



Vocational Education Reforms Consultation – Submission Template

This is the submission form to accompany the consultation document on the proposed options for the redesign of Vocational Education. Please use the consultation document to help you answer these questions.

There are no compulsory questions in this submission template.

The information you share in this consultation is being collected to further develop policy advice for the redesign of the Vocational Education and Training system. It will be used by the Ministry of Education, the Tertiary Education Commission, and the New Zealand Qualifications Authority for analysis of options and a report on the themes of submissions.

Your full submission along with your name will be published on the Ministry of Education website at the end of the consultation period in line with a transparent decision-making process.

If you consider that we should not publish your name or any part of your submission you will have the opportunity to indicate which part of your submission should not be published and why, for example privacy or commercial sensitivity reasons.

Submissions may be subject to requests under the Official Information Act 1982. The Official Information Act requires the release of the information unless there is good reason under the act to withhold it. We will consult with you before releasing any information you request not be published.

If you indicate your submission should not be published, please provide us with your email address so we can contact you in the event an Official Information Act request is received in relation to your submission.

Demographic questions, such as your ethnicity or region, are optional and your response will not be published with your submission. This information is being collected solely for the purpose of analysis.

You can find more information about the Official Information Act at <https://www.education.govt.nz/our-work/information-releases/making-an-official-information-request/>.

If you have any further questions, or wish to correct or withdraw your submission you can do so at VocationalEducation.Reforms@education.govt.nz



I have read and understood the privacy statement.

Yes

Your information

1. Are you submitting as an individual or on behalf of an organisation/company?
Organisation/Company

If you are submitting as a company/organisation, then:

2. What is the name of your organisation/company?
New Zealand Plant Producers Incorporated
3. Which region do you primarily operate in?
Wellington
4. Do you consider your community to be urban or rural?
Rural
5. Which of the following best describes your organisation?
Industry/Sector organisation, professional body, business association or union
6. Would you consider yourself to be a part of Māori industry/a Māori education provider?
No
7. If you are an employer, how many staff are in your company/organisation?
1 - 19
8. Which industry grouping best represents your company/organisation?
Food, fibre, and primary industries

Proposal 1: Creating a healthy ITP network that responds to regional needs

9. Do you agree with the consultation document's statements on the importance of ITPs?

As an industry body we partially agree with the consultation document's statements on the importance of ITPs. ITPs are indeed a vital component of the VET system, contributing to meeting regional and industry-specific skill needs. However, we believe that comprehensive regional coverage by ITPs is neither practical nor desirable, given New Zealand's small size and limited resources. Instead, a more effective approach would be to have fewer, financially sustainable ITPs that are better integrated with other parts of the VET system, including PTEs and employers. This would help avoid unnecessary competition, ensure high-quality learning experiences, and focus on specialised, low-volume, and regionally based programs that meet the needs of sectors like food and fibre

10. What do you consider to be the main benefits and risks of reconfiguring the ITP sector?

While Te Pūkenga's financial challenges are clear, further structural reforms are not necessarily the solution, especially since recent changes have not yet fully taken effect. Disbanding Te Pūkenga or introducing partial federation could risk reintroducing issues like fragmentation, harmful competition, and industry disconnect. The core challenges—unsustainable revenue, costs, and lack of scale—remain, and rationalisation, cost optimisation, and greater integration across the VET system are necessary. Regardless of the approach, government support will be needed to address sector deficits. Stability in regulation is key to preserving the gains from previous reforms and resolving ongoing issues.

Reconfiguring the ITP sector could result in better governance and more consistent and higher quality training. There is also an opportunity to achieve scale for some smaller sectors through strategic alignments. The current VET framework is driven by competition, rather than outcomes for trainees, industry and the economy.

11. Do you support creating a federation model for some ITPs?

A federation model, if implemented effectively, could enhance the sustainability of all ITPs, especially with the support of the Open Polytechnic for online and remote delivery. It is unclear why the proposal limits federation to only some ITPs, as the benefits would be more significant if extended to all. A comprehensive federation would improve strategic alignment and facilitate resource sharing, such as back-office functions, without needing to retain less desirable aspects of Te Pūkenga, such as a centralised head office, integrated leadership, or unified branding.

12. What are the minimum programmes and roles that need to be delivered by the new ITP sector for your region?

The horticulture and plant production sectors have unique skill needs based on regional specialisations across New Zealand. For instance, horticulture is a key industry in regions like Bay of Plenty and Hawke's Bay. It is impractical for every ITP to offer all food and fibre-related programmes nationwide; instead, the system should encourage specialisation to align with regional strengths. Given the nature of horticulture work and the low enrolments in some programmes, many essential skills are better taught in the workplace. The funding model must incentivise the most effective delivery methods, including hybrid approaches where suitable. Additionally, a central organisation should play a role in setting standards, brokering, and commissioning essential horticulture and plant production programmes that may not be viable under a purely volume-based funding model, ensuring ITPs or other providers are supported to deliver these key programmes.

13. What are the critical factors needed (including functions and governance arrangements) to best support a federation model?

Critical factors for supporting a federal model include shared functions and resources, such as IT systems and programme content, along with unified governance structures. The federation must operate with a common strategic purpose, focusing on meeting industry skill needs—particularly in each ITP's home region—while minimising duplication and

unhealthy competition. Additionally, it should align closely with other parts of the VET system. ITPs that initially operate independently should have the opportunity to join the federation in the future, and this should be made a compelling and attractive option for them.

Proposal 2: Establishing an industry-led system for standards-setting and industry training

14. Which option do you prefer overall?

Option B replace WDCs with industry-specific standard-setting bodies - Slightly prefer

Why?

Our industry does not support either option, as the options are perceived as favouring the ITP sector to the potential detriment of other parts of the VET system, particularly workplace-based learning. Our industry seeks a more thoughtful and integrated approach with a clearer rationale for interventions while maintaining current arrangements in the interim. The proposals for changes to WDCs lack a well-defined policy rationale, aside from possibly reducing costs and enhancing industry connections. Muka Tangata has already established strong ties to the food and fibre sector and would benefit from further structural changes to enhance its position in the industry. If changes are to be implemented, our industry favours option 2B, which would allow Muka Tangata to continue its functions under industry leadership, independent of training arrangements.

15. What are the main features and functions that Industry Training Boards (Option A) need to be successful?

For Industry Training Boards (Option A) to succeed, they must address potential conflicts of interest between standard-setting and training arrangement functions, which WDCs were originally designed to eliminate. This could be achieved through administrative or structural separation and distinct funding streams. The plant production sector advocates for a dedicated, industry-led ITB that maintains WDCs' current functions while adding a new commissioning and brokering role for sector-specific VET programs. This ITB should have majority representation from various food and fibre industries, including smaller ones, to ensure comprehensive sector involvement and leadership. A well-structured ITB could help to drive higher quality outcomes and to achieve the necessary scale.

16. Under Option A, how important is it that Industry Training Boards and non-Industry Training Boards be able to arrange industry training?

Very unimportant

Why?

Regarding Option A, our industry opposes the idea of Industry Training Boards or their non-ITB counterparts arranging industry training. Our sector believes that training arrangement should remain closely tied to the actual delivery of learning, rather than being integrated with the functions currently performed by Workforce Development Councils (WDCs). This stance is based on the view that WDC functions, which primarily involve standard-setting and quality assurance, operate independently at a system-wide level and should remain separate from the practical aspects of training arrangement and delivery.

17. What are the main features and functions that industry standards-setters (Option B) need to be successful?

For an industry standard-setting body in the food and fibre sector to succeed, it must effectively assess and communicate current and future skill needs to the government, set standards, develop qualifications, and endorse programs. Additionally, it should moderate assessments, ensure quality, gather and publish relevant data, provide funding advice to the Tertiary Education Commission, and carry out the proposed commissioning and brokering function. These functions are essential for meeting the sector's educational and workforce development requirements.

18. Are there any key features of the Workforce Development Councils that need to be retained in the new system?

The new system should retain its existing functions while adding commissioning and brokering roles for food and fibre VET programs. These functions are essential to keep the VET system industry-driven and vocational. Losing any of these roles could worsen skill gaps, negatively impacting productivity and profitability in the sector. Additionally, operational efficiencies could help reduce costs associated with these functions.

19. Are there any key features of how the previous Industry Training Organisations worked that should be re-introduced in the new system?

The new system should reintroduce efficient training arrangement functions, which are essential for maintaining the quality and sustainability of workplace-based learning. These functions provide crucial support for both learners and employers. Organisations responsible for arranging training should be encouraged to retain and expand their services, potentially using a client-management model to enhance their offerings which could include career advice, employer matching and placement support.

20. What are the possible benefits and risks of having a short moratorium on new industry training providers while the new system is set up?

A short moratorium on new industry training providers could provide benefits such as stabilising the new system and maintaining continuity with existing providers in some sectors where this is a benefit. However, risks include the potential degradation of industry training arranger functions if they operate independently from Te Pūkenga, reduced funding for workplace-based learning, and renewed tensions between ITPs and training arrangers. To minimise conflicts and enhance synergies, it's essential to keep training arrangement closely linked to delivery, ideally with at least one training arranger, and potentially multiple cooperating arrangers for sustainability.

Proposal 3: A funding system that supports stronger vocational education

21. To what extent do you support the proposed funding shifts for 2026?
Strongly don't support

Our sector opposes the proposed 2026 funding shifts, arguing they will negatively impact workplace-based learning, which is crucial for our industry. We contest the notion that the current system unfairly favours workplace-based learning, asserting that the opposite is true. The funding disparity disadvantaging workplace-based learning was a significant issue in the pre-2020 system, and we believe these proposed changes would exacerbate this problem rather than resolve it.

22. What benefits and risks need to be taken into account for these changes?

Shifting funds away from workplace-based learning could widen the gap between the VET system's output and the food and fibre sector's requirements. This change may result in a vocational education system that fails to properly equip learners with the skills needed in the industry, as workplace-based learning is crucial for this sector.

23. How should standards-setting be funded to ensure a viable and high-quality system?

Standard-setting should be funded as a core, independent function of the VET system, rather than through volume-based funding. To meet food and fibre sector needs, overall funding decisions should be balanced, without favouring ITPs or other providers. This approach ensures a viable and high-quality system that serves all stakeholders effectively. It also recognises that there are key skills needed by a small group of individuals in some industries that are critical to the success of rest of the industry or supply chain, for example; specific propagation skills, plant health and pest and disease management, etc. These skills have been undervalued, and underfunded, in the current system to the detriment of the plant production sector.

24. How should the funding system recognise and incentivise the role that ITPs play in engaging with industry, supporting regional development, and/or attracting more international students to regions?

The funding system should focus on incentivising ITPs and other VET providers to meet industry skill needs both regionally and nationally, while delivering high-quality learning experiences. It should prioritise catering to diverse community needs rather than specifically incentivising industry engagement, regional development, or international student attraction, as these are not core ITP functions.

25. What role should non-volume-based funding play, and how should this be allocated?

Non-volume-based funding is essential for a strategic approach to food and fibre VET. Eliminating the strategic component of the Unified Funding System would be detrimental. Instead, dedicated funding should support a commissioning and brokering role and enhance engagement and learning support for diverse learners, especially Māori.

Concluding questions

26. Could there be benefits or drawbacks for different types of students (e.g. Māori, Pacific, rural, disabled, and students with additional learning support needs) under these proposals?

The proposed changes could disadvantage Māori learners and other diverse groups who prefer workplace-based learning and learning in a Māori context. By favouring ITPs and classroom-based learning, these proposals may limit access to flexible and innovative programs that benefit Māori and rural students with approaches in the food and fibre sector. The funding system should maintain support for diverse learning approaches to ensure equitable access and outcomes.

27. Could there be benefits or drawbacks from these proposals for particular industries or types of businesses?

The proposed changes present several drawbacks for the food and fibre sector. They favor classroom-based learning over workplace-based learning, which better meets industry needs. Additionally, the volume-based funding system hinders the delivery of low-volume but essential VET programs and may disadvantage Māori and other diverse learner groups. The proposals fail to address critical skills gaps or the underlying funding issues, risking financial instability for ITPs and other VET participants. Furthermore, they contribute to ongoing uncertainty in the sector and do not align with government goals for the food and fibre industry and the broader economy.

28. Are there any other ideas, models, or decisions for redesigning the vocational education system that the Government should consider?

Our submission proposes that the Government consider an alternative model for redesigning the vocational education system: a dedicated, industry-led organisation that would take on the functions of Muka Tangata while also handling the commissioning and brokering of food and fibre VET programs.