

I have been involved in Australian migration consulting since 1984 first out of Asia, based in my home town of Brisbane and since 1998 here in Johannesburg South Africa.

Given my long experience here in South Africa I am largely coming at this from the perspective of South African business people looking to leave this country for a whole variety of reasons and so I begin my submission with my overall view of the current situation in this country.

This is a beautiful country from both a physical point of view and through its cultural diversity.

However its beset with a whole range of challenges, socially and economically with the latter having an increasing flow on effect to the former.

Despite there now being a President, Cyril Ramaphosa, with vision for the future there is a growing feeling that increasing levels of unemployment, economic stagnation, social unrest and corruption is driving South Africa to a possible point of no return, at least in the short to medium term. Despite my love of this country it is a feeling that I share. I always say that ' I can see why South Africans of all races find it difficult to contemplate leaving these shores, but I also understand why an increasing number are doing so'.

For some time now I have been concerned about the impact that the brain drain is having on the South African economy and given the work that I do here I know better than most the range of skills , including business skills, that are leaving and for those moving to Australia the benefits that most are making to our Australian way of life.

As far as business migration from South Africa is concerned, I personally have a great deal of knowledge as to the entrepreneurial skills and drive that South Africans have brought to all the various States/Territories across Australia and so it disappoints me to see the relatively low number of visa places allocated to BIIP at 6,862 for this migration program year.

Whilst many years ago South Africans tended to go more to WA there has been a shift in the past few years towards Qld and so it also disappoints me to see that in the last migration program year and again in this year that State has utilized its allocated BIIP nomination places by February whilst as it stands now other States/Territories still have places available. This is very frustrating for South African business people who for family and business reasons wish to move to Qld and sooner rather than later given the current situation in South Africa.

Before moving on to the specific questions set out in the consultation paper and, related to what I mentioned in the paragraph above ,another major concern is the lengthy processing times for the BIIP visa applications both at the initial sub class 188 visa application stage and later the sub class 888 stage and of course also for the 132 visas.

I met with one of my SIV clients yesterday who was particularly disgruntled with this aspect of the visa processing procedure since as he stated he has invested A \$ 5m into Australia after having to wait nearly 15 months for him to gain the initial temporary visa and will, currently, now have to wait a further 12 months before finally being able to gain PR status.

I wonder why this is the case given the relatively low number of BIIP visa applications submitted each migration program year.

Now onto those questions.

### **Minimum Investment Amounts for Investor Visas**

I sense from the tone of this topic that there is every possibility that the investment amounts for both the SIV and 188 B will be increased.

Once again from the perspective of the South African emigration market I believe that any increase in the SIV investment requirements will have a dampening effect on demand from what I guess is already a low base compared to say China .

As far as the 188 B is concerned and whilst I can in some ways understand the push to increase the investment amount this would certainly, in my view, substantially decrease the demand from this part of the world particularly given what is expected to be increasing downward pressure on the Rand going forward.

### **Investment Composition of Investor Visas**

I have no comment on the makeup of the SIV investment composition but would like to see that the 188 B investment composition move away from being wholly State/Territory bonds into other potentially more lucrative investment vehicles from both the point of view of Australia and the visa holder.

### **Streamlining the BIIP Visa Program**

I am all for simplifying the BIIP framework to make it more efficient and attractive to potential applicants given the plethora of visa options and procedures but this is not so much an issue here in South Africa with English being the predominant mode of communication but once again I highlight the issue of the lengthy processing time for BIIP visa applications and its impact here in South Africa.

As far as the sub class 132 Business Talent visa is concerned this is, of course, particularly attractive to many South African business people given its direct link to PR. Once again from my own experience South Africans are highly motivated to make a go of it in Australia and there are many many examples of the contribution that they have made to the Australian business environment.

### **Encouraging Higher Levels of Investment and More Investment and Business Innovation Activity in Regional Australia**

This push to attracting a greater flow of BIIP business and investment activity to the regions is of course to the medium and long term benefit to Australia though as with this push for skilled migrants what comes first – the move to the regions or the opportunities in those regions for employment/ business and investment opportunities .

From afar I can see that young Australians themselves are looking to get out of the major capitals into the generally far less expensive and not so congested regions of Australia and so it looks to me that this drive is already underway which in turn would make it more attractive for business people to make the move to service the growing populations in the regions .

In the short turn and from a business perspective I believe that business migrants would generally only look at moving to a region where there are existing business opportunities even if the points test was restructured to provide incentives to make the move to a region.

South Africans are leaving a lot behind, at least in a materialistic and existing business investment sense, and not taking into account remaining family members, when they make the decision to move and so they are driven to ensure that they make up for this when they arrive in Australia. As far as business migrants are concerned, they will generally be very careful as to where they make their business investment and many have had their fingers burnt assuming that the business environment in Australia is the same as here in South Africa.

However I would still support some adjustment in the points test to encourage business investment in the regions. I would also like to see some of the existing visa places for regional skilled migration being allocated to business migrants and thereby increasing the total number of BIIP visa issued per migration program year.

As far as the other elements of the existing points test is concerned and once again from a South African perspective I would like to see business migrants older than 44 years given some points and bearing in mind that many business people over 55 years of age are almost still in their prime as far as their business experience/expertise and drive is concerned.

I can understand the push to increase the financial aspects of the points test including financial assets, business turnover and proposed business investment amounts but once again from a South African perspective and taking a longer term view there is no doubt that the Rand will depreciate against the Australian dollar. Also, given the close ties and many similarities between South Africans and Australians, South African business people bring with them other attributes over and above those that can be measured from a financial point of view.

One final point that I would like to make and its just not to do with BIIP is that I would like to see that dependency is determined at time of application and not at time of decision.

I am open to further discuss any matters relating to business migration from South Africa.