

## **Consultation submission form** Building Code update 2021 Building Code operating protocols



MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT HĪKINA WHAKATUTUKI

New Zealand Government

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How to submit this form

## How to submit this form

This form is used to provide feedback on proposals found within the consultation documents:

> Building Code update 2021 – Issuing and amending acceptable solutions and verification methods

> Building Code operating protocols – Referencing standards and a tier framework to support standards in the Building Code system

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, Friday 28 May 2021 by:

> email: buildingfeedback@mbie.govt.nz, with subject line Building Code consultation 2021

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:	Nick Hill				
Email address:	Nick.Hill@boinz.org.nz				
<b>B.</b> Are you happy for MBIE to contact you if we have questions about your submission?					
🛛 Yes		□ No			
<b>C.</b> 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.					
Building Officials Institute of New Zealand (BOINZ)					
<b>).</b> The best way to describe your role is:					
□ Architect		$\Box$ Engineer (please specify below)			
□ BCA/Building Cons	ent Officer	Residential building owner			
Builder or tradespe	erson (please specify below)	$\Box$ Commercial building owner			
Building product manufacturer or supplier (please specify the type of product below)		⊠ Other (please specify below)			
$\Box$ Designer (please specify below)		Prefer not to say			
Please specify here.					

Chief Executive for the Peak body of Building Surveying in New Zealand of which 65% work in Building Control, who process building consents and undertake inspections.

Proposal 1: Energy efficiency for housing and small buildings

## Proposal 1. Energy efficiency for housing and small buildings

To make buildings warmer, drier, healthier and more energy efficient, we are considering options to increase the minimum insulation levels for roof, windows, walls and floors for new housing and small buildings. The options for minimum insulation levels vary across the country so that homes in the coldest parts of New Zealand will need more insulation than those in the warmest parts. As part of this, we are proposing to issue new editions of Acceptable Solution H1/AS1 and Verification Method H1/VM1 for housing and small buildings.

## Questions for the consultation

- 1-1. Which option do you prefer? (Please select one)
- 🗆 Status quo
- □ Option 1. Halfway to international standards
- ☑ Option 2. Comparable to international standards
- □ Option 3. Going further than international standards

#### Is there anything you would like to tell us about the reason(s) for your choice?

Our preferred option is option 2. We accept that this meets best practice but note that new building modelling has not been assessed against international standards. We are also concerned about the impact that this option will have on other Building Code clauses and urge MBIE to take a wider systems view to ensure that there is alignment overall.

We note that the structural design and construction of houses is currently based on NZS 3604. This predominantly uses 94mm wide timber framing for all the country. The proposed options 1 to 3, except for climate zone 1 in option 1, will require at least 140mm framing and new construction for R values greater than R3.2.

Requiring wider timber framing will add complexity, more work, and more cost for designers, MMC, and prefabricators. We note this will be contrary to the objectives of the Government of simplification and standardisation and make it more difficult to reduce building costs and produce more affordable housing.

The industry currently is not prepared for this level of complexity and the proposals do not include the plan to upskill the industry. Without such a plan we envisage that there will be a number of unjustified alternative solutions developed for BCAs to consider as part of the consenting process. This may lead to greater inconsistency and a slowing down of the consenting process, thereby increasing costs.

It is likely that the initial costs associated with implementing the new AS/VM will need to be ameliorated by designers (although the costs will reduce over time as the changes get bedded in). There is a need to ensure that early adopters are not put off by the potential initial costs.

We also note that the changed installation requirements would benefit from aligning the objectives of the climate change program with the broader building design aspects.

### **Proposal 1: Energy efficiency for housing and small buildings**



**1-2.** For your preferred option, how quickly should this change come into effect? (Please select one)

🗆 24 months

oxtimes 36 months or more

 $\Box$  Not sure/No preference

Is there anything you would like to tell us about the reason(s) for your choice?

We agree that at least 36 months will be needed to inform and train the industry.

As noted earlier, the changes will need to be viewed from a wider system change perspective. For example, the new product regulations, currently being developed and consulted, are likely to impact on the implementation of these energy efficiency changes. These sorts of linkages will need to be factored in.

### Proposal 1: Energy efficiency for housing and small buildings

**1-3.** If there are factors we should consider to progressively phase in your preferred option, please tell us below.

These factors may include material availability or affordability, regional differences in the requirements, different building typologies or other considerations.

BOINZ is the lead organisation involved in the training and educating of building control officers. The creation of 6 climate zones, which will require different construction design and detailing in each zone, will require a revision and updating of all training materials. Early education of both our sector and support for other industry sectors along with consumer understanding will be vital for a smooth transition.

Is MBIE proposing to publish Acceptable Solutions and Verification Methods to cover the additional complexity? Will this be left to the Standards process?

With NZS 3604 being revised, has this complexity been included in the revision scope? If not, it should be so that there is some alignment.

The building industry, with skilled labour shortages and material shortages, is facing unprecedented demand for affordable housing. Is it wise to impose a major change and cost on the industry at this time? This will need to be taken into consideration regarding the timing and transition to the preferred option.

What are the unintended consequences of the changes? For example, will additional mechanical ventilation be required because people will not open windows (even in summer for cooling)? If multiple layers of insulation are used, could moisture be trapped within the insulation?

Acceptable Solutions and Verification Methods to comply with H1 Energy Efficiency should be published together in one document. The sector reacted adversely to the 2012 Fire document changes because 7 acceptable solutions were published as separate documents, causing MBIE extensive work to research and republish the ASs together.

#### **1-4.** Do you support issuing the new editions of H1/AS1 and H1/VM1 as proposed?

H1/AS1: 🖂 Yes, I support it

 $\Box$  No, I don't support it

□ Not sure/no preference

H1/VM1: 🛛 Yes, I support it

□ No, I don't support it

Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

BOINZ accepts the need for New Zealand to meet its climate change responsibilities, however, it gives conditional support to the new editions. Our support is conditional because we are concerned about the flow-on impact on compliance with other Building Code clauses. For example, they will need to take into account:

- that increasing the insulation requirements may well affect the cavity construction for weathertightness, particularly for the higher insulation requirements, and
- additional requirements for roof spaces, under metal roofs, may well require more ventilation.

We question why there is no proposal to change to the BPI number in Code clause H1.3.2E relating to the higher levels of insulation being proposed by the 3 Options under consideration.

Is the BPI seen as an appropriate measure for energy efficiency because according to the definition it does not measure cooling energy used?

Building Code clause H1 Energy Efficiency proposal is currently contradictory and will need to be consistent. It should align the use of BPI with H1.3.1 [See H1/VM1 1.1.3.3, Comment 1].

### **Proposal 1: Energy efficiency for housing and small buildings**

We believe that the Comment to H1/AS1 2.1.1.1 is unnecessary as the increase in insulation should be enough for moisture control.

**1-5.** What impacts would you expect on you or your business from the proposed options? These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

BOINZ is involved in training and educating building control officers. The creation of 6 climate zones, which will require different construction design and detailing in each zone, will require a revision and updating of all training materials, not just for our members but also for other industry professionals.

BOINZ is happy to work with other groups to develop appropriate training to ensure that there is a smooth transition to the preferred option.

We also expect there will be impacts for some manufacturers and product suppliers to invest in new production equipment (e.g. window fabricators) as well as a need for reviews and appropriate changes to relevant technical literature.

## **1-6.** Is there any support that you or your business would need to implement the proposed changes if introduced?

🛛 Yes

🗆 No

□ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

BOINZ and the industry will need to understand the implications of complying with energy efficiency in relation to other related Building Code clauses, such as structure (B1), weathertightness (E2), internal moisture control (E3), and ventilation (G4), both for design and construction of buildings, and for education and training of BCOs, building professionals and trades people.

We reiterate that BOINZ is happy to work with other groups to develop appropriate training to ensure that there is a smooth transition to the preferred option.

**Proposal 2: Energy efficiency for large buildings** 

## Proposal 2. Energy efficiency for large buildings

To make buildings warmer, drier, healthier and more energy efficient, we are proposing to increase the minimum insulation levels for roof, windows, walls and floors for large buildings. The proposed minimum insulation levels will vary so that buildings in the coldest parts of New Zealand will need more insulation than those in the warmest parts. As part of this, we are proposing to issue a new Acceptable Solution H1/AS2 and Verification Method H1/VM2 for large buildings.

## Questions for the consultation

2-1. Which option do you prefer? (Please select one)

🗆 Status quo

 $\Box$  Option 1. 10% reduction in energy use for heating and cooling

 $\square$  Option 2. 20% reduction in energy use for heating and cooling

 $\Box$  Option 3. 25% reduction in energy use for heating and cooling Is there anything you would like to tell us about the reason(s) for your choice?

We have chosen not to opt for a single option for the reasons below.

Our comments below are based the premise that commercial buildings primary function is of an economic nature (productivity) delivering a return on investment which is different from the health and wellbeing outcomes desired for residential buildings.

It our assessment from the information provided, that a single % option solution across roof, windows, walls, and underfloor insulation requirements, in terms of meeting international standards, is not feasible.

We propose different options for different parts of construction.

For roof and underfloor insulation Option 2 is sensible and economic in respect of international comparison, delivering reduction on energy use and achieving significant changes from the 1996 levels.

For windows and wall insulation Options 3 delivers better alignment with international regulation while also significantly delivering on energy reduction.

**2-2.** For your preferred option, how quickly should this change come into effect? (Please select one)

 $\Box$  12 months

 $\Box$  24 months

 $\boxtimes$  36 months or more

□ No preference

Is there anything you would like to tell us about the reason(s) for your choice?

### **Proposal 2: Energy efficiency for large buildings**

Large buildings have long concept, planning and design phases, therefore consideration needs to be given to having a much longer transition period before the existing provisions cease. We believe that this is the case for each of the proposed options, to avoid imposing unnecessary costs in respect of redesign, procurement, and resulting delays. It also provides appropriate time frames for the development of educational and training products in an environment where skill and capability capacity is scarce.

Our suggestion as a minimum would be to extend the cessation date for each option by at least 18 months after the 36-month period.

**2-3.** If there are factors we should consider to progressively phase in your preferred option, please tell us below.

These factors may include material availability or affordability, regional differences in the requirements, different building typologies or other considerations.

**Education and Materials** 

The training of the sector and education of consumers will be an important consideration in the adjustment to the new requirements.

We are also concerned supply chains are not going to be able to cope with the delivery of potentially new thermally efficient materials in the quantity and the timeframes required to achieve the national outcome within date parameters.

We would therefore encourage a high level of engagement with the commercial building sector before final timing decisions are made to allow for design, procurement, and system changes.

#### 2-4. Do you support issuing the new editions of H1/AS2 and H1/VM2 as proposed?

H1/AS2: 🗌 Yes, I support it

🗆 No, I don't support it

Not sure/no preference

H1/VM2:	🗆 Yes, I	support it
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🗆 No, I don't support it

⊠ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

#### We would draw your attention to H1/VM2.

A specific comment on the proposed updated H1/VM2, Building Regulatory System (Page 2), references s19 of the Building Act, however, this reference does not include all options for complying with the Building Code because it does not cover alternative solutions. Is it MBIEs intention to preclude alternative solutions for energy efficiency, because BA04 s19 only covers solutions that a BCA must accept?

#### Note:

We believe a percentage reduction from a virtual building is a vague approach to setting insulation levels against performance criteria which is about providing adequate thermal resistance.

Expressed as percentage reduction it does not give any indication of the insulation required. It appears as this is a pseudo carbon reduction requirement disguised as energy efficiency, and therefore, we would encourage a more direct way of specifying what is required.

### **Proposal 2: Energy efficiency for large buildings**

**2-5.** What impacts would you expect on you or your business from the proposed options? These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

We are unsure how H1/AS2 modelling compliance will be demonstrated, and therefore, the ability of BCAs and their technical staff to efficiently process these calculations as part of the building consent application in a timely manner?

To our knowledge Architects do not issue producer statements, leaving the BCA to verify H1 compliance themselves, or ask for a peer review from the consent applicant at an additional cost and time implication.

## **Proposal 2: Energy efficiency for large buildings**

## **2-6.** Is there any support that you or your business would need to implement the proposed changes if introduced?

🛛 Yes

🗆 No

□ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

In order to keep BCAs trained to the current requirements MBIE will need to demonstrate how these provisions will be used and implemented. This will assist BOINZ in developing appropriate training material for BCOs (and other relevant stakeholders) that will deliver efficiencies in respect of the consenting and inspecting requirements and processes .

As with other proposals, BOINZ is happy to work with other groups to develop appropriate training to ensure that there is a smooth transition to the preferred option.

**Proposal 3: Energy efficiency for HVAC systems in commercial buildings** 

# Proposal 3. Energy efficiency for heating, ventilation, and air conditioning (HVAC) systems in commercial buildings

Currently, there is no acceptable solution or verification method issued for the energy efficiency of heating, ventilation and air conditioning (HVAC) systems in commercial buildings (Clause H1.3.6 of the Building Code). We are proposing to issue a new Verification Method H1/VM3 will establish a baseline and standardised procedures that will help building designers and building consent authorities demonstrate and verify the compliance of this clause.

## Questions for the consultation

**3-1.** Do you support issuing the new edition of H1/VM3 as proposed?

⊠ Yes, I support it □ No, I don't support it □ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

BOINZ support energy efficiency of HVAC systems and the existing information is out-of-date and needs clarity for design and compliance.

We would note, however, that the proposed H1/VM3 appears more like an acceptable solution because it states what to do rather than calculate a solution.

BOINZ suggest that consideration is given to amending Building Code clause H1.2(a) to include Communal Residential buildings and Assembly Care uses, because NZBC G5.3.1 requires heating for old people's homes and early childhood centres. This means that the heating in these buildings will need to be energy efficient.

We make this recommendation due to the growing number of these facilities across New Zealand.

**3-2.** Do you think the proposed Verification Method H1/VM3 covers all important aspects of energy efficiency of HVAC systems in commercial buildings?

🛛 Yes

🗆 No

 $\Box$  Not sure/no preference

If there are aspects that you think should be included, please tell us below.

Further to our comment above we note the abundance of detail and suggest this be changed to an Acceptable Solution.

**Proposal 3: Energy efficiency for HVAC systems in commercial buildings** 

**3-3.** What impacts would you expect on you or your business from the new H1/VM3? These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

BOINZ will have to revise its building surveying and BCA training programmes so that BCAs have trained staff to efficiently process building consent and inspections of buildings with HVAC systems.

In respect of the design specification, and HVAC sectors (installation and maintenance), we would expect to see increased costs due to increased sophistication of controls and plant; therefore, it would be sensible to promote the reasoning behind the change and offsets in respect of energy costs for occupants.

## **3-4.** Do you agree with the proposed transition time of 12 months for the new Verification Method H1/VM3 to take effect?

🛛 Yes, it is about right

□ No, it should be shorter (less than 12 months)

 $\Box$  Not sure/no preference

□ No, it should be longer (24 months or more)

Is there anything you would like to tell us about the reason(s) for your choice?

12 Months should provide enough time for changes to be communicated and implemented into new designs.

**Proposal 4: Natural light for higher-density housing** 

## Proposal 4. Natural light for higher-density housing

We are proposing to issue new acceptable solutions and verification methods for G7 Natural Light to adopt new compliance pathways for higher-density housing. The new pathways are more suitable for these types of buildings. As a consequence of the change, the scope of the existing documents are proposed to be limited.

## Questions

4-1. Do you support issuing the new G7/AS1, G7/AS2, G7/VM2 as proposed?

G7/AS1: 🛛 Yes, I support it

□ No, I don't support it

 $\Box$  Not sure/no preference

G7/AS2: 🛛 Yes, I support it

🗆 No, I don't support it

Not sure/no preferenceNot sure/no preference

G7/VM2:  $\boxtimes$  Yes, I support it  $\square$  No, I don't support it

Is there anything you would like to tell us about the reason(s) for your choice?

We note the increasing building consent applications for other than single storey stand-alone houses and therefore support extending this provision to multi-storey higher density housing.

## 4-2. What approach do you think we should take for G7/VM1?

 $oxed{i}$  It should be revoked

 $\Box$  It should remain as is

□ It should be amended

Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

**Proposal 4: Natural light for higher-density housing** 

**4-3.** What impacts would you expect on you or your business from the new editions of G7/AS1, G7/AS2, G7/VM1, and G7/VM2?

These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

We note that G7/VM1 will probably be revoked.

BOINZ will have to revise its building surveying and BCA training programmes to the new scope of G7 ASs and VMs so that BCAs have trained staff to efficiently process building consent and inspections of buildings for natural light.

## **4-4.** Do you agree with the proposed transition time of 12 months for the new G7/AS1, G7/AS2, G7/VM1, and G7/VM2 to take effect?

□ Yes, it is about right

 $\Box$  No, it should be shorter (less than 12 months)

 $\boxtimes$  No, it should be longer (24 months or more)  $\square$  Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

Buildings greater than 3 storeys high will need longer transition time given many will currently be in the design phase or about to commence construction. We would also make the comment that supply chain delays, as a result of Covid driven transport logistic issues, will impact on material availability and the length of the build over the next 2-3 years.

**Proposal 5: Weathertightness testing for higher-density housing** 

# Proposal 5. Weathertightness testing for higher-density housing

We are proposing to issue a new edition of E2/VM2 to reference BRANZ Evaluation Method EM7 Performance of mid-rise cladding systems (version 3, June 2020). This update version of EM7 is easier for test laboratories, cladding system suppliers, and building designers to use than the previous version. The new version does not significantly change the minimum performance requirements of the test method, and existing tested cladding systems will not need to be retested.

## **Questions for the consultation**

**5-1.** Do you support issuing the new edition of E2/VM2 as proposed to cite BRANZ EM7 version 3?

🛛 Yes, I support it 👘 🗌 No, I don't support it 👘

□ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

In principle BOINZ supports the issue of a new edition of E2/VM2 to reference the BRANZ Evaluation Method EM7 Performance of mid-rise cladding systems (version 3), June 2020. This is not our specialty area, but we recognise it is valuable to reference the latest versions for weathertightness testing.

We are also very mindful of past issues in respect of weathertightness, and expect the enhancements to the new test will better deliver product and system outcomes, as well as delivering risk reduction across specification and consenting.

## **5-2.** What impacts would you expect on you or your business from the new edition of E2/VM2?

These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

The right product with suitable testing makes for an efficient building control system, from design to CCC. We would expect to see outcomes of increased durability and reduced maintenance.

### **Proposal 5: Weathertightness testing for higher-density housing**

## **5-3.** Do you agree with the proposed transition time of 12 months for the new Verification Method E2/VM2 to take effect?

⊠ Yes, it is about right

□ No, it should be shorter (less than 12 months)

 $\Box$  No, it should be longer (24 months or more)

Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

BOINZ is unaware of the consequences of this transition time on industry and will support industry recommendations, particularly in respect of re-testing.

**Proposal 6: Standards for citation in B1 Structure** 

## Proposal 6. Standards referenced in B1 Structure

We are proposing to amend referenced standards in the acceptable solutions and verification methods for clause B1 Structure. The amended references include new versions of AS/NZS 4671, AS/NZS 5131, AS/NZS 2327, the NZGS document "Field Description of Soil and Rock – Guideline for the field descriptions of soils and rocks in engineering purposes". Previous versions of these documents are currently referenced by the acceptable solutions and verification methods.

## Questions for the consultation

**6-1.** Do you support the amendment of B1/AS1, B1/AS3 and B1/VM1 as proposed to include the following referenced standards and document?

AS/NZS 4671: 2019 Steel for the reinforcement of concrete:

AS/NZS 5131: 2016 Structural Steelwork – Fabrication and Erection:

AS/NZS 2327: 2017 Composite structures – Composite steel-concrete construction in buildings Amendment 1:

Field Description of Soil and Rock – Guideline for the field descriptions of soils and rocks in engineering purposes, New Zealand Geotechnical Society Inc., December 2005:

Is there anything you would like to tell us about the reason(s) for your choice?

BOINZ agrees to referencing up-to-date Standards and publications.

- ⊠ Yes, I support it
- □ No, I don't support it
- □ Not sure/no preference
- Yes, I support it
- 🗆 No, I don't support it
- □ Not sure/no preference
- 🛛 Yes, I support it
- 🗆 No, I don't support it
- $\Box$  Not sure/no preference
- 🛛 Yes, I support it
- □ No, I don't support it
- $\Box$  Not sure/no preference

### **Proposal 6: Standards for citation in B1 Structure**

**6-2.** What impacts would you expect on you or your business from the referencing of these standards and document?

These impacts may be economic/financial, environmental, health and wellbeing, or other areas.

BOINZ will have to update BCA training programmes so that BCAs will have staff that can efficiently process building consent and inspect a building's structural requirements.

Many firms have QA systems that require up-to-dates Standards and publications to be used.

## **6-3.** Do you agree with the proposed transition time of 12 months for the new Acceptable Solutions B1/AS1 and B1/AS3 and Verification Method B1/VM1 to take effect?

 $\boxtimes$  Yes, it is about right

 $\Box$  No, it should be shorter (less than 12 months)

□ Not sure/no preference

No, it should be longer (24 months or more)

Is there anything you would like to tell us about the reason(s) for your choice?

**Proposal 7: Editorial changes to Acceptable Solution B1/AS1** 

## **Proposal 7. Editorial changes to Acceptable Solution B1/AS1**

We are proposing to amend text within Acceptable Solution B1/AS1 to make editorial changes in regards to geotechnical requirements. Editorial changes may include obvious errors in the text, typos, spelling mistakes, incorrect cross-references, changes in the formatting, minor clarifications of text with minor to no impact, or other items related to current document drafting practices.

## Questions for the consultation

**7-1.** Do you support the amendment of B1/AS1 to address the editorial changes to geotechnical requirements as proposed?

⊠ Yes, I support it

□ No, I don't support it

□ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

**New look for Building Code documents** 

## **Building Code operating protocols**

We are seeking feedback on two draft operating protocols that are intended to provide transparency and certainty around the work MBIE does as the building and construction regulator. The two operating protocols for this consultation are:

> Referencing standards in the Building Code system

> Tier framework to support standards in the Building Code system

## Questions for the consultation

## **1.** Do you agree with the proposed criteria for referencing a standard in the Building Code system?

These proposed criteria include: alignment to the Building Code, in scope, clear, specific, implementable in New Zealand and available.

 □ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

BOINZ would like clarification on whether the protocol will apply to the support for development of new Standards. We do not see in the proposal a clear pathway for the entry process of new Standard to be developed for referencing the Acceptable Solutions and Verification Methods. The same would apply to documents prepared by other organisations for referencing in the same way.

#### 2. Do you agree with the proposed criteria for deciding the tier status of standards?

Risk severity:	$oxtimes$ Yes, I agree with the criteria $\Box$ No, I don't agree $\Box$ Not sure/no preference
Contribution to the Building Code:	$oxtimes$ Yes, I agree with the criteria $\Box$ No, I don't agree $\Box$ Not sure/no preference
Design focus:	⊠ Yes, I agree with the criteria □ No, I don't agree □ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

We note the work we have contributed to this development previously.

BOINZ recommends that a transparent review mechanism is included in the protocols to recognise that changing industry relevance may change the importance of a Standard and hence its tier level.

#### **New look for Building Code documents**

3. Which standard(s) and their proposed tier status particularly impact you and why?

NZS 3604 is the most used Standard by the industry, and it is most important that it is kept accurate and up to date.

Will an amendment update be proposed to NZS 3604 to facilitate the extra space required for the installation of the thicker insulation required by the H1 proposals?

**4.** Is there anything else you would like to tell us about these protocols for the use of standards in the Building Code system?

We are aware of a number of industry issues in regard to the development and maintenance of construction related standards in New Zealand over recent times. These include:

- A lack of a clear and transparent strategy in the overall development and maintenance of construction related Standards.
- The financial burden on industry associations. Many associations struggle to raise and commit the funds, and where they are unable to meet funding targets, the risks are two-fold:
  - Joint AS/NZS Standards risk being de-joined delivering serious impacts for New Zealand should MBIE not support shortfalls in funding critically needed industry Standards.
  - Specific sector Standards which are a departure from normal building protocols, may disadvantage solutions to wider building construction issues, such as Climate Change targets and housing affordability. In situations like this, MBIE needs to take a broader funding approach to some Standards.
- The use of the building levy in Standards development, has not been transparent. A clear annualised Standards development and maintenance allocation with forward 5 year planning forecasts would assist industry in terms of its support commitments.
- Similarly, while the tiered system does bring a level of Standards importance transparency, BOINZ would encourage greater clarity in respect of the overall funding cycles, particularly in relation to Tier 1.
- While not documented, industry is aware of communication and relationships issues between Standards Australia and MBIE, particularly since the incorporation of Standards New Zealand into MBIE. This has not benefited industry groups across the two countries, in respect of joint Standard development.

**New look for Building Code documents** 

## New look for Building Code documents

**1.** Is there anything you would like to tell us about the new look of acceptable solution and verification methods?

#### The look is great.

Separate Acceptable Solutions and Verification Methods are a needless complication. Keep the solutions by Building Code clause, or building type, such as backcountry huts.

Feedback for the 2012 Protection from Fire acceptable solutions was that they should be in one publication, which has taken considerable time and energy for MBIE to produce.

### Thank you

## Thank you

Thanks for your feedback, we really appreciate your insight because it helps us keep pace with modern construction methods, the needs of New Zealanders and ensure buildings are safe, warm, dry, healthy and durable.

To help us continue to improve our Building Code update programme, we would appreciate any suggestions or comments you may have on what's working and how we can do better.

Please leave your feedback below: