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Ministry of Education

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## Submission on the proposal to replace NCEA with new national qualifications

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### Introduction

1. Energy Resources Aotearoa is New Zealand's peak energy sector advocacy organisation. We represent participants right across the energy system, providing a strategic sector perspective on energy issues and their adjacent portfolios such as vocational education and training. Our purpose is to enable constructive collaboration across the energy sector through and beyond New Zealand's journey to net zero carbon emissions in 2050.
2. We have a long and proud history of engagement in vocational education and training at both strategic and operational levels. Established by the energy industry in 2010, our workforce development unit, Energy Skills Aotearoa, plays a critical role in addressing sector-wide workforce challenges and implementing targeted skill development initiatives. These efforts are guided by a strategic framework focused on attraction, development, and collaboration.
3. This submission responds to the Ministry of Education's consultation on the National Certificate of Educational Achievement (NCEA), with a particular focus on *Proposal One; Working with industry to better integrate Vocational Education and Training (VET) learning*. Our feedback has focused on the proposal, most relevant to industry advisory, and we have not provided comment on the others.

### Background

4. The energy sector has been proactively addressing workforce issues through the *Re-Energise 2025* initiative, a cross-sector collaboration between Energy Resources Aotearoa, the Electricity Engineers' Association, Ministry of Business Innovation and Employment (MBIE), and other key energy stakeholders. This project is producing the first whole-of-energy-sector workforce report for New Zealand, with publication in December 2025.
5. The report brings together comprehensive survey data, company interviews, and education system mapping to provide clear insights into skills gaps, demographic challenges, retention issues, and training pathways. It also incorporates student perceptions of energy careers and highlights priority workforce actions.

6. The insights from Re-Energise 2025 should be directly leveraged to inform the development of VET subjects and pathways under NCEA reform. The energy sector is a prime example of where industry is already leading, and where government action must align with evidence-based workforce planning.

## **Submission**

### **Proposal one: Working with Industry to Better Integrate VET Learning into the Senior Secondary Qualification System**

7. We strongly support the intent of strengthening VET in the senior secondary qualification system by working more closely with industry. Ensuring that VET subjects are valuable, credible, and clearly connected to post school opportunities is essential for preparing students with the skills and attributes needed to thrive in today's workforce and in further training.
8. To achieve this, we recommend several priority areas must first be addressed as outlined below.

#### ***Resourcing ISBs properly***

9. The proposal envisions Industry Skills Boards (ISBs) playing a central role in shaping vocational education within the senior secondary qualification system. It is proposed they are tasked with designing and curating coherent VET subjects that align closely with real world industry needs and outcomes.
10. ISB's are still in early establishment phase and expected to operate with approximately half the funding and resource of the Workforce Development Councils they will replace. This reduced funding comes at the very moment ISBs are being asked to take on significant new responsibilities in developing vocational standards and VET subjects.
11. In practical terms, this underfunding means fewer staff, reduced consultation capacity, and limited ability to support schools and employers. Without proper resourcing, ISBs may be forced to prioritise administrative survival over curriculum design, leaving gaps in VET subject development and risking inconsistency across industries.
12. To succeed, ISBs need adequate investment not only to develop subjects, but also to consult widely, refresh standards regularly, and maintain long-term credibility with schools and industry.
13. Funding for ISB's to undertake the development of VET subjects for schools should be additional to the current proposed funding model.

#### ***Strong and transparent industry/school partnerships are essential***

14. For VET subjects to succeed, they must be co-designed in partnership by industry associations, Industry Skills Boards (ISBs), and schools. Employers bring real world insights about the skills and behaviours needed in the workplace, while schools

understand how these can be taught and assessed effectively within the curriculum. It will be extremely important to have teacher buy in.

15. If developed in isolation, VET subjects' risk either being too theoretical to prepare students for employment or too narrow to provide broad educational value.
16. Strong partnerships will ensure that qualifications reflect actual employment opportunities and can be delivered consistently across the country. Without genuine collaboration, there is a danger of fragmented design, duplication of effort, or subjects that fail to gain credibility with students, teachers, or employers.

### ***Stocktake before building new frameworks***

17. Before developing new VET subjects, a comprehensive stocktake of existing VET initiatives, unit standards and micro-credentials for years 9-13 should be undertaken.
18. The energy industry has already invested significant effort to establish a Learning Credit Package (LCP) for the Energy and Chemical Plant (ENCHEM) Level 2 qualification during the recent qualification review.
19. It is likely that other qualifications have also been developed but are not yet complete, and it will be important to clearly identify these and ensure these qualifications are well supported to reach their full potential.
20. To make these pathways work effectively, there needs to be dedicated workstreams to complete any outstanding learner resources, alongside clear systems for requesting assessments (with supporting materials) and ensuring assessments are checked and processed efficiently.
21. Currently, around 50% of the LCP enchem qualification has learner resources available, but without a clear workstream to complete the remainder, learners will be unable to progress through the full qualification.
22. Programmes such as gateway and STAR already provide thousands of students with valuable vocational experiences, but their success is uneven.
23. Some schools and industries report excellent outcomes, while others note fragmentation, poor alignment with qualifications, or limited student progression beyond NCEA. Without understanding what works and what doesn't, reforms risk discarding successful models, duplicating existing content, or failing to build on proven best practice.
24. A systematic stocktake would allow government and ISBs to scale what is effective nationally, refine weaker components, and design VET subjects that are both innovative and evidence based.

### ***Clear and coherent pathways***

25. Students, parents, and teachers often find vocational pathways difficult to navigate. Information is fragmented, inconsistent, or buried across multiple platforms. As a

result, students may not understand how their school subjects link to tertiary qualifications, apprenticeships, or jobs.

26. For teachers and career advisors, this lack of clarity makes it difficult to guide students effectively. A reformed VET system must include a centralised, student and teacher friendly platform that maps out coherent pathways. This will give young people confidence that their choices in Years 11–13 will lead somewhere meaningful, and it will help teachers and parents provide consistent guidance.
27. Without such a system, the risk is that VET subjects will exist in name but fail to attract or retain students because they cannot see the longer-term value.

### ***Equity at the centre of reform***

28. The consultation document highlights that students in schools with lower socio-economic barriers are disproportionately reliant on unit standards, often in fragmented programmes that do not lead to coherent qualifications or employment pathways.
29. For these students, the promise of VET reform is significant: well-designed subjects could offer structured, meaningful learning that leads to better employment and training outcomes. But if reforms are unevenly implemented, the risk is that inequities will deepen.
30. Rural schools and smaller schools may struggle to resource new VET subjects, limiting student access. To avoid this, reforms must include equity safeguards such as targeted MOE funding, regional partnerships, and flexible delivery models. Ensuring equitable access is not only a matter of fairness, it is also critical for building a diverse and inclusive future workforce.

### ***Evidence-based design***

31. The design of new VET subjects should be guided by workforce data and sector evidence, not assumptions.
32. In the energy sector, for example, sector reports such as Re-Energise 2025 will provide a robust evidence base on skills gaps, demographic challenges, and priority occupations. Evidence already suggests there is growing needs in electrical engineering, project management, and cross-sector transferable skills such as health and safety and digital literacy. By using this evidence, ISBs and the Ministry can ensure that VET subjects are directly relevant to workforce demand.
33. Without evidence-based design, there is a real risk of developing subjects that look good on paper but fail to provide the skills that students or employers actually need.

### ***Fewer, higher-quality standards across VET and academic pathways***

34. New Zealand's current 11,000 unit and skill standards are widely acknowledged as fragmented, inconsistent, and variable in quality. Rationalising this system into a

smaller number of coherent VET subjects is an opportunity to improve quality, reduce duplication, and simplify delivery.

35. However, this shift must be carefully managed. If new VET subjects are poorly resourced, or if they are perceived as less rigorous than academic subjects, they risk being treated as a “second tier” pathway. This would undermine the credibility of vocational education and deter students from pursuing it.
36. To avoid this, the emphasis must be on building fewer, stronger, and clearly valued subjects that are seen as equal in status to academic pathways.

### ***Supporting teachers to deliver VET***

37. Teachers are central to the success of any new curriculum initiative. Yet many schools lack staff with recent industry experience or training in vocational teaching.
38. Often teachers will deliver subjects that are of interest and therefore easier for them, so professional development will be essential to equip teachers with the skills, confidence, and resources to deliver new VET subjects effectively. Without this investment, implementation risks being patchy, with some schools offering rich, engaging programmes and others struggling to deliver even the basics.
39. Industry partnerships can also play a role here, providing real world context, site visits, and mentoring to support teacher capability. Supporting teachers is not a “nice to have”, it is the difference between reform that succeeds in practice and reform that remains theoretical.

### ***Phased implementation, not rushed***

40. The proposed reform timeline is ambitious but rushing development risks producing poorly designed subjects that are difficult to implement. Schools need lead in time to plan timetables, resource staffing, and engage with new content.
41. ISBs, still in establishment phase, also need time to build capacity before they can credibly lead curriculum design. A phased approach would allow for piloting, feedback, and refinement before full national rollout. This would reduce risks for students, teachers, and employers, and increase the likelihood of long-term success.

### ***Monitoring for impact***

42. Reform should not end with the rollout of new subjects. Ongoing monitoring and evaluation will be essential to track student outcomes, equity impacts, and alignment with industry needs.
43. Data collection should include uptake by region, school type, and socio-economic background to ensure equity is achieved. Monitoring should also assess whether students progress into further training or employment, not just whether they complete credits.

44. Without strong monitoring, there is a danger that issues will only be identified years later, after opportunities for improvement have been missed. A built-in evaluation framework will allow the system to adapt and evolve in real time.

## Conclusion

45. Proposal one presents a significant opportunity to lift the credibility and value of vocational education in schools, aligning learning more closely with industry needs and real career pathways.

46. However, success will depend on whether ISBs, significantly underfunded and still in establishment phase are properly resourced and supported. A stocktake of current initiatives must be the starting point, and industry associations, ISBs, and schools must work in partnership to map vocational qualifications. Insights from workforce reports such as *Re-Energise 2025* should directly inform subject design to ensure reforms are evidence-based, coherent, and connected to real career opportunities.

47. With adequate resourcing, phased implementation, and strong collaboration, this reform could deliver transformative benefits for students, industry, and the wider economy.

48. We look forward to working alongside the Ministry of Education and welcome further engagement with officials. Please do not hesitate to contact Sheree Long, Director, Workforce Development at [sheree.long@energyresources.org.nz](mailto:sheree.long@energyresources.org.nz) or **telephone: 021 119 3362** should you wish to discuss or clarify any parts of our submission.