

13<sup>th</sup> April 2022

Hon Megan Woods      Minister of Housing  
Hon Poto Williams     Minister of Building and Construction  
Hon James Shaw        Minister of Climate Change

Dear Ministers,

The New Zealand Green Building Council is concerned by MBIE consulting around delaying the implementation of the H1 improvements to insulation standards in the Building Code. In the middle of the climate crisis, and with cost of living a major issue, Aotearoa cannot afford to be making retrograde moves that would increase emissions and make homes more expensive to heat.

The New Zealand Green Building Council represents more than 540 companies and organisations, including property and construction companies, government departments, banks, energy companies, insurers, architects, developers, designers and tertiary education institutions.

The H1 improvements announced last year were already disappointingly minor at a time when other countries have already moved to a near zero energy standard for new buildings. To delay these improvements just means the country will continue to build below world class housing, which will need to be retrofitted at great cost in the years to come. The longer Aotearoa continues to build homes with poor energy efficiency, the greater the future carbon emissions that will be locked in.

Delaying these improvements would also undermine confidence in the Building for Climate Change programme, which is already progressing too slowly. The plan behind Building for Climate Change is to give the construction sector certainty over the coming decade and more as to what building standards will be. This would allow manufacturers to invest to meet those needs and allow builders to plan their practises to align with the coming standards.

If the Government were to suddenly put on ice even the moderate insulation improvements contained in the H1 changes, that would undermine the sector's confidence in the Government's commitment to lifting standards, and businesses would be less likely to make the necessary investments.

We have not seen any compelling evidence presented that would justify a delay in implementing H1. Master Builders has presented only anecdotal stories about builders being unsure and worried about the new rules. This is a reason to conduct an education campaign, not a reason to continue to build homes with outdated standards. We are also concerned that this move seems entirely driven by concerns of some builders, while the needs of home occupiers and the climate implications don't seem to be accounted for.

We strongly recommend against the Government adopting any recommendation to delay improvements to building standards.

We urge the Government to accelerate its work programme to set a pathway to a near zero energy building standard, and give the sector the confidence to plan for meeting that standard. The Government needs to keep on driving higher standards through the construction sector, leading to homes that use less energy, cause less emissions, and are cheaper to run. Our tamariki, our mokopuna, our whanau deserve nothing less.

Nga mihi nui,

A handwritten signature in black ink, appearing to read 'A. Eagles', is positioned above the printed name.

Andrew Eagles  
Chief Executive  
**New Zealand Green Building Council**  
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