

Civil Contractors New Zealand submission on the redesign of the vocational education and training system

To: Ministry of Education

Contact: **Alan Pollard**
Chief Executive Officer
Civil Contractors New Zealand
PO Box 12013
Wellington

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1. About Civil Contractors New Zealand

- 1.1. Founded in 1944, Civil Contractors New Zealand is an industry association representing the interests and aspirations of more than 840 member organisations, including more than 500 large, medium-sized, and small businesses in civil engineering, construction, and general contracting. Our 330 associate members provide valuable products, support, and services to contractor members. We live and work in all communities across New Zealand.
- 1.2. Our members play a vital role in the development of our country, our economy, and our way of life. They physically construct and maintain 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.
- 1.3. The broad civil construction industry employs more than 60,000 people and undertakes infrastructure construction and maintenance projects worth more than \$12b annually. More specifically, our organisation represents the contractors who carry out the physical construction works on country's roading, rail, port, and public transport networks.
- 1.4. Vocational education and training is critical for the civil construction industry, yet the bulk of our workforce training is delivered on the job, and there are few pathways for new workers to develop vocational civil trade skills in a way that connects with industry at present.

- 1.5. In our annual [Construction Industry Survey](#) members have in recent years noted a shortage of skilled workers entering the industry as the biggest challenge the industry faces. Accordingly, the civil construction industry has worked hard to map out and understand its needs, as presented in the [Developing a Skilled Civil Construction Workforce report](#) (2022).
- 1.6. CCNZ thanks the Ministry of Education for the opportunity to submit on the reform of the vocational education system.

Executive Summary

2.

- We are neutral about the establishment of regional ITPs.
- We do not support a federation model that funds poorly performing ITPs in the manner proposed.
- We do not support the disestablishment of the functions currently performed by Waihangā Ara Rau Construction and Infrastructure Workforce Development Council.
- If we are faced with a fait accompli re the disestablishment of Waihangā Ara Rau, we would choose a modified option B, that retains the ability for industry to provide programme funding advice to the Tertiary Education Commission.
- We support the separation of standard setting from delivery to avoid the conflicts of interest that can arise, and foster innovation in delivery.
- We support our business unit, Connexis, becoming a standalone PTE or industry-governed training entity.
- We do not support a moratorium on new training providers.
- We do not support a reallocation of funding from work-based training to provider-based training.
- We believe the preservation of a direct line from industry to TEC / government (a role currently filled by Waihangā Ara Rau) is vitally important.

3. Consultation document

- 3.1. The consultation document, [Redesign of the Vocational Education and Training System](#), is not sufficiently detailed, and does not provide the information we would expect to receive to properly evaluate options.
- 3.2. In order to make an informed decision, an appropriate risk and benefit analysis for each option would be expected, along with a detailed financial analysis of the pre-2020, current and proposed structures. A good starting point would be a clear description of what outcomes for learners the redesign was intended to achieve.
- 3.3. The consultation document provides no clear vision of the problem to be solved, or the reason for reform, although frequent reference to cost and financial viability with few references to learner outcomes suggests cost is the primary driver.

- 3.4. If cost is the sole driver, this redesign should stop now, as the vocational education sector is fatigued from previous reforms, and continued years of reform will be disruptive for learners and those responsible for education delivery alike.

4. Structural Context

- 4.1. Although not perfect, the Review of Vocational Education (RoVE) started by the previous Labour government has delivered positive outcomes for the civil construction industry, including funded apprenticeships and better recognition of industry needs.
- 4.2. Our Workforce Development Council, Waihanga Ara Rau, finally gave our industry a structured point of contact with standard setting, qualification development, and connection into education funding that was missing pre-reform.
- 4.3. A Strategic Reference Group, comprising industry, training delivery, and Waihanga Ara Rau, chaired by industry, was established and collectively agreed a civil construction strategy that all bought into. That group continues to perform well.
- 4.4. Connexis was set up as a separate division of Te Pukenga. Therefore, it has largely operated autonomously from (and more successfully than) Te Pukenga.

5. Economic context

- 5.1. Currently, a shortage of work is threatening the civil construction sector. Members are restructuring and downsizing, removing business cost as a strategy for survival.

However, the Government has expressed large-scale infrastructure development plans, and New Zealand's recovery from economic recession will be construction and infrastructure led, with a massive programme of investment likely to hit the market in 12 to 18 months' time.

- 5.2. After a period of continued change that has been largely ideologically driven on both sides, we are concerned yet more proposed changes will undo important progress made in aligning training with employers' needs and set our sector back at a time when a shortage of skilled workers will threaten that construction-led economic recovery.
- 5.3. In the latest Construction Industry Survey, the three most highly sought skill sets were 'Machine Operator (plate compactor, excavator, roller, etc)', 'Supervisor/Team Leader', and 'Experienced Field Worker (i.e. traffic control, site safety, some industry experience)'.

Despite the market downturn, the industry still has demand for these skillsets, which are largely not developed through the formal education system and instead rely on work-based learning.

6. Training context

- 6.1. CCNZ believes vocational training is much more than what is delivered by industry training providers – by far the greater volume is delivered on-job.
- 6.2. There is also a difference between trade skills and academic skillsets. At present, while engineering skills are recognised and fostered through the degree and diploma pathway, these qualifications are becoming increasingly distant from hands-on work, and there is little recognition of civil construction trade skills through the education or immigration pathways.
- 6.3. Most employers have little direct contact with polytechnics for qualifications. Most employees entering as civil engineers or surveyors would hold tertiary qualifications such as degrees or diplomas before entering these roles in the industry, with some supported through employer cadetship programmes.
- 6.4. Traditionally, the civil construction industry has taken unqualified young people and trained them on the job. Most companies (both large and small) have their own training programmes which are usually linked to some extent into the Qualifications Framework via Connexis.
- 6.5. As the industry currently takes on new entrant workers who don't enter the workforce with applicable skills, there is a productivity cost in training these workers, and a risk they will leave the industry or be unproductive in the long term if they cannot be properly engaged or build the required skills effectively.

Anecdotally, a new entrant worker takes around six months to reach a level of competence where they are financially contributing to a business.
- 6.6. The vast majority of training in the civil construction industry is done on the job, either out in the field or in dedicated sessions in training rooms or offices.
- 6.7. Many employers (especially medium to larger sized companies) prefer to provide training directly to employees because they can ensure value for money by providing the specific training needed for the work they do, at a time and place that best suits them, and train people as a part of their business culture.

- 6.8. Managing training delivery ensures quality and health and safety standards are met and provides value for money by providing the specific training needed for the work employees perform, at the time and place that best suits the needs of employees and employers.
- 6.9. In many cases, training may be aligned to industry qualifications but not all employers register their training and achievements using the NZQA Framework, and mostly they are not incentivised to do so. We need to ensure a holistic view so the new delivery system we put in place attracts both employers and employees to engage in nationally recognised qualifications, and the delivery system.
- 6.10. CCNZ strongly supports increased industry and employer engagement in education. We believe one of the critical issues is the responsiveness of our vocational training system to the changing needs of industry, which must be serviced by good understanding of upcoming industry skills needs.
- 6.11. Our members run their own training and people development systems. Many operate their own training sites to teach people how to use their equipment safely and skilfully, sometimes bringing in external trainers to support their teams. The industry has worked with Connexis to support learners and recognise the existing skills and expertise of people who have been in the industry for some time but either have no formally recognised qualifications or have lower levels of qualification.
- 6.12. In 2015, CCNZ worked with Connexis to develop and launch [Civil Trades](#), the equivalent to an apprenticeship scheme for the civil construction industry, requiring a level 4 qualification, 8,000 hours of work in the industry, industry references, and completion of a professional interview to ensure the person is fit to undertake work unsupervised and to supervise the work of others.

7. Work-based learning

- 7.1. Many civil construction workers have extensive knowledge and skills about a range of subjects such as road building and maintenance, three waters infrastructure installation and maintenance, ground stabilisation, operation of heavy earthmoving machinery, geotechnical work and directional drilling.
- 7.2. This knowledge ensures performance of the work meets agreed standards of quality with clients. Trainers are often at the supervisory level in a business and must conduct their own work as well as supporting colleagues to gain skills. So, trainer capacity is a significant limiting factor on the industry's capacity to scale up.

- 7.3. In recent years we have seen less people taking the engineering or surveying diplomas and more doing engineering degrees. This does not align with industry, which is looking for more technicians and is already well serviced by degree-qualified engineers. Industry needs engineers that understand how work is conducted in practice, not just applied in theory.

8. Construction vs infrastructure

- 8.1. Historically, vertical construction has been well understood and training has been delivered through trades education, while horizontal construction has not. We support horizontal infrastructure and vertical construction being separated. They are fundamentally different structurally, commercially, and philosophically. The skillsets required by each are different, and horizontal construction is closer to quarrying and extractives than vertical builds.

We think the definitions of the two sectors in the proposal document are inaccurate, and need to be better defined, more along the lines of horizontal and vertical build definitions.

- 8.2. That would mean “infrastructure” would include the groups supporting the horizontal market – civil (roads; bridges; tunnels; water, electrical, and telecommunications infrastructure, etc), water, electrical engineers, and electricity network companies. “Construction” would include the groups that support the vertical market – builders, plumbers, electricians, etc.
- 8.3. When its needs are recognised at all, infrastructure has often been seen as the poor cousin to the vertical trades such as carpentry, which are well serviced through polytechnic training and managed apprenticeships. This impacts enrolment into all levels of qualifications but especially the apprenticeship trades.
- 8.4. Even if someone graduates from school or an ITP, they will not currently hold basic civil construction skills (for instance knowledge of what a plate compactor is and how to move it safely around a work site). Because education is not meeting its needs, the civil construction industry has taken on education and training responsibilities for workers.

9. ITPs and other providers

- 9.1. We are relatively neutral about a return to regional ITPs. While the civil construction sector doesn’t rely on ITPs, it is likely that they could have a role to play in pre-trade training. This could be more focussed through the support of trades academy delivery or specialist block courses that require detailed theory delivery (e.g. pipe construction and maintenance block courses, et al).
- 9.2. Industry consistently says it wants choice for training, so the retention of an ITP network could allow for this. However, historically ITPs have been disconnected from the “markets” they should serve. The proposal notes ITPs will have regional

delivery and a community focus and engagement. Nowhere is the importance of being connected to industry mentioned.

- 9.3. Industry engagement is crucial for the success of ITP-delivered programmes. We submit that connection to industry should be the most important criterion, and achievement against all criteria should be measured to gauge success. Then, we need to consider how to ensure a consistent curriculum with consistent delivery across all ITPs offering similar courses.
- 9.4. Industry must have confidence that a specified qualification gained in Northland and an equivalent one gained in Southland (and everywhere between) are comparable and consistent, with graduates exposed to the same methodology and assessed in the same way.
- 9.5. Our industry is not just regional, it is also national. We need basic infrastructure delivery which is linked to trades academies in schools at all ITP locations. We see no reason why there couldn't be delivery for other skills as well i.e., leadership, supervision, and mentoring. Equally, the old "night class" model that was used for the delivery of, for example, engineering qualifications, could be brought back which would offer more support for our industry.
- 9.6. While ITP mergers could offer some benefit (removal of back office administration, shared computer systems, etc) this should only be explored if they do not limit educational delivery.
- 9.7. However, we do not support the federation of poor performers being brought together, anchored to the successful TOP (the open polytechnic), and expecting them to perform differently. The risk of dragging each other down is too high in our view.
- 9.8. If the ITPs are not performing, they should be set up with a statutory board and action taken to clean them up - don't attach them to a model that works. Once they are financially and academically sustainable, consider the federation model then.
- 9.9. One issue that should be addressed through the reform is competitive protectionism around programmes. Delivery programmes should belong to the country and be shared across the ITP network.
- 9.10. Under the previous setup, many polytechnics offered the same programmes but were setting up competing campuses in other regions. Competitive marketing between polytechnics was wasteful and did not add value.
- 9.11. Whatever is decided, industry must be included in any design and governance. If programmes don't meet industry's needs, companies will not support or connect with them. ITPs will need good governors who are prepared to make hard decisions, and people with sound business and education experience and industry connections.

10. Workforce development councils

10.1. There appears to be an assumption in the consultation that, as the cost of WDCs is (apparently) \$50m or \$60m annually, while the cost of the former ITOs was around \$10m to \$12m annually, then WDCs must be less efficient than ITOs.

10.2. It is worth noting that Workforce Development Councils were formed by combining the standard setting functions of ITOs and including additional functions that supported industry connection. These functions had not been appropriately scaled or funded in the ITO model.

10.3. Of course, no such comparison can be made without adequate costing of the two models being available. It may be, for example, that ITOs were chronically underfunded and would have been more successful if they had been funded to the level of the WDCs.

10.4. While CCNZ holds a good relationship with its WDC, (Waihangā Ara Rau - Construction and Infrastructure), we accept that the wording of the Orders in Council that provided the foundation documents for the WDCs were weakly worded and could lead to inconsistencies. There may be an opportunity to revise this.

10.5. Benefits of WDCs:

- Link between funding advice and industry
- Clear industry-relevant strategic groupings and planning
- Amplify industry engagement
- Obligation to consult with industry
- Focus on developing and connecting sectors that have not previously been recognised or had career pathways – for instance temporary traffic management

Drawbacks of WDCs:

- Require good connection to their industry bodies and companies working within each sector to be successful
- Required manual information transfer between industry, and there is little incentive for companies to participate
- Some members have advised that WDCs can add complexity to a system that is already confusing and hard for employers to engage with
- Orders in Council did not establish a clear and consistent briefing for these organisations when established. The consultation process to create Workforce Development Councils bore little resemblance to the Orders in Council that were used to create WDCs, and some of the end product did not make sense.

- If the decision has already been made to revisit this process to re-shape WDCs, it is worthwhile providing clear and measurable objectives for these organisations to improve consistency.

11. Standard setting, qualification development, etc

11.1. We consider this in two parts – first the process for standard setting, qualification development, assessment processes, workforce capacity and planning, and system funding. The second is training delivery and assessment, trainee management, and trainee pastoral care.

11.2. We believe that the separation of standard setting and programme design from delivery supports industry well. We submit this should be preserved in any new system. Specifically, the research, relationship management functions and clear timelines for qualification and standards review is important, and the connections between industry with effective relationship management have gained positive industry support.

11.3. Our preference is to retain our WDC – this has been the one success from the RoVE reforms. Waihangara Ara Rau is working very well, is inextricably linked to the industries that it serves, is connected with industry to the future direction of and demand for vocational training to support industry strategic objectives, and offers a direct communication and funding line to TEC.

11.4. The sense that we have is that the decision to disestablish WDCs has already been made. However, no meaningful justification had been provided to support this decision. The statement that they cost money to operate has not been counterbalanced with any assessment of the value they provide. More detailed analysis must be completed (in partnership with industry), before any final decision is made.

11.5. If this “choice” is a fait accompli, while neither option is particularly visionary, on balance we would opt for option B, but with some very important changes. Specifically:

- A strong and well-defined workforce planning function. Workforce planning is highly valued by industry and receives little mention in the proposals. It is important to link demand with the supply of education and training provision and have a system-level multi-year view. Industries do not have the capacity to do it themselves and it is something that they really value. Without this function, training provision may not meet future needs.
- A truly independent voice and a more strategic system view.
- Clear expectations, rules and incentives to ensure national consistency.
- A greater focus on supporting work-based training.
- A strong advisory function to TEC, which represents a strong voice into government.

- 11.6 We do not support NZQA being the standard setting body. They are currently the weakest link in the quality assurance system, and their support for industry qualifications is questionable. For example, they have historically and consistently failed to recognise the equivalence of qualifications held by skilled civil workers entering New Zealand through the immigration pathway, leading to the conclusion by Immigration NZ that they are unskilled migrants.
- 11.7 Standard setting should be funded separately to ensure that this function takes place when it needs to, is well resourced, and is connected to the appropriate industry. This is one reason why Waihanga Ara Rau has been successful.
- 11.8 The proposal suggests funding should incentivise regional engagement with industries, but most industries are national not regional, where consistent qualification development, standard setting, assessment, and programme delivery are critical for industry confidence.
- 11.9 If there were to be an element of regional focus, it should be through the development of programmes that align with a regions economic output, significant projects, or some specialisation leading to a Centre of Excellence.
- 11.10 Those Centres would be rewarded through strong enrolments and academic achievement. Students would be attracted to remain in the region in which they have trained as there is a direct linkage to potential employment opportunities. Success would be measured by completions and academic performance. In this scenario, incentivising this would lead to more successful outcomes and encourage only those who genuinely intend to complete qualifications and programmes of study to enrol.

12. Training delivery

- 12.1. We support the concept of our work-based learning unit, Connexis, becoming a standalone entity. While there is little detail provided in the proposal document, we believe that with strong industry input, a fully focussed Connexis has the potential to strengthen VET delivery.
- 12.2. Industry needs choice for work-based education delivery and this proposal most closely aligns with this. Given that it was the “lift and shift” model that pulled the previous ITO into the Te Pukenga model, this should be easily reversed with little impact on current learner enrolments and future enrolments.
- 12.3. Historically, training advisers in some ITOs were skilled industry professionals that held the qualifications they were advising businesses on enrolling in. This is valuable to industry – both the trainee and employer receive direct support for positive learning outcomes where training advisers can also support and mentor trainees at a technical level.
- 12.4. The move to training advisers that are sales-based has not supported good education outcomes or developed a strong relationship with industry. This is important to many sectors, as they gear up to expand to meet demand that is coming, need assurance they are enrolling into the appropriate programmes and

learning, and that the wider learning journey will be well supported.

- 12.5. A training provider should not be funded based on “wish-casting” to predict the number of trainees it will enrol into programmes per year. A better method for determining enrolment patterns needs to be developed to ensure the focus is on learning outcomes; not “bums on seats”.

13. Private Training Entities (PTEs)

- 13.1. We do not agree with a moratorium on industry training providers. Choice and innovation are success factors. Successful PTEs flourish because they set up to meet the training and workforce needs of industry. Any action to limit these is unhelpful and unwelcome.

14. Funding

- 14.1. We believe that the proposed reforms are being driven by the poor financial state of the vocational sector rather than learner and industry outcomes. That is not, in isolation, an acceptable reason for such significant structural change.
- 14.2. We are deeply concerned with the comment *“ITP’s and PTEs will require re-balancing of funding back toward provider based delivery. These changes will be to be delivered within the current level of overall funding for vocational education”*.
- 14.3. This suggests that currently profitable work-based learning will be used to prop up other PTE functions as part of the reset. Industry funding has played a significant role in the success of work-based learning, and these funds ultimately need to be used to support the reestablishment of our work-based entity in its new form.
- 14.4. The sector is concerned the work-based learning model will be undermined by the proposed funding shifts. Employers train and develop the workforce in this sector, and should receive better support and encouragement to take on and support learners, building the capability and capacity of the infrastructure construction workforce.
- 14.5. Equally, we do not support a return to the provider based rates from 2020. The world has fundamentally moved on since then. We are concerned at the impact this would have on the feasibility of delivering education and training needed to prove competency on a job i.e., the availability of industry equipment and machinery in the regions.
- Provider-based funding was insufficient in the past and brings into question how education can truly respond to potential increased demand for training as well as manage itself through another round of significant reform.
- 14.6. The proposals are biased towards providers, and therefore against work-based trainers. There is some comment on industry needs, but silence on what the funding proposal will do for improving industry outcomes. The reality is that employers invest

considerable funds into training, and the bulk of training is delivered on job outside the formal education system.

- 14.7. Much of this training is not recognised by formal qualifications. We need training delivery and qualifications to better support the on-job education model. The on-job training model is superior as learners will be in real-world situations. Employers should be incentivised and supported to help people learn on the job – i.e. through funded apprenticeships.
- 14.8. The document suggests the funding success of work-based training has been at the expense of provider-based training, and further suggests unified funding has driven the growth of work-based delivery surpluses. However, no analysis is provided to support this opinion, and we would suggest the reality is quite different.
- 14.9. In our experience, training delivery is what is lacking. Education has so far refused to fund employer-led training delivery for the infrastructure workforce, which has led to a disconnect between education and real-world skills.
- 14.10. Our position is that strong relationships, agreed shared outcomes, and a close connection with industry have driven surpluses in work-based learning. And these surpluses arise from successful performance, genuine industry connection and outcomes-based learner engagement.
- 14.11. In contrast, provider-based education has become disconnected from industry, and its value proposition is currently heavily reliant on classroom time and trainee numbers not learning outcomes.

15. Use of industry's financial contribution

- 15.1. Connexis has been a commercially successful entity in its own right, and currently has significant cash resources of, we understand, more than \$40m. This comprises mostly employer contributions and contributions due to Unified Funding. We approached the acting Chair of Te Pūkenga seeking assurances that these cash surpluses would be ringfenced for reinvestment to support our industry training.
- 15.2. The response was that Connexis's reserves "will be managed as part of the overall Te Pūkenga business, to invest in resources to ensure delivery, and of course to off-set various costs".
- Our strong expectation is that money paid to Connexis by civil construction employers was paid for the express purpose of funding civil construction training, along with associated unified funding, and that these funds will be ring-fenced to be used as intended, not absorbed into the wider Te Pūkenga budget or to offset unrelated losses.
- 15.3. Members have noted many ITPs are financially not successful, while work-based learning organisations like Connexis and BCITO are making surpluses. This is possibly due to overhead expenses in the physical 'bricks and mortar' infrastructure of ITPs. Courses should be costed to cover these, where there is value or need for

block course training.

Rather than taking funds from work-based learning organisations to subsidise ITPs, the fees should be lowered or surpluses reinvested to support industry training initiatives - training is "for industry" not necessarily "for employer" as people move around. Having a more centralised fund for this would be good.

If there is no incentive for employers to support staff with qualifications, they will simply conduct the training required to ensure safety and competency without connecting it with the formal education system – meaning learners will not have their skills recognised, which is a poor outcome for all involved.

15.4. We are open to, and would welcome, further discussion about the ownership of Connexis and how it would be governed. We believe there is an opportunity for industry to take a greater ownership and governance role. We expect that the cash balances currently held will follow Connexis, wherever it ends up.

We will not accept these cash balances being used to offset other Te Pukenga losses.

16. Immigration and education context

16.1. Immigration is currently unable to recognise the skillsets of many workers involved in infrastructure construction, because education does not formally recognise these skills or have ways of recognising competence.

16.2. A targeted recognition of current competency process is an important avenue for the immigration pathway, and to recognise those people who are working in the industry without skills recognition.

16.3. Attracting international students focuses on subsidising the NZ education system through “bums on seats”, with success based on the potential prestige of the school the student is attending. We question why attracting and developing top international talent is not the focus, through immigration that allows skilled and able individuals the opportunity to move to NZ, and clearly shows the aspirational career pathway.

16.4. Without well-connected recognition of current competence (RCC) pathways, New Zealand does not benefit from international students, apart from the revenue attached to them and the prestige of having them enrolled.

16.5. We have significant concerns about the lack of recognition of current competence (RCC) pathways for skilled workers. These pathways are important for international workers who are skilled and work at a high level but are not recognised with a formal qualification. A good RCC process is vital to support the domestic workforce, and also recognise the capabilities of any migrant workers so they can join the workforce

in a way that makes the best use of their skills.

16.6. ITPs can play an important role in supporting overseas qualified workers such as civil engineers to transition to work in New Zealand, however more industry connection is needed to ensure these workers are able to join the workforce once they have completed any qualifications required to transition to the New Zealand workforce.

16.7. Without immigration pathways and better recognition of competence for skilled people entering the country, most of the students will eventually return to their home country and take their skill with them or settle in New Zealand without the ability to fully utilise the skills they have developed overseas.

17. General questions

17.1. The proposal document asks if there could be benefits or drawbacks for different students under the proposals.

17.2. We are of the view that all learners have the right to access education and higher learning opportunities, regardless of gender, culture, beliefs, sexual orientation and the like. The successful promotion of programmes of learning and good learner support will enable all learners to succeed in a programme of education.

17.3. On a final note, Centres of Vocational Excellence were set up under the Reform of Vocational Education but are not mentioned in the consultation paper. CCNZ has a positive perception of the Construction Centre of Vocational Excellence (ConCove), and has built a relationship with this organisation, which has enabled further academic research based on industry and workforce needs.

There is very little primary academic research on civil construction and several other segments of the construction industry, which is something ConCove has been able to progress in a positive way.

ConCove has filled a gap in NZ's workforce research and improved public understanding of the challenges construction faces, and opportunities for the country to overcome these challenges. It is important that we can see and respond to changes rapidly, and this is something organisations like ConCove can support.

We comment that the future for ConCove should at least be considered as part of this reform, and we support the continuation of ConCove and its industry-connected research.

18. Conclusion

18.1. Thank you for the opportunity to make this submission. We would welcome the opportunity to make a verbal submission in person and clarify any points from our submission.

Kind regards,



Alan Pollard
Chief Executive Officer
Civil Contractors New Zealand Inc.
alan@civilcontractors.co.nz
021 576 109



Principal Business Partner