

18 May 2025



# Submission on Establishment and Coverage of Industry Skills Boards (ISBs)

## Introduction

Thank you for the opportunity to provide feedback on the Consultation Document that is proposing the establishment of seven Industry Skills Boards as part of the vocational education and training reforms.

PrintNZ is the industry association that represents the print and packaging industries in New Zealand. Print and packaging are niche industries that are vital to the economy. They are incorporated into almost every product and service made in New Zealand whether used locally or exported.

We have around 500 member businesses located across the length and breadth of New Zealand, with our membership representing more than 85% of the turnover of the combined industries. Our membership includes businesses with as few as one employee through to those with more than 1000 employees.

The industries are highly skilled and rely on training that is fully delivered in the workplace as there are no facilities or expertise currently in the tertiary provider sector.

PrintNZ has been actively involved in industry training and has provided regular submissions on the vocational education and training reforms in recent years in order to ensure that the requirements of niche industries that rely on work-based learning have a strong employer voice, and that the system can deliver industry-led, cost effective, learner centric, consistent, sustainable and accessible training.

## ISB Proposed Coverage

The discussion document outlines coverage areas across seven proposed ISBs which we note is one more than the current six WDCs. The proposed new Automotive and Infrastructure ISBs have both previously had coverage and industry involvement within the current WDCs and the rationale for the establishment of these two independent bodies is not clear. We are concerned that with an indication that the ISBs will operate on a substantially lower cost base than the current WDCs, the addition of a seventh organisation and the inherent establishment and running costs has the potential to increase operating costs rather than decrease them.

The printing, packaging and sign making industries are part of the coverage of the proposed Manufacturing and Technology ISB and we agree that this is the natural fit for our industries as this is

consistent with the current WDC coverage with Hanga Ara Rau where the industry has been fully involved in print-specific and broader industry initiatives across the coverage of Hanga Ara Rau.

Currently, coverage of the WDCs is defined by the use of ANZSIC industry codes that are included in the Orders in Council for each of the bodies. This consultation has used short definitions that mean there a number of gaps and omissions and makes comparing actual coverage with proposed coverage difficult.

Comments about the coverage of Manufacturing and Technology.

- Manufacturing and Technology ISB could also include Engineering in its title as it previously had. This is a large industry sector and worthy of separate recognition.
- Automotive as described in the consultation document could remain with Manufacturing, Engineering and Technology.
- There are a number of potential omissions where greater clarification is needed:
  - Printing should be listed as Printing, Packaging and Signmaking (Sign making is currently listed as part of furniture making). These three sectors are intricately linked with a cross-over of skills, equipment and technologies and are frequently referred to as a single industry.
  - Drilling, mining and quarrying may have a better fit with infrastructure
  - Civil engineering is named as part of the Infrastructure industries while, mechanical, electrical and chemical/process engineering are not mentioned but could be incorporated into the Engineering catch-all in the Manufacturing, Engineering and Technology ISB.
  - Pharmaceutical and medicinal product manufacturing is not mentioned.
  - Robotics is a growing industry and not mentioned.
  - Some of the niche industries such as locksmithing are not mentioned and may need a catch-all under the ISB to ensure they are covered.

## Transfer of some coverage to the NZQA

The proposal to transfer business administration, information technology, creative and visual arts and graphic design to the NZQA seems to be at odds with the industry-led approach of the VET reforms. There is also a question of the appropriateness of the ISB functions being added to the full and complex roles that NZQA currently has.

The three coverage areas that were covered in NZQA before the WDCs came into force had very little input from industry and employers were disengaged from the processes associated with having good qualifications in these important areas

The consultation document seems to endorse the previous “hands-off approach” of NZQA saying the functions of programme endorsement, strategic workforce planning and investment advice will not apply to the areas covered by the standard setting role of NZQA.

PrintNZ acknowledges the generic nature of some of the qualifications that NZQA will again be the standard-setter for but believe that the functions of Creative Services, Graphic Design, Visual Arts and Information Technology are not generic and should be included into the ISB coverage.

By its very name, Information Technology could be part of the Manufacturing, (Engineering) and Technology ISB, and we also believe that Creative Services, Visual Arts and Graphic Design would sit well in this ISB as they, along with Manufacturing and Technology are very high-tech sectors. Graphic Design is a key part of the printing industry and we see this as a natural partner in this ISB.

This would leave the more generic qualifications of Business Admin and Computing with the NZQA but this should not preclude the need for industry involvement in the standard setting process.

## Transition arrangements

The tertiary system has been in transition for over five years. The consultation document points to another shift that will have consequences for industry with a very challenging timeline for implementation. It will be important to ensure that transition plans are thorough, clear and create little to no disruption to the learner and business stakeholders.

The following areas will need to be included in Transition Plans that will be developed alongside/by the Establishment Advisory Groups.

### **ISB funding**

There are not yet indications of the level of operational or transition funding for the proposed ISBs apart from informal comments that this will be lower than current levels with some comments that it may be halved.

An examination of the functions of the WDCs and the proposed ISBs shows little difference. Both have responsibilities for standard-setting, programme development and endorsement, moderation, providing advice to the TEC and providing a strategic overview of skills for their sectors.

Therefore, clarification of the depths to which the new ISBs will be required to operate in their lower funded futures will be required.

Again, the creation of seven ISBs would suggest the potential for the funding to be spread thinner, possibly impacting achievable outcomes for the ISBs.

### **Communication with industry on the new arrangements – who and when?**

It is important that new arrangements are clearly communicated. There will be costs associated with these communications that will need to be costed into the transition arrangements.

### **Development of Orders and Council and formalising industry involvement within those**

PrintNZ recommends the inclusion of Industry Stakeholders Groups within the Orders in Council of the ISBs. These are currently a formal mechanism within Hanga Ara Rau but not formalised for all WDCs. The Industry Stakeholder Groups and National Industry Advisory Groups have played a key role in the interaction between the WDC Council and industry providing genuine and inclusive interactions that have enhanced the outcomes of the WDC and its stakeholders. They provide a verifiable industry engagement process and mandating their existence would ensure this operated across all work-based learning industries.

### **Retaining expertise currently within the WDCs for the new ISBs**

With another shift required for many of the staff currently involved in the WDCs, it is important that current expertise is retained in the system. The relationships and institutional knowledge of key staff within the WDCs will be vital to the success of the ISB transition.

### **Training resources**

WDCs have been responsible for the development of curriculum for the industries they represent. The transfer of this intellectual property needs to be clearly specified.

PrintNZ believes this material should be attached to the coverage and retained by the ISBs where the industries are assigned.

### **Electronic records and student management systems**

There is a need for clarity about how much will need to be invested by the new ISBs in the electronic records of the WBLs that they will have responsibility for during the two-year period through to the end of 2028.

## **Other matters**

### **Training levies**

The consultation document has left the door open for the possible introduction of training levies following more consultation and review of the legislation. While a levy approach seems attractive for some, PrintNZ believes the perception of an additional “tax on business” alongside the practicalities of collection do not warrant a change to the current legislation and would want to see considerably more consultation on this approach.

### **Establishment Advisory Boards**

PrintNZ support the proposed Establishment Advisory Boards and will seek separately to be involved in this process. We see these as vital to plotting a smooth transition journey, retaining the key elements of what has been, while creating opportunities for more successful outcomes in the future.

## **Conclusion**

PrintNZ supports the proposed Industry Skills Boards, but expresses concern about the financial impact of having seven ISBs operating with reduced funding. The coverage of the ISBs needs to be carefully reviewed to ensure that industries that rely on work-based learning have not been left behind and have a mechanism for both inclusion and participation in the ISBs.

The vocational education system must stay agile and forward-thinking to meet the changing needs of tomorrow’s workforce. This includes adapting to new technologies, global economic shifts impacting local jobs, emerging fields like AI, renewable energy, and data science, and evolving workplace preferences for learning.

I would welcome the opportunity to discuss this submission further.

A handwritten signature in black ink, appearing to read 'Ruth Cobb', with a stylized, cursive script.

Ruth Cobb

Chief Executive

PrintNZ

[Ruth.cobb@printnz.co.nz](mailto:Ruth.cobb@printnz.co.nz)

Phone: 027 2489404