

Consultation submission form

Building Code update 2022

Transition period for the energy efficiency of housing



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How to submit this form

How to submit this form

This form is used to provide feedback extending the transition period for the implementation of insulation settings in Acceptable Solution H1/AS1 and Verification Method H1/VM1.

When completing this submission form, please provide comments and reasons explaining your choices. Your feedback provides valuable information and informs decisions about the proposals.

You can submit this form by 5pm, Tuesday 14 June 2022 by:

- › email: buildingfeedback@mbie.govt.nz, with subject line Building Code consultation 2022
- › post to: Ministry of Business, Innovation and Employment, 15 Stout Street, Wellington 6011
or: Ministry of Business, Innovation and Employment, PO Box 1473, Wellington 6140

Your feedback will contribute to further development of the Building Code. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

Submitter information

Submitter information

MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the “About you” section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

A. About you

Name:

Email address:

B. Are you happy for MBIE to contact you if we have questions about your submission?

Yes No

C. Are you making this submission on behalf of a business or organisation?

Yes No

If yes, please tell us the title of your company/organisation.

D. The best way to describe your role is:

<input type="checkbox"/> Architect	<input type="checkbox"/> Engineer (please specify below)
<input type="checkbox"/> BCA/Building Consent Officer	<input type="checkbox"/> Residential building owner
<input type="checkbox"/> Builder or tradesperson (please specify below)	<input type="checkbox"/> Commercial building owner
<input type="checkbox"/> Building product manufacturer or supplier (please specify the type of product below)	<input checked="" type="checkbox"/> Other (please specify below)
<input type="checkbox"/> Designer (please specify below)	<input type="checkbox"/> Prefer not to say

Please specify here.

Submitter information

E. Privacy information

- The Privacy Act 2020 applies to submissions. Please tick the box if you do **not** wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- MBIE may upload submissions or a summary of submissions received to MBIE's website at www.mbie.govt.nz. If you do **not** want your submission or a summary of your submission to be placed on our website, please tick the box and type an explanation below:

I do not want my submission placed on MBIE's website because... [insert reasoning here]

F. Confidential information

- I would like my submission (or identifiable parts of my submission) to be kept confidential and **have stated** my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

If you have ticked this box, please tell us what parts of your submission are to be kept confidential.

Transition period for the energy efficiency of housing

We are proposing to extend the transition period for adopting new insulation requirements for housing in Acceptable Solution H1/AS1 and Verification Method H1/VM1. The proposed change would extend the transition period for 6 months to 1 May 2023. This proposed change considers feedback received in the 2021 consultation, changing circumstances in New Zealand's building and construction sector, and the importance of New Zealand's obligations under the Climate Change Response Act 2002.

Questions for the consultation

1-1. Do you agree with the proposed extension of 6 months to the transition time so that the previous lower insulation settings can be used until 1 May 2023?

- Yes, I support the extension of 6 months (1 May 2023)
- No, the transition period should remain the same (2 November 2022)
 - No, the extension should be longer (12 months to 1 November 2023)
 - Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

NASH wishes to acknowledge and thank MBIE for listening to the concerns expressed by sector players. The Consultation document is a thorough and balanced representation of the issues and challenges.

Under normal circumstances, and given the critical importance of improving the energy efficiency of New Zealand's housing stock for both the health of the occupants and of our planet, NASH would have advocated strongly for no extension to the transition period.

However, given the extraordinary demands upon the residential sector (high level of permits / shortage of housing), supply constraints (arising from lockdown of Auckland based manufacturing and failure of international supply chains) along with shortage of skilled trades, NASH supports the extension of transition time of 6 months.

The additional transition time needs to be used to ensure all components of the supply chain are well informed of not just the proposed changes, but how the proposed changes can be delivered in a practical and cost effective manner.

NASH would certainly like to see better alignment of BRANZ resources, along with MBIE's intended H1 direction.

Transition period for the energy efficiency of housing

1-2. What impacts would you expect on you or your business from the proposed change to the transition period?

These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

The benefits to our members, builders and homeowners from an additional 6 month transition period will be the opportunity to get this first step on the H1 transition to performance levels comparable to international standards right. To rush change when sector is under considerable pressure, significantly increases risk of mistakes and long term building failure.

Relieving some of the extraordinary pressure on our builders and sub-trades at this time is critical for the mental health of all involved in the sector.

Transition period for the energy efficiency of housing

1-3. What support would you or your business need to implement the changes by 1 May 2023 if introduced?

- Information about what the insulation changes are or what buildings they apply to
Education material on how the new documents can be used to comply with the Building Code
- Webinars from MBIE technical experts
- Other types of support (please specify below)

If there anything else you would like to tell us about the reason for your choice(s)?

As a member organisation who actively supports the overall direction of H1 review, (i.e. how New Zealand delivers houses to international levels of performance), we are disappointed that regulatory framework is not supported with R & D funding for sector organisations to develop the solutions which will enable emissions reduction and health benefits to be delivered.

In contrast we see significant government budget funding provided for GHG emissions reduction in transport, industrial boilers, agricultural emissions.

For MBIE (Building Performance) to deliver a successful transition to a low emission, circular economy will require a package of regulations and incentives. Currently the sector is only seeing regulation.

Given the complex internal environment within our buildings (energy efficiency, internal moisture, ventilation and acoustics), significant R & D will be required and MBIE need to provide funding support to the sector for this work to be carried out. A failure to invest in R & D will significantly increase the risk of failure.