

Civil Contractors New Zealand submission

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Date: 7th July 2026

About Civil Contractors New Zealand

Founded in 1944, Civil Contractors New Zealand is an industry association representing the interests and aspirations of more than 827 member organisations, including 505 large, medium-sized, and small businesses in civil engineering, construction, and general contracting. Our 327 associate members provide valuable products, support, and services to contractor members. We live and work in all communities across New Zealand.

Our members play a vital role in the development of our country, our economy and our way of life. They are responsible for the construction and maintenance the roads connecting our cities and towns; they install and care for the water networks that bring fresh water to houses and wastewater to treatment plants; they install the cables that bring the internet to homes and businesses. These are services a modern and developed economy must have to compete efficiently in world markets and to deliver high living standards for all New Zealanders.

The broad civil construction industry employs more than 60,000 people and undertakes projects worth around \$10b to \$12b annually. More specifically, our organisation represents the contractors who carry out the physical construction works on New Zealand's roading, rail, port, public transport and utilities networks.

Thank you for the opportunity to provide feedback and for our recent meeting. During the meeting we discussed looking at the other roles for their relevance to the civil construction sector. With national projects about to kick off, and an already reduced pool of skilled and specialist operators in the country, CCNZ needs to be assured that the changes in this proposal do not lead to a reduction in skilled staff at a time when they are needed and not able to be readily sourced from the domestic workforce.

Proposal 1: Removing duplication between the Green List and Trades and Technician pathway

Of the 13 occupations proposed for removal from the Green List Work to Residence (WTR) pathway under Proposal 1, the following are of direct relevance to the civil construction sector:

- Building Associate (Building Construction Supervisor) (312112)
- Metal Fabricator (322311)
- Welder (322313)
- Fitter (General) (323211)
- Fitter and Turner (323212)
- Fitter-Welder (323213)
- Metal Machinist (First Class) (323214)

What impact do you think removing these 13 occupations from the Green List Work to Residence pathway will have on employers, migrants, and your sector?

CCNZ considers the proposal will result in a longer overall pathway, despite the shorted New Zealand based component.

The Trades and Technician pathway requires 4 years of post-qualification experience overall, including 18 months in New Zealand, compared to 2 years of New Zealand-based experience under the Green List WTR pathway. While the New Zealand-based experience requirement is shorter, the overall time to residence is longer. For trades that support civil construction plant, equipment, and supervisory continuity, this extends the period of uncertainty for both the worker and the employer before residence is secured.

Loss of Labour Market Test exemption is inconsistent with the original shortage rationale

Occupations were added to the Green List because they were assessed as skilled, hard-to-fill, and nationally important. Removing the Labour Market Test exemption for Building Associate and the metal trades cluster (Fabricator, Welder, Fitters, Metal Machinist) reinstates a requirement that the original Green List assessment was designed to remove.

Employers recruiting into these already hard-to-fill roles would face added cost and delay without clear evidence the underlying shortage has eased.

Supervisory continuity risk — Building Associate

Building Associate (Building Construction Supervisor) is a safety- and compliance-critical supervisory role on civil construction sites. Reducing the maximum continuous stay from 5 years to the standard 3 years increases the frequency of visa renewal for a role where continuity of supervision matters for quality and health and safety outcomes on longer-running projects. Additionally, as the New Zealand domestic workforce grows to keep up with projects, overseas supervisory roles play an important role in growing sector capability.

A qualification threshold gap for part of the current workforce

The Green List WTR pathway currently accepts a specified qualification between Level 3 and Level 4, while the Trades and Technician pathway requires a relevant qualification of at least Level 4. Workers who hold a Level 3 qualification and would currently be eligible under the Green List may not meet the higher bar under the new pathway. We ask MBIE to

consider whether this creates a coverage gap for a subset of otherwise experienced tradespeople in the metal trades cluster.

Lower wage threshold may not offset the above

The Trades and Technician pathway requires the median wage for 18 months, compared to 1.15–1.5 times the median wage for 2 years under the Green List. While this lowers the wage bar, we do not consider this offsets the combined effect of a longer overall pathway, loss of Labour Market Test exemption, and reduced maximum stay for these occupations.

As discussed during our meeting this could also be confusing for contractors looking to employ overseas experienced staff.

Proposal 2: Removing duplication between the Green List and Skilled Work Experience pathway

Of the four occupations proposed for removal under Proposal 2, three are of direct relevance to the civil construction sector:

- Paving Plant Operator (721913)
- Crane, Hoist or Lifter Operator (712111)
- Pressure Welder (322312)

What impact do you think removing these four occupations from the Green List Work to Residence pathway will have on employers, migrants, or your sector?

CCNZ considers this could result in a longer and less certain pathway to residence for already hard-to-fill trades.

The Skilled Work Experience (SWE) pathway requires 5 years of directly relevant experience overall, including 2 years in New Zealand, compared to 2 years of New Zealand experience under the Green List WTR pathway. For occupations the sector already struggles to fill domestically, this makes New Zealand comparatively less attractive to experienced operators and welders who have options elsewhere.

Loss of AEWV settings that currently support recruitment

Moving off the Green List removes Labour Market Test exemption and priority processing for Job Check and AEWV applications and reduces the maximum continuous stay from 5 years to 3 years. This adds cost, delay, and renewal frequency at a time when civil infrastructure delivery programmes are under time pressure. This reduction in time is a real issue for contractors when they may lose key staff at critical points in infrastructure projects. This is disruptive and impacts the overall project.

Removing the qualification requirement raises concerns

The SWE pathway removes the qualification requirement in favour of a 5-year experience requirement. For Paving Plant Operator and Crane, Hoist or Lifter Operator, this may make eligibility harder to evidence in practice, since career progression in these trades is often built on the job under varying job titles rather than a single clear qualification record.

For Pressure Welder specifically, formal qualification and certification is closely tied to the safety-critical nature of pressure vessel and pipeline welding. Replacing a qualification-based check with a purely experience-based one removes a formal competency checkpoint for a role where technical error carries significant safety consequences. We ask MBIE to consider whether an experience-only pathway is appropriate for this occupation.

Inconsistent treatment relative to closely related trades under Proposal 1

Welder, Fitter, and Metal Fabricator (Proposal 1) would retain a Level 4 qualification requirement under the Trades and Technician pathway, while Pressure Welder, Paving Plant Operator, and Crane Operator (Proposal 2) would move to a no-qualification pathway. Civil contractors frequently recruit across several of these trades from the same overseas labour markets; applying two different pathway logics to closely related occupations add complexity for employers navigating recruitment decisions.

Family accompaniment settings should be clarified

The Green List settings explicitly support partner and dependent visas. It is not clear from the consultation document whether the SWE pathway carries equivalent settings. We ask MBIE to clarify this directly, as it may materially affect whether experienced workers with families choose New Zealand over competing destinations.

Are there other occupations you consider should be removed from the Green List Work to Residence pathway?

CCNZ does not propose additional occupations for removal from the Green List WTR pathway at this time. We would welcome the opportunity to engage further as part of Phase Two, when the longer-term role and purpose of the Green List — including its interaction with broader SMC settings — is considered in more detail.

Proposal 3: Merging Care and Transport Sector Agreements into the Green List WTR pathway

CCNZ has no direct comment on Proposal 3. The occupations affected (Care Sector Agreement and Transport Sector Agreement roles) fall outside the civil construction sector and are not represented among CCNZ's membership.

Proposal 4: Technical and administrative changes

Are there any Green List occupation-specific requirements that are wrong, or do not reflect industry practice?

CCNZ would welcome the opportunity to work with MBIE to review occupation-specific requirements (such as registration and qualification references) for the civil construction trades identified in this submission, to ensure they reflect current industry practice and qualification structures. We are happy to provide further detail on specific requirements separately if that would assist.

Recommendation

CCNZ recommends that MBIE:

Reconsider the proposed removal of Building Associate and the metal trades cluster (Metal Fabricator, Welder, Fitter, Fitter and Turner, Fitter-Welder, Metal Machinist) from the Green

List WTR pathway under Proposal 1 or provide transitional settings for Level 3-qualified workers who would not meet the Trades and Technician pathway's Level 4 threshold.

- Reconsider the proposed removal of Paving Plant Operator, Crane, Hoist or Lifter Operator, and Pressure Welder from the Green List WTR pathway under Proposal 2, particularly given the safety-critical nature of Pressure Welder and the verification challenges of an experience-only pathway for all three occupations.
- Raise and maintain the maximum continuous stay for AEWV applications / setting to 5 years.
- Clarify whether partner and dependent visa support under the Skilled Work Experience pathway is equivalent to current Green List settings.
- Engage directly with CCNZ on occupation-specific requirements under Proposal 4 that may not reflect current industry qualification practice.

Yours faithfully



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Principal Business Partner