

Civil Contractors New Zealand submission to TEC regarding the Infrastructure Sector Code Coverage

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About Civil Contractors New Zealand

Founded in 1944, Civil Contractors New Zealand is an industry association representing the interests and aspirations of more than 832 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, and public transport and utilities networks.

CCNZ welcomes the opportunity to comment on the draft Orders in Council establishing Industry Skills Boards.

Summary

Despite the incredibly short time frame of one week to submit on these draft Orders in Council we have reviewed the proposals and make the following key points and recommendations.

Section 1 – Name and coverage of the board

Our comments here relate to our previous submissions around industry coverage.

Overall, we support the proposed industry coverage under the ANZSIC codes. However we still have concerns that there are sectors that would be better covered in the Energy and Infrastructure Industry Skills Board, as they relate specifically to the construction and maintenance of horizontal infrastructure. We request the following changes:

- Water is a key part of infrastructure, and directional drilling is a key part of water construction, as horizontal directional drilling is how water pipes are installed.

In our submission, we requested category E329900 be added, particularly as regarding horizontal directional drilling, road marking and lane marking. This is an important part of water infrastructure pipeline construction and maintenance, as well as cabling for energy. This is demonstrably part of construction and maintenance for water infrastructure.

- **Recommendation 1:** include directional drilling in Energy and Infrastructure ISB
- Paving is also a key consideration. For example, the laying of road pavements, but also the paving of public spaces and retaining walls etc. Retaining and piling is also a key factor in bridge and road construction, so the codes from E322200 should note crossover with infrastructure.
 - **Recommendation 2:** include paving in Energy and Infrastructure ISB

Section 2 – Planning and Reporting

(4) Statement of strategic direction

We consider that industry is missing from the development of the strategic direction of Infrastructure Skills Boards, as set out in part 4 of the [proposed Orders in Council](#).

Industry, or relevant industry, including industry associations is not expressly listed as required to be consulted with. Strong industry leadership will be required to ensure the success of ISB and industry involvement in setting the strategic directions of the boards must occur. Currently there is no requirement for industry involvement at this key stage.

We recommend that in addition to consulting with the Minister; secretary of Education; vocational education providers; persons or bodies representing secondary schools and any other persons or bodies the Board thinks fit an additional point is included that expressly states: “relevant industry associations, as they relate to the Industry Skills Board coverage”.

Additionally, there is a lack of detail around “vocational education providers.” This needs to be clarified as to which vocational education providers should be consulted with. For example is it all polytechnics, all private training entities, or just who the ISB deems relevant.

Equally, clarity is needed around who the persons or bodies representing secondary schools is meant to be. Is this unions, associations, principals, heads of department, networks within the ministry of education, professional bodies or something else?

- **Recommendation 3:** add a requirement to consult with relevant industry associations, as they relate to the Industry Skills Board coverage to section 4 of the proposed Order in Council
- **Recommendation 4:** add a requirement to consult with relevant industry associations, as they relate to the Industry Skills Board coverage to section 4 of the proposed Order in Council

Section 3 – Industry engagement and collaboration with other industry skills boards

6. Specified industry advisory groups

We strongly support the establishment of industry advisory groups, as proposed in section 6.

7. Engagement with specified industries

We support the development of an engagement model, as proposed in section 7. The previous model implemented through the Workforce Development Councils, which featured strategic reference groups made up of industry experts, worked well. We would like to see this model and methods of engagement re-instated in the ISB.

In terms of reporting, we would like to see a wording change that regular reporting to the specified industry on “*any steps taken*” be amended to include “*any and all steps taken.*”

- **Recommendation 5:** change the wording in the third bullet point around regular reporting to the specified industry on “*any steps taken*” be amended to include “*any and all steps taken.*”

8. Engagement with industry bodies

We support the engagement noted. We recommend the inclusion of the following bullet point that strengthens the relationship between industry and the ISB.

- To understand and give effect to investment in qualifications development, quality assurance and other engagement as necessary to support industry workforce development

9. Employer and employee advisory committees

Largely we support the establishment of opportunities for engagement. However, the ISB will be engaging with a range of stakeholders that can represent this voice.

The statement that the Board must consult with bodies representing employers and employees has the potential to require ISB’s to consult with unions. We do not see this is

necessary and a potential diversion to the overall purpose of the ISB, which is standard setting and quality assurance as opposed to terms of employment. The appropriate consideration is learning requirements.

We do not support the mandating of these committees in the OIC and recommend they remain “as the case may require.” This clause could lead to over consultation and a lack of progress in the vocational education sector.

- **Recommendation 6:** remove mandatory employer/employee advisory committees as this should already be covered elsewhere. Creating specific employer/employee distinctions may add complexity without adding value.

10. Collaboration with other industry skills boards

We support collaboration with other ISBs, where this is required. Civil construction has identified a number of ANZSIC codes where there is cross sector coverage. It will be important for industries and standard setting to work collectively for good education outcomes.

13. Restriction on Board’s use of assets for training activities

We largely support these restrictions, however industries have invested heavily in these assets, so there should be a requirement to consult with industries, as well as TEC, in order to ‘sell, gift or otherwise dispose of the assets’.

- **Recommendation 7:** Add a requirement to consult with industry, i.e. “must not sell, gift, or otherwise dispose of the assets, except in accordance with a transition plan approved under clause 156 of Schedule 1 of the Act, or otherwise with the TEC’s written consent and agreement from the relevant industry;”

Conclusion

Thank you for this opportunity to provide feedback. We are happy to discuss any points we have raised.

Yours faithfully



Alan Pollard
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Civil Contractors New Zealand

