



## SUBMISSION

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Submission: Terms of Reference: Inquiry into Ports and Maritime Sector

To: Transport and Infrastructure Committee

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## **About Ia Ara Aotearoa Transporting New Zealand**

Ia Ara Aotearoa Transporting New Zealand is a national membership association representing the road freight transport industry.

Our 1,200 member companies operate and support urban, rural and inter-regional commercial freight transport services throughout the country.

As the peak body and authoritative voice of the road freight sector, Transporting New Zealand helps trucking firms operate successful, safe and sustainable businesses. Our strategic priorities are:

- Providing one industry voice for advocacy
- Promoting the road freight transport industry
- Attracting talent and promoting workforce development
- Supporting our members and customers
- Sustainability, safety and responsible emissions reduction

New Zealand's road freight industry employs over 31,000 people and has a gross annual turnover in the order of \$9.73 billion ([Stats NZ, Deloitte analysis](#)). Road freight transport accounts for 93% of the total tonnage of freight moved in New Zealand ([MoT National Freight Demands Study 2018](#)).

## **Transporting New Zealand submission to the Transport and Infrastructure Committee on its Terms of Reference: Inquiry into Ports and the Maritime Sector**

1. Transporting New Zealand appreciates the opportunity to make a submission to the Transport and Infrastructure Committee (the Committee) on its Terms of Reference: Inquiry into Ports and the Maritime Sector.

### **General comments**

2. Transporting New Zealand appreciates and agrees with the Committee's view that the efficiency and competitiveness of ports and the marine sector are essential to the productivity and economic growth of our country.
3. Transporting New Zealand is also pleased and supportive to see that the Government is focussed generally on lifting productivity and economic performance.
4. Over the last several years there have been a number of emerging issues in the areas of ports and maritime. More concerningly, from Transporting New Zealand's perspective, the risks associated with these issues appear to be increasing. The issues include:
  - a. A decline in port productivity levels over the last 3 years, both in container handling rate on/off ships; and container exchanges at ports (Appendix 1 refers).
  - b. The introduction of port charges and the increases occurring with those charges
  - c. Increasing risk to costs and charges for services over the Cook Strait
  - d. Reliability and resilience of transport over the Cook Strait
  - e. A decline in the levels of service available for crossing Cook Strait
  - f. Near miss health and safety incidents with vessels serving the Cook Strait
5. Transporting New Zealand welcomes and supports an Inquiry being undertaken.
6. Many of the members that we represent are responsible for moving the vast proportion of goods that either enter or leave our shores via the Ports. Similarly, many of our members are responsible for moving the freight between our North and South Islands. Therefore Transporting New Zealand is a key stakeholder in the Ports and Maritime space. Transporting New Zealand welcomes an invitation to meet with the Committee.
7. Transporting New Zealand expects that the assessments and evaluations undertaken during the Inquiry will be heavily evidence-based and be reliant on the best freight data available. It is a concern to Transporting New Zealand that at the same time that this Terms of Reference is being developed, the Ministry of Transport has announced that it is not proceeding with a new iteration of the National Freight Demand Study.
8. Transporting New Zealand recommends that the Inquiry be extended to include commentary on the risk that New Zealand is exposed to in the absence of quality multi-modal freight data, particularly in regard to: strategic planning, resilience mitigation planning and infra-

structure investment decision-making. The Inquiry should include explicit recommendations in this regard.

### **Specific comments on sections and focus areas of the proposed Terms of Reference**

#### *Section 1. Economic Contribution and Efficiency*

9. Transporting New Zealand broadly agrees with the proposed focus areas. Inquiring into those areas, in particular “Assessing the contribution of ports and maritime ...” and “Understanding how ports and related infrastructure interact...” is necessary to the understanding of how the sectors are currently performing. However, Transporting New Zealand is concerned that this may not result in meaningful progress in taking up the opportunities to raise the performance of our ports and maritime sector.
10. Transporting New Zealand recommends that it is made more explicit in the Terms of Reference that this Inquiry will direct improved performance, for example it include:
  - a. the performance of those sectors is analysed
  - b. opportunities to improve performance and the respective values will be identified
  - c. explicit recommendations that deliver improved performance will be made

#### *Section 2. Infrastructure and investment needs*

11. The ports and maritime sectors are key parts of a wider transport eco-system. Those sectors enable critical elements of a supply chain and therefore their efficiency and productivity cannot be seen in isolation. The connectivity of ports with other modes, particularly road and rail, must be considered as an integrated supply chain.
12. Transporting New Zealand believes the proposed focus area of “Reviewing the interface between ports and the relevant parts of the land and maritime transport system” is critically important and the Inquiry should give this area high priority and significant weighting.
13. Transporting New Zealand recommends that the Terms of Reference be more explicit in delivering recommendations that will not only will improve the efficiency and productivity of the ports and maritime sectors in themselves, but also the Inquiry deliver specific recommendations that will strategically improve the connectedness of transport with other modes.
14. Transporting New Zealand is mindful of the effort and cost required to undertake such an Inquiry and therefore it believes the scope and focus should be kept to a minimum. In terms of prioritising the focus areas Transporting New Zealand recommends that the Committee heavily scrutinise whether the following areas need to be in scope at this time, and if so, to what degree:
  - a. the adequacy and location of drydock facilities is dependent on the respective primary capability of the respective port. Therefore, Transporting New Zealand recommends that this consideration could be postponed pending the establishment

of a clearer view on the roles and function of each of the ports from a strategic network perspective.

- b. reviewing technological developments in the sector could be better left to the responsibility of each of the port
- c. Looking into the safety practices: there has been considerable focus on safety in recent years, for example the investigations by WorkSafe, prosecutions taken by Maritime New Zealand under the Health and Safety at Work Act, and since July 1 2024, Maritime New Zealand becoming the primary health and safety regulator for New Zealand's 13 major ports. Transporting New Zealand is concerned that there may be diminishing returns in further investigative efforts into these areas.

15. There appears to be growing appreciation of the impacts and risks on investment planning as a result of changing governments and political cycles. Transporting New Zealand recommends the Inquiry deliver specific recommendations in regard to the infrastructure planning and investment cycles associated with ports.

### *Section 3. Regulation, Governance and Ownership of Ports*

16. Transporting New Zealand supports the focus areas including governance, funding and ownership of ports. These areas are integrally linked to port investment, pricing and productivity.
17. Transporting New Zealand question whether the Inquiry needs to examine the role of Maritime New Zealand, particularly given the recent change referred in paragraph 14c. above. Transporting New Zealand is concerned that including this focus area will introduce increased risk of uncertainty within the regulator and adversely affect Maritime New Zealand's effectiveness in carrying out its extended responsibilities.

### *Section 4. Environmental Sustainability*

18. Transporting New Zealand recommend that rather than this Inquiry investigate the environmental impact of the sector, it leaves that task to the Climate Change Commission (He Pou a Rangi).

### *Section 5. Workforce and skills development*

19. Transporting New Zealand support this focus area.

### *Section 6. Security and supply chain resilience*

20. Transporting New Zealand support the Inquiry focussing on examining the sector's role in national security, emergency response, and supply chain resilience. Transporting New Zealand recommend the Inquiry consider that the findings and recommendation from this section should be key to informing recommendations in section 2 of the Inquiry.

**ENDS**

Appendix A

