

Building System Performance  
Ministry of Business, Innovation and Employment  
PO Box 1473  
Wellington 6140

31<sup>st</sup> May 2022

RE: Building Code consultation 2022 – Transition Period for the Energy Efficiency of Housing

Community Housing Aotearoa-Ngā Wharerau o Aotearoa (CHA) is an Incorporated Society and a peak body for the community housing sector. In order to achieve our vision of ‘all New Zealanders well-housed’, we have a strategic focus on supporting a well-functioning housing system and working toward the realisation of the right to housing. We are also mindful of the larger institutional and regulatory settings within which our members and other community organisations operate. We are keen to ensure these settings support the delivery of homes affordable to households of varying income levels.

Our 75 provider members provide homes for nearly 30,000 kiwis nationally across 18,520 homes, and our 30 partner members include developers, consultants, and local councils. Community Housing Providers (CHPs) are primarily not for dividend entities that develop, own, and manage social and affordable housing stock, with rental and progressive homeownership tenure offerings. We work closely with Te Matapihi, which represents Iwi-based and Māori community housing providers. More about us can be found [here](#).

CHA thanks the Ministry of Business, Innovation and Employment for the opportunity to submit on the 2022 Consultation Document titled “Transition Period for the Energy Efficiency of Housing” referred to here simply as the “Consultation Document”.

The remainder of this submission will address the “Question for the Consultation” as included in page 16 of the Consultation Document.

*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?*

CHA disagrees with the proposed extension to the transition time for the implementation of the new insulation settings. Increasing the energy efficiency of our homes is of paramount importance and should not be delayed. The supply of warm, dry, and efficient homes are pivotal for meeting our environmental and social obligations. Our homes have become our silent public health emergency, underpinning the pandemic, and it is urgent that we act to change this.

We endorse the letter of the NZ Green Building Council dated 13th April 2022 and lend our support to the collective voice urging the government to remain steadfast to its intended timeline for the H1 improvements.

*1-2 What impacts would you expect for 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.*

CHA approaches this question not as a business, but as a sector body for community housing providers and an actor in the housing system. Our concerns pertain to the environmental and social impacts which the delayed roll-out of the higher insulation standards would likely incur. As assessed in 1.4.3 of the Consultation Document, delaying the implementation of the higher insulation settings by 6 months will generate approximately 203,000 tonnes of avoidable carbon dioxide emissions, an outcome which is antithetical to our environmental commitments and obligations. Allowing a 6-month delay in the implementation of the insulation standards may see 23,500 homes built to a lower insulation quality, unnecessarily jeopardizing the habitability and health of the homes. This could be thought of as legislative retrogression for the ability of those homeowners to realize their human right to an adequate home.

**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)

We have frequently heard from our members that webinars and other avenues for engagement with Ministry representatives are important opportunities to gain insight into how policies can be applied in practice. Educational materials would also be beneficial resources as CHPs interact with builders, designers, and architects.

Ngā mihi,

Vic Crockford, CEO, Community Housing Aotearoa – Ngā Wharerau o Aotearoa

