BUILDING PERFORMANCE

Consultation submission form

Building Code update 2022

Transition period for the energy efficiency of housing

MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

New Zealand Government

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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

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:	Julien Leys
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.

New Zealand Building Industry Federation Inc.

D. The best way to describe your role is:

☐ Architect
☐ Engineer (please specify below)
☐ BCA/Building Consent Officer
☐ Residential building owner
☐ Builder or tradesperson (please specify below)
☐ Commercial building owner
☐ Building product manufacturer or supplier (please specify the type of product below)
☒ Other (please specify below)
☐ Designer (please specify below)
☐ Prefer not to say

Please specify here.

Membership organisation for the Building industry supply chain

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:

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?

The extension needs to be for a minimum of 12 months. Our members who include many in the supply and manufacture of insulation materials (from glass wool to window fabrication) feel that they need more than six months (which will also include the down time of the statutory holiday period) is not sufficient to make the necessary changes & investment to meet the new requirements.

In addition, from a national supply side the amount of the glass wool will need to increase under the H1 requirements from 9,000 tonnes to 30,000 tonnes per annum. With the extent of supply chain shortages, the extra 12-month extension will be essential for the building supply chain to gear up to ensure there are sufficient materials to meet the new H1 requirements. The key manufacturers and suppliers of insulation materials in the building supply chain simply will not be ready by 6 months even though some participants such as installers may be.

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.

A 12-month extension will allow the key members in the supply and manufacture of insulation materials (from glass wool to window fabrication) to be fully compliant and to meet the H1 Energy Efficiency requirements in the way that Parliament originally intended the legislation to be implemented. Forcing companies and individuals to be non-compliant by insisting on only a 6-month extension will be ignoring the reality of building material shortages and the time for fabricators to tool up which will be very unfortunate and have a range of unintended consequences.

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?

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

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

There would need to have assurances from Government / MBIE that if the building supply chain issues around shortages of glass wool and other materials impacted on the ability of providers, specifiers and builders to meet the requirements of the H1 Energy Efficiency then there would be no liability for any non-compliance.

BIF recommends a comprehensive training/education programme supported by MBIE and relevant industry bodies around specification & design, as well as the proper installation of product, particularly in the ceiling space.

BIF also support a national 'roadshow' that educates and trains builders, installers, designers and council authorities on the new H1 standards should be developed and implemented in the 12 month extension period.

BIF also supports recommendations from other insulation manufacturers and suppliers that BRANZ Appraisal or CodeMark certification will also be required – it is public knowledge and acknowledged that both organisations have struggled with backlogs and delays in appraisals or certification being issued – the H1 requirements will create additional significant demand for testing from building material suppliers placing even more pressure on the delays in appraisals or certification being issued.

Without having key industry documents available such as the BRANZ House Insulation Guide v6 & updated MBIE guidelines on required material R values (similar to the current 2008 document) the industry is being left to itself to establish new solutions and installation practices. This would be an example of an unintended consequence and unacceptable.