

Consultation submission form

Building Code update 2021

Building Code operating protocols



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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:

Rob Campion

Email address:

robert.campion@wganzt.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.

Technical Manager

Window & Glass Association NZ

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.

Providing technical support to the window and glass industries in NZ

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?

The Association is wholly supportive of change in this area and actively rejects Option 1, believing that not only can the industry do much better, but the NZ homeowner certainly deserves better.

We have selected Option 2 as an agreed alignment with international Standards and as a first step toward a better built environment.

We believe that ultimately something resembling the proposed Option 3, might form a part of the NZ Building Code in the future but believe that during the transition of Option 2, a better understanding of the needs of the NZ home will develop and that Option 3 of the future, rather than having a focus on R values, will represent a clearer view of the thermal demands of a more efficient and healthier home. We look forward to assisting in this development...

Please Note - Our comments are a response to the values and tables proposed for windows only! Whilst beyond our mandate, it appears that other building elements might need to move to different Options to those proposed above, in order to maintain a similar alignment with international Standards.

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)

- 12 months
 24 months
 36 months or more
 Not sure/No preference

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

The simple answer for the window and glass industry is that 24 months will be required to transition the whole of the Country to Option 2 as proposed.

This response is based primarily on strengthening supply networks to cope with an increased use of thermally-broken aluminium frames across the Country.

That said, based on the adoption of Option 2, it might be possible to work with a staged transition along the lines of,

- a) Option 2 in 12 months in Climate zones 1 & 2
- b) Option 2 in 24 months in Climate zones 3, 4, 5, & 6

That said, the implementation of a staged proposal could be problematic for some...

Comment - As noted above we see Option 2 as a first step toward even better performance, similar to that proposed in Option 3, and we believe it possible to transition to a better-informed Option 3 by 2030. Again, we look forward to working with MBIE on such a proposal...

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.

The Association is proposing that we accept the Option 2 values and tables provided in the Consultation document for windows, and that there is a transition period of 24 months.

Given that the most common way to achieve Option 2 will be through the use of thermally-broken aluminium frames with clear/Low E double glazing. The factors contributing to the phase in of these products are as follows,

- a) The major driver is the supply network for thermally-broken frames. Whilst most existing aluminium window manufacturers have a thermally-broken frame option available the volumes in most parts of the Country are currently very small. From less than 10% in the north, increasing as you move south to maybe 50% in the proposed Climate zone 6. To cope with the increased demand machinery will need to be purchased and, in some cases, land procured and buildings constructed to house the new machinery and operations.
- b) To a lesser extent the increased supply of Low E glass will present similar issues. Glass suppliers will have to reduce their stocks of clear glass and increase the stocks of Low E. Whilst it may be only a matter of months to modify stock levels what is not considered is,
 - i) that multiple variants of Low E glass may need to be held to satisfy cost effective demands of each of the Climate zones, and
 - ii) that the processing of Low E glass is slower (as much as 25% in some cases) than conventional clear glass due to issues with furnacing the glass during the toughening process. Because the operation is slower more space may be required to meet demand.
 - iii) Low E glass requires more care in handling and quality inspection and in many cases additional cutting time/processes to ensure a good quality product is delivered.

Proposal 1: Energy efficiency for housing and small buildings

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

H1/AS1: Yes, I support it 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?

The Association supports the proposed H1/AS1 in principle, **but** believe the following modifications need to be made.

- a) We are happy with the new scope,
- b) We are happy with the move to six Climate zones,
- c) We believe that our WEERS (Window Energy Efficiency Rating System) procedure is a useful tool for demonstrating Compliance with H1.3.1 for windows and doors, especially post production. Values can be selected from the proposed schedule tables, informing a suitable frame and glass type for the purposes of consent, and post production the WEERS report can be used to confirm that the product installed into the building does indeed meet the required performance criteria. The WEERS procedure was co-developed between WANZ, BRANZ, EECA, & the DBH and users must have their system outputs verified for accuracy by BRANZ, prior to implementation, thus delivering results that can be used with confidence.
- d) There are some fundamental issues in the way that windows are being considered in the consultation document regarding the calculation of R values, per D.1.2, for the schedule tables referred to in D.1.3, which must be addressed, as follows,
 - i) The only real option is to replace the proposed tables completely!
 WGANZ has been doing a significant amount of work with MBIE and BRANZ on a new series of tables to replace the very old ones published in the Consultation document and believe these must be included in Clause H1 as a part of the revision. The proposed tables base the required R values for windows on the weighted average of a typical house/lot of joinery, including a range of product types, windows of varying sizes, and hinged and sliding doors, all of which have different frame to glass ratios and therefore differing performance values.
 The weighted average method has been proven to deliver a much more accurate picture of the windows and doors as a part of the overall building envelope, providing a better balanced and more accurate response than the method currently written into the Consultation document.
 - ii) If process does not allow for the replacement of the current (obsolete) tables at this time, then we would ask that they be withdrawn from the document and a guidance document is delivered in association with Clause H1 that includes the weighted average tables and a commentary to their use.
 - iii) If process does not allow for the removal of these tables, then they must be reviewed and updated as below.
- e) Appendix D.
 - i) Comment 3 under D.1.1.1 says, "If the SHGC is below 0.69, the solar heat captured in winter may fall below an acceptable level and this should be considered in design." Given that Low E IGUs typically have SHGC values lower than 0.69 (so all windows moving

Proposal 1: Energy efficiency for housing and small buildings

forward), we believe this statement needs to be revised or removed. Absolutely SHGC should be considered in design but in terms of building location and orientation, rather than a maximum value.

- ii) D.1.2. refers to the R_{window} value being based on a typical 1500h x 1800w window. As noted above this is a 20+ year old average window size and is no longer applicable to the industry and construction as it is today. We recognise that it may be too late to replace the methodology and the tables it is used to populate but believe moving forward the tables and the Schedule Method should be revised based on the weighted average of a typical houselot of windows and doors. In the meantime, as raised previously, in order that the 1500h x 1800w typical window values make sense in the document the term 'minimum construction R value' must be removed.
The reference in Comment 1 to single glazing should be removed.
- iii) D.1.3. refers to the very old performance and obsolete tables from NZS4218 and like the typical window must be replaced. Again, we recognise it may be too late to do that for this release of H1/AS1, but if the above-mentioned proposal cannot be implemented in time, then the tables (D.1.3.1A – D) must be modified as follows,
- Remove all references to Single Glass (for aluminium Codes 101-109)
 - Remove all Brand name products (for aluminium Codes 117, 118, 122, 124, 126)
 - Remove Note 1 referring to single glass
 - The term Low E in these tables and their associated values are misleading. At the time the tables were written this referred to a 'hard coat' Low E. Today's market has a range of Low E products and combinations available, and the hard coat is perhaps the lowest performing of them all.
 - A line needs to be added into the table to include a Low E product with a U_{cog} of approx. 1.2 and the associated data added to suit.
 - A reference note or comment needs to be included regarding the use and selection of Low E glass.
- f) Use of the term 'Minimum construction R value' is ambiguous and incorrect when related to the required performance of windows. It is only used in Paragraphs 2.1.1.1, 2.1.1.3, & 2.1.2.2 and in the title of Tables 2.1.2.2A and 2.1.2.2B. The word **'Minimum' must be removed**.
The term is ambiguous as it relates to the Schedule Method because the values used in the schedule tables are based on a typical window 1500h x 1800w. Should a smaller window be used in the building then a different frame and glazing type may be required to satisfy the performance values for the zone. The typical window was deemed to be the average of a houselot of windows, albeit from more than two decades ago. Expecting all windows in the building to comply with a value based on a single window size is nonsensical, hence our insistence that the weighted average method be introduced.
- g) Table 2.1.2.2B includes Skylights as a building element but does not include a construction R value for them in Table 1.4, or parameters around their size. This will need to be addressed.
- h) Section 2.3 Solar heat gains. 2.3.1.1 does not adequately cover this subject and needs to be reviewed. The current statement is misleading and potentially inaccurate.
- i) Throughout the document there are many references to specific window and glass products, which we believe is misleading. Using terms like thermally broken and triple glazing throughout the document delivers an expectation that may be unwarranted, unnecessary, and unwelcomed. We saw something like this with the 2008 update to H1, where many understood that based on the commentary wording, that double glazing was mandatory in all climate zones. WGANZ believe that Clause H1 should refer only to performance requirements and leave it to the market to find appropriate and cost competitive combinations to satisfy those requirements.
The proposed replacement tables referred to above, include combinations of frame materials, and both double and triple glazing combination options that will satisfy all proposed performance requirements, giving building designers the freedom of choice that they traditionally look for.

Proposal 1: Energy efficiency for housing and small buildings

- j) One issue that the wider industry will face with the proposed changes is that of proving compliance once the building work has been completed and before a CCC can be issued. With increased requirements and cost comes an increased risk of product substitution and issues with conformity. Some structure around the support of the issue would be beneficial:
- All products should be independently certified for performance.
 - Independent verification that what is consented has been provided.
 - Our Associations WEERS programme is one tool for achieving these, as discussed above.
- k) Another of the things not well discussed in the Consultation document is the cost and expected longevity of triple glazing.
- One example of cost is that to achieve an R value of 0.62 as proposed for Zone 6, a thermally broken aluminium frame with a performance Low E double glazed IGU, would cost approx. \$630/m², whereas a thermally broken aluminium frame with a Low E triple glazed IGU, would cost approx. \$1020/m², and a uPVC frame with a performance Low E double glazed IGU, would cost about the same as the thermally broken window.

As with all comments, WGANZ would be more than happy to continue assisting MBIE in this area...

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.

Whilst this question is not directly applicable to the Association, an expressed area of concern is the lack of comment/feedback opportunity relating to impacts on housing affordability. The proposed changes will certainly see us moving toward better performing and more comfortable houses, but if that drives the cost of new homes further beyond the reach of the average Kiwi, it is debatable that comparing our housing performance to international Standards alone, without looking beyond the 'R' values, is a good decision...

We are uncertain how the Government feels, but there is argument that says the use of hydro-electric energy to heat and cool a modestly efficient home, does not seem to be a bad option when compared to unaffordable housing...

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?

Not applicable to the Association?

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
- Option 1. 10% reduction in energy use for heating and cooling
- Option 2. 20% reduction in energy use for heating and cooling
- 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?

Our preference here was between retaining the status quo and choosing Option 1 for windows. The issue is that the range of buildings and the types of glazing used in them varies so greatly that trying to establish a minimum performance level, based on R value alone, is too complex and leads to misinformed decisions.

We believe H1/AS2 needs more consideration when it comes to setting the thermal performance of buildings other than housing. The minimum R values need to be based or informed by the occupancy and/or function of the building. Schools, hospitals, aged care facilities, hotels, should be considered in much the same way as housing excepting that even in this group the occupancy periods vary.

Offices are dependent on overall building construction. The windows used in an office block will need to perform differently to those in a high rise with a glazed façade, and differently again to a high rise with say concrete spandrels...

Curtain wall / glazed facades need to be considered as an average over the floor and/or entire building as the performance of a spandrel panel compared with a vision panel will be completely different.

We believe there is no one size fits all solution in this category, which is most large buildings have the thermal envelope designed specifically for the building, its situation, and its occupancy.

Thus Option 1 has been selected as a first step toward a better considered model moving forward, as doing something is better than doing nothing at all.

Proposal 2: Energy efficiency for large buildings

2-2. For your preferred option, how quickly should this change come into effect?

(Please select one)

- 12 months

 24 months

 36 months or more

 No preference

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

We would be happy for H1/AS2 as written, based on Option 1 for windows, to have a 24 month transition period, allowing time for a more structured approach to be developed and implemented.

Again, we would be more than happy to work with MBIE to help develop a better solution...

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.

As above...

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 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?

The Association supports the proposed H1/AS2 in principle **but** believe that modifications need to be made.

- a) As noted above in 2.1 H1/AS2 needs to be reshaped to be based on the building's occupancy.
- b) Per 1.4 above the window tables need to be modified to remove some glass types. For H1/AS2 the single glazed options can remain as these may still apply to shopfronts and partitioning etc...
- c) The 1500h x 1800w really does not apply in many cases for this Acceptable Solution, highlighting the need to consider buildings by occupancy and overall design.

Try applying this rationale to a glazed façade...

Do the windows and doors used in the reference building (in H1/VM2) adequately reflect typical situations?

Again, this needs to be categorised by occupancy type...

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.

Not applicable to the Association?

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?

Not applicable to the Association?

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?

Not applicable to the Association?

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 Not sure/no preference

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

Not applicable to the Association?

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.

Not applicable to the Association?

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)
 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?

Not applicable to the Association?

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: <input checked="" type="checkbox"/> Yes, I support it | <input type="checkbox"/> No, I don't support it | <input type="checkbox"/> Not sure/no preference |
| G7/AS2: <input checked="" type="checkbox"/> Yes, I support it | <input type="checkbox"/> No, I don't support it | <input type="checkbox"/> Not sure/no preference |
| G7/VM2: <input checked="" type="checkbox"/> Yes, I support it | <input type="checkbox"/> No, I don't support it | <input type="checkbox"/> Not sure/no preference |

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

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

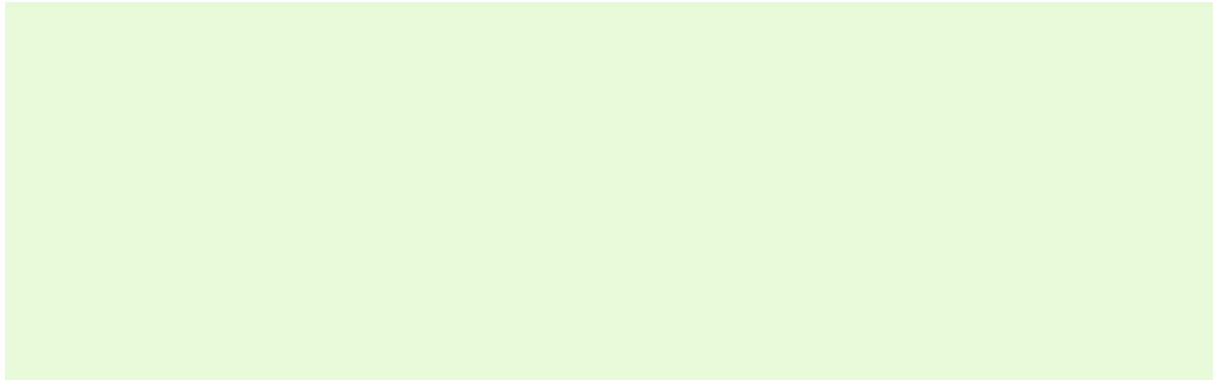
- | | |
|---|--|
| <input type="checkbox"/> It should be revoked | <input type="checkbox"/> It should remain as is |
| <input type="checkbox"/> It should be amended | <input checked="" type="checkbox"/> Not sure/no preference |

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?

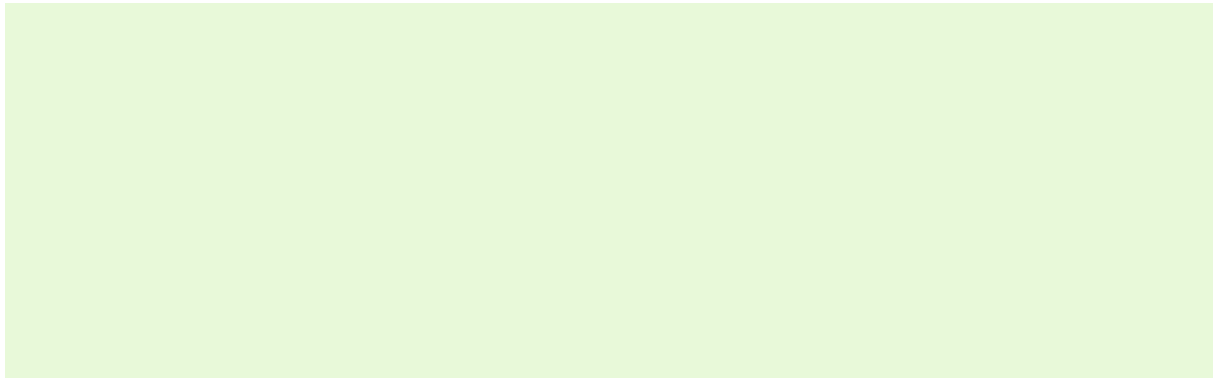
These impacts may be economic/financial, environmental, health and wellbeing, or other areas.



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



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?

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.

In terms of E2/VM2, NZS4223 Part 4, will require an update and alignment with the proposed revision of wind pressures within NZS3604, in order to provide an economical and repeatable solution for medium rise buildings at 10-25m in height. Without an appropriate alignment, recognising that NZS3604 is a long term project, there is a potential and perhaps critical impact to compliance with Clause B1 for building designers and the window and glass industries.

Where are details that satisfy the requirements of E2/VM2 to be listed/shown within the Building Code?

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)
- 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?

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:

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

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

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

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

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

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:

- 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?

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.

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?

- Yes, it is about right
- No, it should be shorter (less than 12 months)
- 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?

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?

Building Code operating protocols

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.

Yes, I support them No, I don't support them Not sure/no preference

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

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

Risk severity: Yes, I agree with the criteria No, I don't agree Not sure/no preference

Contribution to the Building Code: Yes, I agree with the criteria No, I don't agree 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?

Whilst our Association agrees in principle with the tiered structure, it raises the question of funding. What happens if an industry is unable to raise the funds to review a tier 2 or 3 Standard? Does the Standard remain unchanged or is it withdrawn?

And a slightly more cynical question, what if a supplier with a particular bias were to fund the changes to a tier 2 or 3 Standard and skew an industry in a particular way. How would this situation be dealt with?

Building Code operating protocols**3. Which standard(s) and their proposed tier status particularly impact you and why?**

We believe that NZS4223 Parts 2, 3, and 4 should move from Tier Two to Tier One. Table A.2 underestimates the impact of these Standards on Code compliance and their contribution to the design of a building.

As noted previously, in terms of NZS4223 Part 4, this Standard will require an urgent update and alignment with the proposed revision of wind pressures within NZS3604, in order to provide an economical and repeatable solution for medium rise buildings 10-25m per E2/VM2. Without an appropriate alignment, recognising that NZS3604 is a long term project, there is a potential and perhaps critical impact to compliance with B1 for designers and the window and glass industries if it remains at tier three.

As commented above, if industry is unable to finance this important update, designers and industry will be without an economical & repeatable means of compliance with upcoming changes.

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

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 new look documents certainly appear to be easier to read and follow... We approve.

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:

