

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:

Kathleen Bell

Email address:

kathleen.bell@nzgbc.org.nz

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 Green Building Council

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.

Research and Policy Advisor

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?

Our choice is based on two key principles: an adherence to science, and a desire to see New Zealanders thriving in warm, healthy homes. The science on climate change is clear: we must use all the levers possible as soon as possible to reduce the risks of global heating. Later is too late. As the IPCC, the leading group of climate scientists in the world, said earlier this year: 'It's now or never.' Extending the transition time is incompatible with the science. A delay would belch out hundreds of thousands of tonnes of global heating pollution, increasing the risks of floods and damaging storms to New Zealanders and our Pacific Island neighbours. Not only is a delay incompatible with the science, it is also incompatible with the view of the Climate Change Minister (<https://www.newsroom.co.nz/shaw-to-mbie-dont-delay-insulation-regulations>) and is not coherent with the Prime Minister's declaration of a climate change emergency.

Besides increasing climate change pollution, extending the transition period could see over 20,000 New Zealand households miss out on improved insulation, condemning them to colder homes, that are more difficult to heat, and saddling them with higher household energy bills.

Neither is the extension compatible with the feedback in the original consultation. As MBIE have said 'Over 98 per cent of responses supported increases over the status quo in the shortest time possible.'

(<https://www.rnz.co.nz/news/business/464659/building-industry-urges-delay-to-energy-efficiency-code>)

This implies that this current consultation is considering a proposal supported by less than two per cent of original respondents.

Furthermore, we have seen key industry bodies refute the arguments put forward by the delay lobby. For instance, a leading delay proponent has said that 'significantly scaling up the production of new materials required...is not possible', and a delay would 'allow current manufacturing methods to meet updated H1 requirements, especially for windows.' (<https://www.newsroom.co.nz/shaw-to-mbie-dont-delay-insulation-regulations>) However in their submission to this consultation the Window and Glass Association say this is not the case: 'High performance glass has been ordered, production is underway and shipping lines have been booked to ensure the original implementation plan could be achieved. Delaying the implementation is not an option for glass suppliers.'

Many builders, including volume home builders, are already building to higher standards such as improved insulation, showing that large parts of the sector are ready.

Whatever decision MBIE makes on the extension, we believe that it is important that certainty is provided

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around future building improvements, particularly the Building for Climate Change programme. When a decision is announced, we urge the Ministry to also make a statement confirming that no further delays to building improvements will occur, and that MBIE is committed to implementing such changes as soon as possible.

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.

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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)?