

24 November 2021

Ministry for the Environment
climateconsultation2021@mfe.govt.nz

To Whom It May Concern:

1. This submission is made by the New Zealand Green Building Council (**NZGBC**) to the Ministry for the Environment on *Te hau mārohi ki anamata* | *Transitioning to a low-emissions and climate-resilient future: Have your say and shape the emissions reduction plan*.
2. Thank you for the opportunity to contribute. We look forward to working further with government to take these recommendations ahead for a lower carbon healthier Aotearoa New Zealand.
3. NZGBC is a not-for-profit industry organisation dedicated to promoting a sustainable built environment. NZGBC achieves this by setting standards of best practice through green building rating tools; education and training for all areas of the building industry value chain; and providing access to networks, information and resources for our members to lead the market. Its vision is for all homes and buildings in Aotearoa to be green and sustainable, making healthier, happier New Zealanders.
4. We're a non-profit, that includes 600+ companies and organisations amongst our members, including banks, energy companies, insurers, government departments, publicly listed property companies, project managers, manufacturers, construction companies, architects, developers, designers and tertiary education institutions. This includes many of the NZX50. These members have a combined market turnover of \$40bn. We also work with local government members, representing over 60% of Aotearoa New Zealand's population.
5. Our submission will focus on the Building and Construction section of the consultation document, with a particular focus on energy efficiency, which we think has been underserved in the document.
6. The built environment is culpable for 20% of New Zealand's carbon footprint.
7. The fastest, most cost effective, and most equitable way to reduce carbon pollution is a far-reaching energy efficiency programme across all New Zealand homes and buildings. This energy equity programme would cut household bills, most notably amongst those struggling to adequately heat their homes in winter, business operating costs, and provide thousands of local jobs in every area of the country with homes and

buildings. An inclusive and well-planned climate transition must have this energy equity plan at its heart.

8. The New Zealand Green Building Council therefore makes the following recommendations:

- a) Update the Emissions Budgets in the ERP to align with the new NDC commitment and the 1.5 degree pathway recommended under the Paris Framework.
- b) The Government explicitly state its first preference is to meet emissions reductions targets through domestic reductions, followed by domestic offsets, and lastly international reduction or offsets - and commit to spending domestically to reduce or offset emissions at the same level as international offsets would cost.
- c) Align the Warmer Kiwi Homes programme with the healthy homes standard and provide those homes that have met the standard with a certificate to help market the home as healthy and warm.
- d) Begin a pilot deep retrofit programme to share with the sector how to reduce the energy use in homes by over 50%.
- e) Implement the Building for Climate Change energy efficiency standards in three, three-year steps, to achieve a near zero energy standard by 2030.
- f) The Government should view buildings as major energy consumers and an opportunity to make large energy savings freeing up electricity for the transport sectors move to EVs hugely helping to decarbonise Aotearoa. Many projects to decarbonise New Zealand cost vast amounts of money. Improving the energy efficiency of buildings delivers something very rare - carbon reductions and substantial financial returns (reduced energy bills). It is a double win.
- g) Set out a framework to drive all existing buildings towards the Building for Climate Change near zero energy standard over time.
- h) As an immediate priority, mandate use of NABERSNZ for all office buildings, hospitals, hotels, and retail buildings by June 2023.
- i) Create a measurement of the health and energy efficiency of homes and ensure these are listed on LIMs when homes are sold and on tenancy agreements when leased,
- j) Government agencies should benchmark the performance of the buildings they lease and own. This is happening with office buildings; it should be extended to non-office buildings. Those receiving GIDI funding should be asked to enter energy data before and after receiving the funding.

- k) Introduce subsidies for the use of certified low embodied carbon building materials, to make up for the lack of a price signal through the Emissions Trading Scheme (ETS).
- l) Incentivise lower carbon buildings and homes with marketing material, enabling listings of better performing homes on Land Information Memorandum (LIMs), reduced development contributions or faster building consent.
- m) Amend section 18 of the Building Act, to enable local authorities to set higher than code energy efficiency standards.

Ngā mihi nui,



Andrew Eagles
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New Zealand Green Building Council