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13 June 2022

BRANZ submission on Building Code update 2022: Transition period for the energy efficiency of housing

SUBMITTER INFORMATION

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I am happy for MBIE to contact me if they have questions about this submission.

I am making this submission on behalf of BRANZ.

I am happy for this submission to be uploaded onto MBIE's website.

ABOUT BRANZ

BRANZ[1], is a multi-faceted, science-led organisation. We use independent research, systems knowledge, and our broad networks to identify practical solutions that improve Aotearoa New Zealand's building system performance. BRANZ is driven by the knowledge that to thrive as a society, New Zealanders need a built environment that is safe, healthy and performs well. Our vision is to *Challenge Aotearoa New Zealand to create a building system that delivers better outcomes for all.*

To do this, BRANZ cultivates strong relationships with industry, government and building users through collaboration and facilitating the sharing of insights, opportunities and ideas. These relationships underpin the range and depth of BRANZ's knowledge and ability to understand the linkages and interactions that influence the building system.

BRANZ undertakes and commissions research, funded by the Building Research Levy, which is both practical and drives positive building and construction system change.

This work helps improve industry practices around the performance of buildings and how we use them, through to informing policy and legislation and all points in between.

BRANZ also contributes to practical improvements in Aotearoa New Zealand's built environment through a suite of independent product testing, assurance and consultancy services. Evidence-based advice is available at all phases of the product life cycle from preliminary R&D and standards compliance, through to verifying end-use product performance. A BRANZ assessment

[1] https://www.branz.co.nz/

is universally trusted, providing assurance that the products should do what the manufacturer says they will do. We hold the responsibility to ensure our work is of the highest standard at the core of what we do.

BRANZ response to the proposal to extend the transition period for adopting new insulation requirements for housing in Acceptable Solution H1/AS1 and Verification Method H1/VM1 (H1) to 1 May 2023.

We have chosen not to respond directly to the questions asked in the Consultation submission form. This is because the questions are appropriately directed at those directly working within the industry who are needing to prepare for the transitions associated with the H1 changes.

Instead, we provide a brief perspective from our place in the building system as described in the background section above.

Implications of delaying transition until May 2023

BRANZ supports the changes to the 5th edition of the Building Code's H1 Energy Efficiency clause as a welcome first step towards achieving higher building performance standards in Aotearoa New Zealand.

Buildings that are healthier, warmer and drier have positive health and wellbeing outcomes for their occupants. They are also less costly to run and have fewer carbon emissions over the course of their lifetime.

We believe that better performing buildings are in everyone's best interest – individually, as a society and for the environment. The sooner we can embrace transition-oriented actions, the better the future will look.

It is our view that the transition shouldn't be delayed unless there is compelling evidence that demonstrates the sector is facing significant barriers to meeting the current transition timeframe. BRANZ does not have information or evidence that is able to assist with an assessment of the industry's capability to meet the transmission period. We commend the MBIE for seeking such evidence from the sector through this submission process.

We note that much can be achieved to begin the transitions towards energy efficiency now, whether regulation is in place or not.

Support for the industry to implement changes

BRANZ is committed to supporting the sector to transition to more energy efficient buildings. We continue to focus our effort on this outcome, regardless of when the changes come into effect. We welcome feedback from MBIE and the industry on what more we can do to support the transition. We are keen to understand whether there are any knowledge gaps that need additional research and what additional information and resources can be provided. A list of resources currently available or in development is provided for your information in Appendix One.

Should there be gaps identified from submitters in response to Questions 1-3 in the consultation, we welcome a discussion with MBIE on what BRANZ can do to support the industry through the levers we have available.

FURTHER INFORMATION

If you have any questions about this submission or wish to seek further advice, please do not hesitate to get in touch with BRANZ.

APPENDIX ONE – BRANZ RESOURCES

Articles related to H1 changes have appeared in recent issues of BUILD magazine:

- Solar heat gain coefficient for windows (April 2022)
- Updating BRANZ House insulation guide (April 2022)
- H1 changes within bigger picture – First step in building for climate change (February 2022)
- Overview of changes – Building Code changes 2021 (February 2022)
- Summary of BRANZ's response to the H1 proposal – BRANZ on H1 proposal (April 2021)
- MBIE wants input on insulation increases (April 2021)

BRANZ has released the following Bulletins relating to the new H1 requirements and higher performance buildings - available free with a login from the BRANZ website:

- Bulletin 672 Specifying floors under H1
- Bulletin 670 Specifying windows and doors under H1
- Bulletin 668 Complying with H1 – Housing and buildings up to 300 m^2
- Bulletin 661 Residential roofs with high thermal performance
- Bulletin 660 Residential walls with high thermal performance

Other recent related work supported by BRANZ includes:

- Collaboration with Passive House Institute New Zealand on a handbook on High Performance Construction Details
- The Thermal bridging calculation tool
- A webinar on Thermal Bridging in timber-framed walls
- Up-Spec tool on Specifying higher-performing homes
- Warmer, drier, healthier buildings research programme
- Research by Beacon Pathway on thermal bridging in external walls
    - Measuring the Extent of Thermal Bridging in External Timber-Framed Walls in New Zealand, and
    - Thermal Bridging in External Walls: Stage Two
- Transition to a zero-carbon built environment research programme

BRANZ is also working on:

- Updating the NZS 4218:2009 calculation method tool
- A series of webinars on practical aspects of the new H1 requirements
- Updating versions of our eLearning modules on H1
- A review of ALF 4.0 (thermal modelling tool)
- Updating the House insulation guide.