consultation or a review process. This risks politicisation and unintended consequences that may adversely impact the international education sector.

Part 7 and Part 8 of the Bill outline that there are two mechanisms by which the Minister may impose enrolment limits. An 'instrument', which is subject to the requirements in the Legislation Act 2003, and a 'notice' which is not subject to the Legislation Act. The Minister can vary an instrument at any time "if the Minister is satisfied that it is appropriate to do so".

If issuing an instrument, the Minister may consult with any other person, including TEQSA, the immigration minister and the registered education provider. There is no obligation to consult if a 'notice' is issued. Instead, the Minister must give a copy of his notice to TEQSA and the Department Secretary. A notice is exempt from merits review.

¹¹ Australian Universities Accord Final Report, December 2023, pg 203

¹² OECD Data – [Gross domestic spending on R&D](#)

¹³ Australian Universities Accord Final Report, December 2023, pg 141

The use of the word 'may' provides optionality. The BCA recommends it be changed to 'must' to create a compulsory obligation to consult with TEQSA and the immigration minister. This will ensure the nuances of higher education processes are considered within the context of the broader migration strategy. Further, the obligation to consult should be extended to notices issued under subsection 26C of the Bill, in addition to the imposition of total enrolment limits by legislative instrument.

Recommendation 4

The Bill mandate the Education Minister consult with TEQSA and the Minister for Home Affairs as a minimum when setting international caps and issuing notices.

- The Bill text should be updated from 'the Minister *may* consult' to 'the Minister *must* consult'.

5.2 Breach provisions

The BCA is opposed to the disproportionately harsh breach provisions in the Bill.

As per the Bill amendments, education providers that exceed their international student cap by even one student will receive automatic and immediate suspension of their CRICOS registration for all courses in all locations for the relevant year(s).

Our university members have explained how the imprecise process of student enrolment means a university would need to deliberately under-enrol international students in every course to avoid the risk of penalty. For instance, if a cap is set at the same level or lower than a university currently recruits, it would need to carefully manage the number of offers in the market, have stricter acceptance deadlines, and run offers in competitive rounds rather than on a rolling threshold basis.

With sometimes only 20 per cent of offers being accepted¹⁴, it is difficult to accurately calculate how offers will translate into enrolments. If demand is higher than expected, the university would have to rescind a student's offer in order to stay under the proscribed cap.

If a student wants to come to Australia, they will need to align their study plans and the financial costs involved, as well as accommodation logistics and family arrangements. Australia's reputation will be significantly damaged if universities are forced to rescind offers once students are already preparing to arrive. The highly sensitive international student market will quickly realise this major risk to applying for courses in Australia and students will simply choose another destination country.

Universities may also need to adjust entry standards to tighten enrolment procedures. As raising entry requirements would make it even harder for applicants from smaller, less represented source countries to gain entry, the breach provisions would also undermine the diversity objectives of the Framework.

Overall, the harsh breach provisions will alter university offer and enrolment processes, leading to severe consequences for student demand and potentially creating institutional reputational damage. Rebuilding interest for re-opened programs or a re-registered institution is costly and time consuming.

The BCA recommends the Government adjust the breach provisions in the Bill to ensure they are proportional and factor in provider administration processes. This could include a 5 per cent enrolment buffer before registration suspension, and a breach warning rather than immediate cancellation.

¹⁴ 'Universities plan to enrol 50,000 overseas students in first year of cap', The Australian, Riannon Down, 12 June 2024

Recommendation 5

The Bill allow a 5 per cent buffer before registration suspension to account for the inherent uncertainty in the student enrolment process.

- Rather than an immediate and automatic suspension of the CRICOS registration after a cap breach, facilitate a two-strike warning system for registration suspension.

5.3 Timing

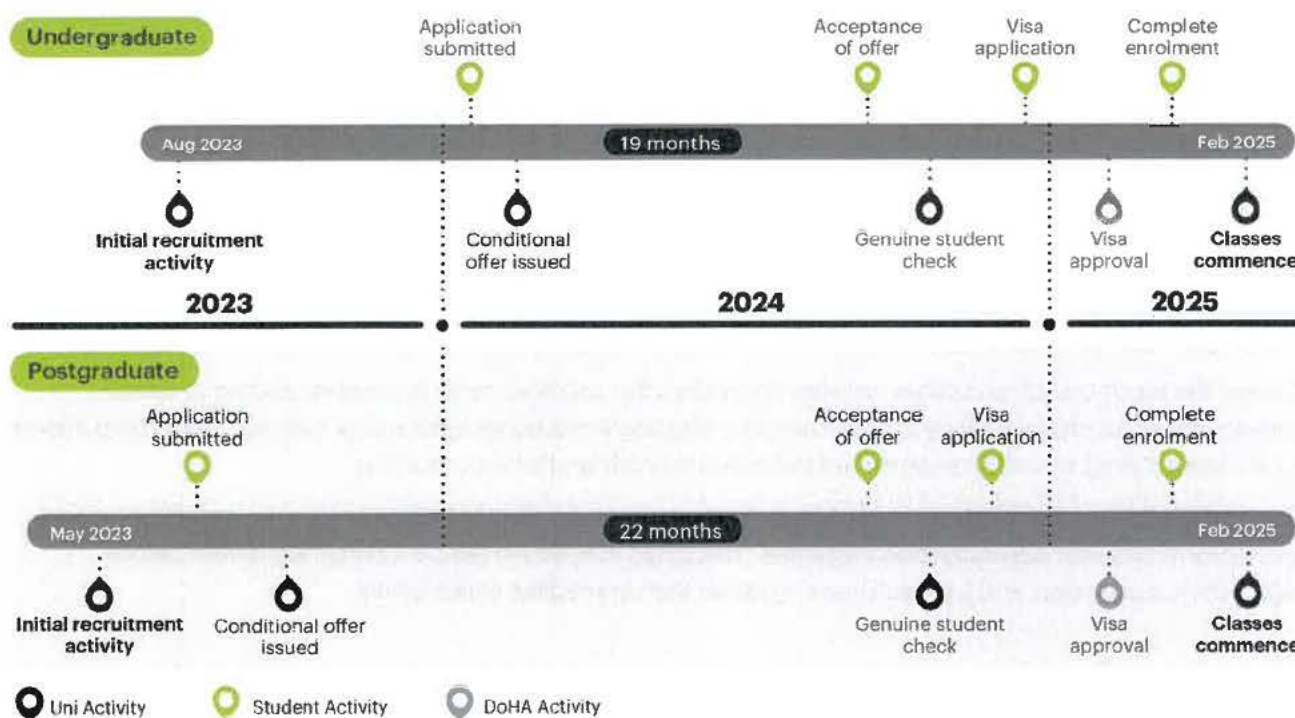
The BCA has deep concerns with the timing of the instruments in the Bill. This again demonstrates policy that has been developed in the absence of consideration for the practical operations of the sector.

The Bill stipulates that for 2026 onwards, an instrument must be made before 1 September of the year before the first year to which the instrument applies. For 2025, the transitional provisions enable the Minister to issue the instrument at any time before 31 December 2024.

The timing of the enrolment limits does not align with offer and enrolment processes for universities and will lead to every university being in breach of a cap (if it is lower than their current enrolment) in 2025. International student enrolment takes over 18 months from the point of offer to acceptance. International admissions operate on a rolling basis and offers are usually made one to two years in advance.

If an initial cap was applied in December 2024, the higher education sector would therefore require all of 2025 to implement the changes, with cap adherence occurring in 2026. Going forward, the Government would need to deliver cap provisions in the June/July of each year, for implementation in January/February 18 months later.

Figure 3: Indicative timeline for 2024 international student commencement



The BCA recommends the Government adjust the timings referenced in the Bill to align with education sector enrolment processes.

Considering the economic impact of reducing international student numbers (as outlined in Chapter 3), we also recommend implementing a sunset clause for enrolment limit provisions in the Act to reassess the managed growth requirement based on broader education and migration settings. The sunset clause could be based on the establishment of the ATEC or for a period of three years.

Recommendation 6

Update the timings referenced in the Bill to align with education sector enrolment processes.

- Interim arrangements should include an 18-month implementation phase (from 31 December 2024 – June 2026)
- Cap requirements be handed down in June of each year, for implementation by January/February 18 months later.

Recommendation 7

The international student enrolment limit provision of the Act be reviewed under a sunset clause of 3 years or the establishment of ATEC.

5.4 Integrity

The BCA is highly supportive of the elements in the Framework and the Bill that improve the integrity of the international education sector. It is essential that Government regulates to stop dishonest education providers from exploiting our visa system. We should focus on market development and recruitment of high-quality students and take action to remove access for non-genuine students, especially where this is occurring through some poor-quality offerings in the VET market.

We recommend the Government focus integrity reforms on providers that have not demonstrated their long-term viability and quality. Universities and TAFEs, which already adhere to extensive Government legislation and regulations, should not be subject to additional integrity measures. By excluding universities and TAFE from additional integrity measures in the Bill, regulators can focus on unscrupulous agents, disreputable providers and non-genuine students.

Recommendation 8

The Government should exclude the highly regulated university and TAFE sectors from additional integrity measures in the Bill and instead focus on education providers that have not demonstrated their long-term viability and quality.

6. International students and skills gaps

Australia is facing some of the worst skill shortages in our history. New sectors such as the net zero transition, defence including AUKUS, construction and manufacturing, and the growing need for care and digital skills have led to labour pressures throughout the economy.

The Framework suggests that international student enrolments should better align with Australia's skills needs. This is supported by the provisions in the Bill for the Minister to set enrolment limits at the course level, in an attempt to herd students into courses that would fill skills gaps.

International students play a small role in filling some skills gaps, particularly in STEM and cyber where we do not have enough graduating Australian students. However, the vast majority of international students return home after studying. Restricting their course choices may be effective in some core areas, but overall, it will have a minimal impact on the Australian labour market.

To put it in context, only around 24 per cent of international students use their post-study work rights¹⁵, and just 16 per cent become permanent residents¹⁶. That is why the Migration Review examined how we could lift the number of skilled students staying Australia to fill short term employment needs.

We are supportive of finding new ways to encourage highly skilled international students to enter the Australian job market and become permanent residents. This includes providing international students with access to work integrated learning to prepare them for the Australian workforce.

However, we suggest that the migration policy is a far more effective mechanism for addressing immediate skills gaps than setting course quotas via the ESOS Bill.

The BCA recommends removing the provisions to set international student caps at the course level. Attempting to force students into skills gap areas rather than their course of choice will only lead to dissatisfied international students and persistent skills gaps.

Recommendation 9

The Government should remove ministerial powers to set enrolment limits at the course level.

- It should use its Migration Strategy as the key driver for addressing short term skills gaps and the ability of international students to meet those needs.

¹⁵ [Review of the Migration System \(homeaffairs.gov.au\)](https://www.homeaffairs.gov.au/migration-reviews/review-of-the-migration-system) page 110

¹⁶ [Pathways to permanency | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/pathways-to-permanency)

BUSINESS COUNCIL OF AUSTRALIA

GPO Box 1472, Melbourne 3001 T 03 8664 2664 F 03 8664 2666 www.bca.com.au

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