# Submission Form

## Building for Climate Change

### 1. Contact details (optional)

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| --- | --- |
| Name: |  |
| Company/organisation |  |
| Email address: |  |

### 2. Are you making this submission on behalf of a business or organisation?

No

Yes (please tell us which Company/Organisation you are making this submission on behalf of)

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### 3. Would you like to:

Remain anonymous in the published consultation summary report  No  Yes

Receive a copy of your own submission  No  Yes

Receive future updates on Building for Climate Change programme  No  Yes

### 4. Are you willing to be contacted in relation to your submission if MBIE has questions about your response?

No  Yes

### 5. The best way to describe your role is:

Architect  Building owner  Geotechnical Engineer

Building Consent Authority/Officer  Electrician  Structural Engineer

Builder  Engineer – other  Plumber/Gasfitter/Drainlayer

Building product/material supplier  Fire Engineer

Other: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

### To submit this form via email:

Once you have completed the form, you can email it to [BfCC@mbie.govt.nz](mailto:BfCC@mbie.govt.nz?subject=Submission), with “Submission” in the subject line.

### To submit a print copy of this form:

You can post or courier your submission to:

|  |  |
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| Via Courier:  Building System Performance Ministry of Business, Innovation and Employment  Building for Climate Change Submission 15 Stout Street,  Wellington 6011 | Via Post:  Building System Performance  Ministry of Business, Innovation and Employment  Building for Climate Change Submission  PO Box 1473 Wellington 6140 |

## Overarching approach of the Building for Climate Change programme

6. Do you agree or disagree that the Building and Construction Sector needs to take action to reduce emissions?

Strongly disagree  Disagree  Neither  Agree  Strongly agree

Please tell us why.

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7. What support do you think you or your business would need to deliver the changes proposed in the frameworks?

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8. Are there any barriers that are currently preventing (or discouraging) you, or your business, taking action to reduce emissions?

No  Yes

Please identify the main challenges.

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9. Do you think the Building for Climate Change work programme should include the following building classifications?

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| --- | --- | --- |
|  | No | Yes |
| Housing |  |  |
| Communal Residential |  |  |
| Communal Non-Residential |  |  |
| Commercial |  |  |
| Industrial |  |  |

If you have indicated that you believe one, or more, building classifications **should not** be included, please tell us why

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## Framework: Transforming Operational Efficiency

10. Do you agree or disagree that the Building for Climate Change work programme should include measures to improve the operational efficiency of buildings in New Zealand?

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither | Agree | Strongly agree |
| ☐ | ☐ | ☐ | ☐ | ☐ |

Please tell us why.

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11. The Framework proposes that operational efficiency requirements tighten in a series of steps to reduce emissions in the Building and Construction Sector, with the requirements for each step published at the outset and the final step being reached by 2035.

Do you support a gradual introduction of operational efficiency requirements, using a stepped approach?

No  Yes

12. Do you think the timeframe is appropriate?

|  |  |  |
| --- | --- | --- |
| ☐ Yes | ☐ No, it’s too short | ☐ No, it’s too long |
|  |  |  |

Please tell us your ideal timeframe if it's not by 2035.

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13. The Framework proposes that a number of building types will be exempt from operational emission reduction requirements.

Do you agree or disagree with the proposal to exclude the following from operational efficiency emission reduction requirements?

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| --- | --- | --- |
|  | No | Yes |
| Outbuildings |  |  |
| Ancillary buildings |  |  |

Please tell us why.

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## Approach

14. The Framework proposes that operational efficiency requirements will only apply to new buildings initially with further work to look at requirements for existing buildings being undertaken at a later date.

Do you support this approach?

No  Yes

Please tell us why.

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15. Do you support a limit on emissions from fossil fuel combustion to operate buildings (e.g. for space and water heating)?

No  Yes

Please tell us why.

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16. Do you think that new Thermal Performance requirements based on heating and cooling demand should be introduced to support increased operational efficiency of buildings?

No  Yes

Please tell us why.

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17. Detailed requirements for the efficiency of fixed services (such as heating and cooling systems, artificial lighting, hot water systems and appliances, ventilation systems etc) are not currently set out in the Building Code.

Do you think that Services Efficiency performance requirements should be introduced to support increased operational efficiency of buildings?

No  Yes

Please tell us why.

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18. The framework proposes that there are requirements for the plug loads for large buildings\*, but not small buildings. Do you support this approach?

(\*Large and small buildings as defined in the framework scope section)

No  Yes

Please tell us why.

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19. The Framework proposes that new buildings will not be required to include onsite renewable energy generation or energy storage capacity. Do you agree or disagree with this proposal?

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| --- | --- | --- | --- | --- |
| Strongly disagree | Disagree | Neither | Agree | Strongly agree |
| ☐ | ☐ | ☐ | ☐ | ☐ |

Please tell us why.

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20. The Framework currently proposes to exclude the following elements from the Building for Climate Change work programme. Which do you think should be included or excluded?

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| --- | --- | --- |
|  | Should be included | Should be excluded |
| Electrical appliance efficiency |  |  |
| On-site collection and storage of water |  |  |
| On-site waste water treatment |  |  |

Please tell us why.

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21. Buildings need to provide suitable indoor environmental quality (IEQ) for good occupant health and wellbeing outcomes. The Framework identifies the following critical IEQ parameters:

* Air temperature
* Relative or absolute humidity
* Ventilation rates
* Surface temperature
* Hygienic surface temperature (avoidance of mould)
* Daylight provision

If there are any additional elements that you think should be considered, please record them in the comment box below.

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22. The Framework proposes that the Thermal Performance energy use intensity and services energy use intensity are considered during the consent application process, and when a Code Compliance Certificate is applied for.

Do you think this would impact you or your business/organisation?

No  Yes

Please tell us why.

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23. If there are any additional tools or support that you think you would need to implement this requirement, please tell us in the comment box below.

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## Framework: Whole of Life Embodied Carbon Emissions Reduction

24. Do you agree or disagree that the Building for Climate Change work programme should include initiatives to reduce whole-of-life embodied carbon in New Zealand buildings?

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| Strongly disagree | Disagree | Neither | Agree | Strongly agree |
| ☐ | ☐ | ☐ | ☐ | ☐ |

Please tell us why.

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**To meet our emission reduction goals, a key objective of the framework is to increase building material efficiency, and reduce construction waste.**

25. What measures, if any, do you think should be put in place to increase building material efficiency? (Select all that apply)

☐ Update regulatory performance requirements to ensure they are appropriate

☐ Incentivise ‘lean design’

☐ Remove barriers to the reuse of construction materials

☐ Other (please specify)

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26. What measures, if any, do you think should be put in place to reduce construction waste?

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27. Using low carbon construction materials and products is identified as another option to reduce whole-of-life embodied carbon emissions.

How could we encourage the use of low carbon construction materials?

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**The Framework proposes introducing reporting requirements for whole-of-life embodied carbon in buildings, followed by a cap on whole-of-life embodied carbon for new building projects.**

28. Would you support a cap on whole-of-life embodied carbon for new building projects?

Yes  No

Please tell us why.

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29. Do you think a data repository of embodied carbon from buildings should be established?

Yes  No

Please tell us why.

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30. If a data repository was established, do you think this information should be able to be accessed by the public?

Yes  No

Please tell us why.

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31. Which, if any, of the following factors would make it difficult for people to report the whole-of-life embodied carbon of new buildings, and why?

Lack of an agreed methodology  Inadequate data quality and availability

Lack of appropriate tools or software  Administrative burden on businesses

☐ Other (please specify)

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32. What support, if any, do you think will be needed to make reporting embodied carbon a standard part of the design and construction process for every new building project in New Zealand?

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**The framework proposes that reporting of whole-of-life embodied carbon for buildings would be carried out as part of the building consent application process.**

33. What impact do you think this proposal will have on the Building and Construction sector?

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34. What additional tools or support would be needed to implement this requirement?

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35. Do you think that requirements for embodied carbon calculations should only include the initial building life cycle stages (product and construction stage)?

No  Yes

Please tell us why.

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36. The Framework proposes limiting the type of building components that would be included in an embodied carbon assessment, excluding components with lower emissions (such as internal fittings).

Do you agree with this proposal?

No  Yes

Please tell us why.

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37. Do you think that reporting on, and ultimately capping, embodied carbon should apply to new building projects only, not refurbishment or demolition projects?

No  Yes

Please tell us why.

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38. The Framework proposes that a simplified embodied carbon calculation tool could be used for small buildings but more detailed calculations would need to be provided for large buildings\*.

(\* Large and small buildings as defined in the framework scope section)

Do you agree with this proposal?

No  Yes

Please tell us why.

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39. Any other comments on the proposed frameworks?

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