

# 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](mailto: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<br>(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](http://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?

NZCIC is a peak industry association representing around 35 member organisations involved in the delivery of our built environment. Our member associations cover all aspects of the construction industry including contractors, workforce, manufacturers and suppliers, design, research, and compliance. [nzcic membership](#)

All NZCIC members support the updates to H1 and recognise further improvement is needed in future. As we have a broad range of members with varying interests, there is a range of views on extending the transition of the H1 update, with some strongly opposed to an extension and some wanting more than six months. A majority of NZCIC membership support an extension of six months and believe this should be accompanied by a robust implementation strategy to provide resources and training to the sector to ensure a smooth roll out.

Meanwhile NZCIC encourages and supports those who are able to transition to standards in H1 Edition 5 or higher before May 2023.

NZCIC would like to work with MBIE to assist in the delivery of the implementation plan and ensure the timely and efficient delivery of information and resources to industry through our network of member associations.

**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.

NZCIC understands that extending the introduction of H1 changes means improvements to health benefits and operational carbon savings will be realised later as houses are able to be built to the current H1 requirements over the extended six month transition period, notwithstanding houses can also be built to the increased H1 Edition 5 standard during that time.

NZCIC is acutely aware that the construction industry is in a precarious position with significant headwinds from skills shortages, COVID disruptions, supply chain delays, cost escalations, rising interest rates and falling demand. These issues are causing unprecedented levels of stress on businesses and individuals within the industry, with serious implications for mental and physical health of our people. There are concerns that many cannot cope with additional change at this time.

## Transition period for the energy efficiency of housing

On balance a six month extension to the transition period is a reasonable compromise between climate change imperatives and industry wellbeing, with the proviso of implementation strategies being well resourced to support the sector through this and future transitions; and those who can make the transition sooner should be supported to do so.

## 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)?

NZCIC supports the following comprehensive implementation strategies to support the transition to the new standards:

- NZCIC encourages designers and specifiers to transition to the requirements of H1 Edition 5 as quickly as practicable and (in consultation with constructors and the supply chain) ahead of the proposed May 2023 deadline where possible.
- We encourage MBIE to investigate the circumstances (other than COVID related market conditions) which have been detrimental to a smooth and timely transition in order to ensure efficient transitions to higher standards in future.
- MBIE, in collaboration with industry, should provide practical resources and advice on how to comply with the new Standards, education via webinars and workshops, and education for clients to explain why these changes are needed.
- MBIE and BCAs should support those parts of the industry who have, or are able to transition before May 2023 to H1 Edition 5 standards or above.

*For example, the glass industry has undertaken forward orders for importation of high performing glass compliant to the new H1 standards. NZCIC would expect MBIE to support BCAs to provide straight forward substitution approvals of this higher specified glass via the minor amendment process on consents that may have been submitted under H1 Edition 4 standards.*

*This should also apply to other materials where a simple substitution will improve performance.*

NZCIC would like to partner with MBIE and work as a conduit to industry through our network of members and directly through our social media platforms. NZCIC has proven the effectiveness of such a partnership during the 2020 COVID lockdowns by keeping industry up to date and providing “one source of truth” to our member network and their networks.