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**SUBMISSION TO THE MINISTRY OF BUSINESS, INNOVATION AND EMPLOYMENT ON
A PROPOSED TRADES AND TECHNICIAN PATHWAY**

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Thank you for the opportunity to submit on the new Trades and Technician Pathway for migrant workers.

1. About CCNZ and its members

CCNZ members carry out most of the country's civil infrastructure construction and maintenance work, performing the physical construction of the country's transport, water and other civil infrastructure networks. We estimate the civil construction sector carries out more than \$12 billion of work annually and employs more than 60,000 workers. Typical employees range from labourers to tradespeople to engineers and senior managers.

We represent more than 500 contracting businesses, ranging from large civil construction and infrastructure companies employing thousands of staff to very small contractors and family businesses. We also represent more than 270 businesses that provide equipment and services to support civil construction, including recruitment. The principal clients our members work for are central and local government agencies, local authorities, and clients in the private sector, with some residential development.

Civil contractors construct and maintain the infrastructure that is built before other development can happen – including earthworks, transport and water construction and soil stabilisation.

Due to a lack of visible domestic pathways from education into work in infrastructure construction, the civil construction industry faces a significant shortage of workers and skills. Our industry often suffers from critical skills shortages.

We currently have a visa issue that is going to bite hard in the next 6-12 months if not sorted out with immigration. This impacts water pipeline construction and maintenance workers that need a pathway to residency, or we will start losing a lot of workers that are trained in and acclimatized to NZ work conditions in infrastructure construction and maintenance. Faced

with this and a lack of domestic skilled domestic recruits we will suffer shortages that will impact on timelines for project completion.

2. Introduction and executive summary

We welcome the opportunity to provide feedback through this consultation, however the very short consultation timeframe of four working days has not enabled us to fully engage with members. Given the importance of the consultation, and the relative complexity of the proposals, we do not believe the consultation time allowed to be sufficient.

The civil construction industry's trade registration, [Civil Trades](#), is set up to recognise current competency for civil infrastructure construction, including road construction and maintenance, water pipeline construction and maintenance, installation, forestry roading and other strands. It is the appropriate professional registration for master craftspeople working in the civil trades, and is supported by qualifications on the New Zealand Qualifications Framework; examples are the New Zealand Certificate in Pipeline Construction and Maintenance, or the New Zealand Certificate in Infrastructure Works.

We consider significantly more effort is needed from Immigration New Zealand to recognise, understand and support apprenticeships and professional registrations. Without this, it will prevent us from employing the hands-on people we need to construct and maintain NZ's infrastructure networks, who are not currently being developed through the NZ education system.

We also need Immigration NZ to support the creation of relevant descriptors for roles in the industry not currently supported through ANZSCO. The system also needs to recognise the value of experience gained internationally where there is no associated qualification.

Executive Summary

- **Overall, we consider the proposed pathway will not be workable for civil trades technicians working in the industry as it stands.**
- **The definition provided does not include infrastructure construction trades, and should be amended to do so.**
- **The industry has established career and qualification pathways for NZQA Levels 2-6 under the NZ Certificate in Infrastructure Works and Civil Trades**
- **A key issue is the lack of a suitable occupation code within the ANZSCO/National Occupation List (NOL) to cover skilled Civil Trades work. Having a 'Civil Trades Technician' role added to the NOL at Level 3 will be a critical step.**
- **It is difficult to look at a standalone trades and technician list without the bigger picture around what is on other lists. We have hesitated to provide a list of roles, in case this has unforeseen consequences or results in removal of roles from other lists, causing flow-on employment issues for members.**

- The qualification requirement of Level 4 (with additional 120 credits) does not match industry employment practice at this level.
- The requirement of ‘at least 4 years of post-qualification skilled work experience, with at least 1.5 years of skilled experience in New Zealand paid at least the medium wage’ renders this pathway unworkable. This length of stay does not match the settings under the Accredited Employer Work Visa
- A qualification at level 4 or higher is required in the proposal, but this isn't usual for trade roles in infrastructure. Often, operators are skilled and experienced, but do not enter the country with qualifications, so an option for an experience-based criteria needs to be added (e.g. 4-6 years experience)
- Include more infrastructure specific roles e.g. steel fixers, formwork carpenters, infrastructure pipe layers (note: separate from drain layers who can only work inside the residential boundary), heavy plant operators
- CCNZ supports the further summary points and recommendations provided in the Business New Zealand submission

3. Definition

The definition provided does not encompass civil infrastructure in the water or transport construction trades at all, so we do not believe it to be fit for purpose. We propose the definition be amended to include:

“Technicians and trades workers perform a variety of skilled tasks, applying broad or in-depth technical, trade or industry specific knowledge, in support of a wide variety of sectors and specialisations that include:

*• health; science; engineering; ICT; manufacturing (including textiles, metal, wood, glass, chemical, electrical and electronic); construction (including housing, furniture, and fittings); **infrastructure, including earthworks and site preparation, piling, road construction and maintenance, and water networks construction and maintenance**; transport (including motor vehicles, bicycles, air and marine craft); printing; animal care and veterinary assistance; plant propagation, cultivation, and horticulture; sports; power generation operation and equipment; and creative and artistic exhibitions and performances (including television, film and media). “*

4. List of ‘eligible’ roles

Very few infrastructure trades occupations are included on the list provided. While there are some related roles included, for example ‘Crane, Hoist or Lift operator’, or ‘welder’, none of the roles featured relate to earthmoving, road construction (such as paving, surfacing or roadmarking), or pipeline construction and maintenance.

5. Use of NZQA Level 4, 120 credit qualifications

The civil construction industry has a suite of qualifications to service civil trades workers involved in fields such as transport, water construction. All of these NZ Certificates are well

recognised and supported by industry and have well respected providers such as Connexis through the Civil Infrastructure pathways.

6. Use of ANZSCO

Roles from the NZ Certificate in Infrastructure Works suite of qualifications are not well described in ANZSCO – and may appear as a variety of roles across ANZSCO skill levels 3, 4 and 5, for example:

731199 Mobile Plant Operators nec	Operates other mobile plant equipment	4
721214 Excavator Operator	Operates excavators	4
721212 Backhoe Operator	Operates backhoes	4

These are simply pieces of equipment used to complete a task, and not descriptive of the role or the skill level.

7. Migrants currently in NZ

We also need to work out how we can keep current migrants who a) are on work visas but risk being let go from current businesses due to lack of work and want to stay in NZ to fill available roles and b) who have relevant skills to fill roles applicable to job tokens to be issued.

Many are towards the end of their three-year visa and can't get visa extensions or residency as the pathway does not exist for them. There is a fair bit of fudging required to get them to stay in addition to significant cost.

Currently it's easier to bring in a new worker from overseas than take on an existing visa holder as there is a two-step process to getting a current visa holder on board: 1) variation of visa to get them across to new business from current employer and b) application for new visa under new role category.

8. Conclusion

Thank you for the opportunity to make this submission. We cannot stress enough the urgency with which the immigration challenges need to be addressed; this cannot wait until mid-2026. For these changes to be workable, we need enough time to engage with our members to ensure they are fit for purpose. We consider closer industry engagement is essential. We welcome the opportunity to support Immigration NZ in ensuring these critical pathways are functional. Urgent and genuine engagement is needed on this important issue for our sector.

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