

# 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:

Grant Price

Email address:

[office.nzstcf@gmail.com](mailto:office.nzstcf@gmail.com)

#### 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 Specialist Trade Contractors Federation (STCF)

#### 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.

Peak construction industry association

## 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?

Specialist Trade Contractors Federation (STCF) is the recognized voice of the specialist trades and subcontractors to the NZ construction industry. Specialist trades and subcontractors are responsible for carrying out approximately 80% of the construction work in New Zealand.

STCF supports the improvement to energy efficiency the changes to the H1 provisions in the Building Code will deliver.

The construction industry and specialist trades in particular are under unprecedented stress resulting from COVID restrictions and staff absence, price escalations, supply chain delays, labour and skills shortages and falling consumer confidence as a result of interest rate increases and uncertain housing market.

These market conditions have a profound impact on the financial and operational functions of businesses and put owners, management and staff under immense pressure with consequent problems with mental and physical health. The last two years have been arguably the most difficult conditions in living memory for small and medium businesses which make up the majority of specialist trades. Many businesses and individuals are not able to cope with additional change and resulting stress at this time.

Increasing the transition time by at least six months will help mitigate the additional stress placed on the sector, especially if support is provided by MBIE in the form of education and resources to implement the required changes. Those parts of the industry who are in a position to move ahead with changes, should be supported to do so.

**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.

## Transition period for the energy efficiency of housing

As described in answer 1, STCF is very concerned the construction industry is under unprecedented levels of stress and many businesses will not cope with additional change at this time. An extension of six months to the transition period will help, although some members believe a 12 month extension is needed.

STCF recognises there will be a reduction in operational carbon savings and health benefits delaying these improvements by six months, this will not be significant when considering the benefits to industry from a slightly longer transition.

## 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)?

We are aware that some parts of the supply chain, such as glass, have already moved to supply material to suit the higher requirements of H1. In cases where the supply chain has transitioned ahead of specifications (H1 4<sup>th</sup> edition to H1 5<sup>th</sup> edition) a material substitution approval may be needed under the Building Consent. In cases such as glass where these substitutions are simply changing to a higher quality material, MBIE should ensure that BCAs act expeditiously and treat these substitutions as an administrative change only.