

# Report on the summary of submissions on potential issues within the Licensed Building Practitioners scheme

11 November 2021

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## Part 1: Background

### Scope of the report

Part 1 of this report provides an overview and analysis of the findings of the consultation on potential issues within the Licensed Builders Practitioners (LBP) scheme carried out in April to June 2021.

This document reports on consultation in relation to potential issues within the following areas of the LBP scheme:

- Supervision.
- Licence classes.
- Core competencies and minimum standards for entry.

Part 2 of this report provides a summary of the stakeholder feedback received during the consultation. This feedback was received in both written submissions and online survey responses.

### Policy Context

#### **The purpose of the LBP scheme is to ensure building practitioners have the right knowledge, skills, experiences, and behaviours**

The purpose of the *Building Act 2004* (the Building Act) is to ensure buildings are safe, healthy, support wellbeing, and promote sustainable development, through:

- regulation of building work
- establishment of a licensing regime for building practitioners
- setting of performance standards for buildings
- promoting the accountability of owners, designers, builders, and building consent authorities.

The LBP scheme is an occupational regulation regime established under Part 4 of the Building Act as part of the response to systemic failures in the building regulatory system that contributed to the leaky homes crisis.

The LBP scheme is underpinned by the definition of restricted building work, which is currently defined as design or construction work critical to making a residential building structurally sound, weathertight, and fire-safe.

The LBP scheme seeks to make an important contribution to safe and durable houses, and encourage competent building practitioners by:

- mandating that only LBPs can carry out or supervise restricted building work
- requiring LBPs demonstrate they have the necessary knowledge, skills, experiences and behaviours to meet the minimum thresholds for competence.

The scheme has not been systemically reviewed since it was first introduced in 2007. Ongoing feedback from the sector and general public indicating opportunities to improve the scheme and ensure it is meeting the needs of New Zealand today and in the future. In light on this feedback, MBIE has been assessing what improvements can be made to strengthen the LBP scheme.

## **Work to strengthen the LBP scheme is part of a wider reform of the building system**

This work is being progressed as part of the Building System Legislative Reform Programme (the Reform Programme), which is a programme of reform to New Zealand's building laws to support a more efficient building system, lift the quality of building work, and provide for fairer outcomes if things go wrong. The reforms are progressing in three phases, with Phase One of reforms recently passed by Parliament as the *Building (Building Products and Methods, Modular Components, and Other Matters) Amendment Act 2021*.

Strengthening the LBP scheme is part of Phase Two of the Reform Programme. Phase Two will cover changes to occupational regulation of some professions in the building sector and engineers. MBIE proposes to make changes to the LBP scheme, alongside amendments to give effect to a proposed new regulatory regime for engineers and to improve the operation of the *Plumbers, Gasfitters, and Drainlayers Act 2006*.

Phase Three includes providing possible options to address the lack of a building warranty insurance market and risk allocation in the building and construction sector.

## **Public consultation on the Reform Programme took place in 2019**

In April 2019, public consultation was undertaken on a range of proposals to reform the building regulatory system. MBIE received 144 submissions on the LBP scheme. This was a relatively small percentage of the overall respondents. Furthermore, many of the responses came from those who did not work closely with the scheme.

The 2019 consultation did show promising results, with support for improving the Site licence class, introducing tiered licensing and addressing perceived problems with supervision in the scheme. MBIE recommended further work to investigate these issues, with an aim of hearing more from those directly involved with the scheme.

## **Consultation carried out in 2021**

### **MBIE consulted on three areas of the LBP scheme in a consultation that ran from 22 April to 6 June 2021**

The consultation asked a range of questions on potential issues within the LBP scheme. The questions aimed to determine whether these issues were real, and whether action needed to be taken to address them.

The questions were separated into three main areas:

#### **1. Supervision**

Someone who is not licensed under the LBP scheme may carry out restricted building work, provided they are supervised by an LBP licensed in that class of work. The supervising LBP is accountable for all work they supervise.

MBIE undertook consultation to determine if supervision is being executed poorly and, if it is, how widespread the problem is and whether improvements can be made.

Consultation focussed on this area because stakeholders had previously submitted, as part of the 2019 consultation, that an issue with the LBP scheme is the lack of experience requirements that must be met before an LBP can supervise restricted building work. MBIE is also aware of anecdotal evidence suggesting that some LBPs supervising restricted building work were not undertaking it in a manner that reflected what is required under the Building Act.

## 2. Licence classes

The LBP scheme currently has seven licence classes: Brick and Blocklaying, Carpentry, Design, External Plastering, Foundations, Roofing, and Site. These classes reflect the needs of the building sector at the time the scheme was introduced.

MBIE consulted on whether there was any change needed to the classes, and whether specialised non-LBPs, or those who specialised in a specific part of a class but were not licensed, needed to be captured.

Consultation sought feedback on this aspect of the LBP scheme because stakeholders have engaged with MBIE previously about the potential classes that could be added to the scheme. Feedback from the 2019 consultation suggested that areas of building work that should be captured by the scheme, and anecdotal reports of issues caused in the supervision of specialised non-LBPs.<sup>1</sup>

## 3. Core competencies and minimum standards

Applicants to the LBP scheme must meet minimum standards for licensing to become an LBP, and existing LBPs must also meet minimum standards for continued licensing. The LBP Registrar assesses these applications to determine whether these standards have been met.

The consultation asked whether the core competencies and minimum standards were resulting in low confidence in the LBP scheme and whether they needed to be raised, as well as if qualifications needed to be made mandatory.

Consultation sought feedback on this aspect of the LBP scheme because, when MBIE consulted on strengthening the scheme in 2019, Building Consent Authorities (BCAs), industry groups and some builders were of the view that the scheme does not give people confidence that LBPs are sufficiently competent. Some thought the minimum standards for competence were set too low, noting that entry requirements have not been raised since the scheme was introduced.

## Overview of the Consultation Process

MBIE ran a public consultation over seven weeks, with submitters able to respond through written submissions, or online via Survey Monkey. MBIE extended the initial deadline for responses by one week, to account the general pressures of COVID-19 on stakeholders being able to engage. Overall, 140 submissions were received.

### Written submissions

MBIE received 84 written submissions from a range of stakeholders representing a cross-section of the sector.

### Survey Monkey

MBIE received 56 online submissions via Survey Monkey. Four of these responses were blank.

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<sup>1</sup> These are practitioners who specialise in certain aspects of restricted building work without becoming licensed in that class, therefore their work needs to be supervised by an LBP who holds a licence in that class. A common concern arises from where these unlicensed practitioners are often more experienced and skilled at that particular task than the LBP supervising them.

### **Who provided feedback on the proposals**

MBIE received responses from a range of stakeholders representing a cross-section of the sector:

- 69 Licensed Building Practitioners
- Western Bay of Plenty District Council
- Whanganui District Council
- Christchurch City Council
- Auckland Council
- Southland District Council
- Wellington City Council
- Registered Master Builders
- Master Plumbers, Gasfitters and Drainlayers NZ
- Certified Builders New Zealand
- Roofing Association of New Zealand
- New Zealand Construction Industry Council
- Building Officials Institute of New Zealand
- the Building Practitioners Board.

## Part 2: Outcome of the consultation

### MBIE response to submissions

The responses confirmed what MBIE had previously heard from stakeholders about the way the scheme is currently operating. The feedback from consultation has affirmed that the potential issues have been accurately identified, and shows there is consistent support for changes in these areas.

MBIE has now completed the critical analysis of the submissions, and will now begin work on policy decisions that will address the confirmed issues within the scheme.

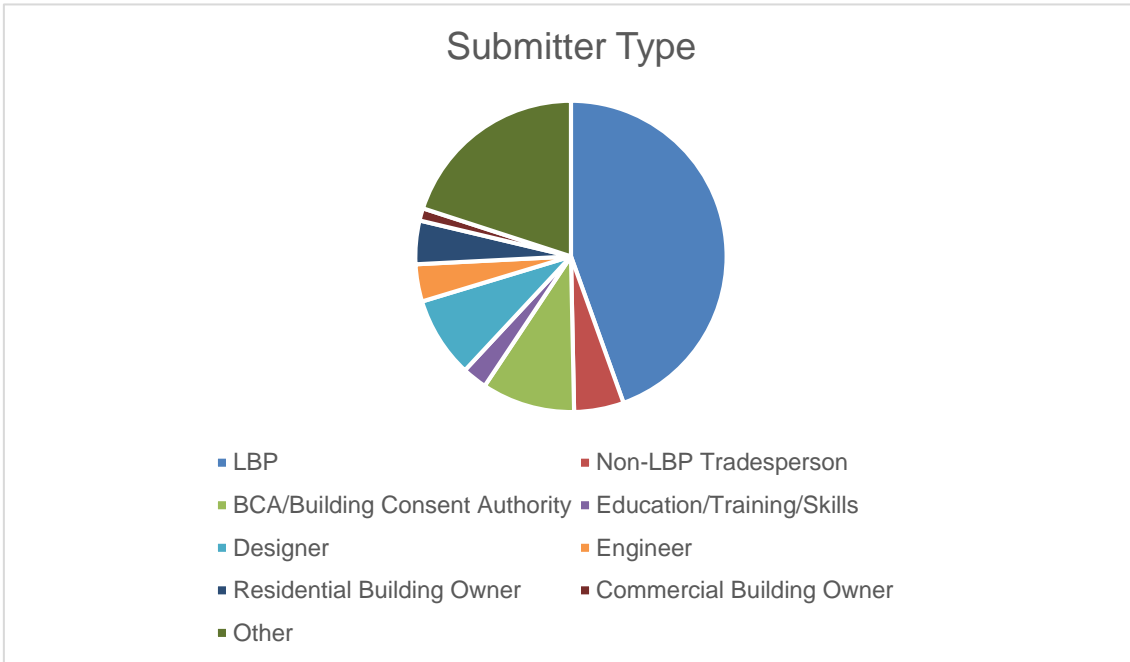
### Summary of submissions

MBIE undertook an analysis of the submissions received in two formats: written submissions and an online survey.

MBIE received a total of 140 responses. The overall breakdown of the submitters' occupations is as follows:

Submitter Type	Amount
LBP	69
Non-LBP tradesperson	8
BCA/Building Consent Officer	15
Education/training/skills	4
Designer	13
Engineer	5
Residential Building Owner	7
Commercial Building Owner	2
Other	30
<b>Total</b>	<b>153<sup>2</sup></b>

<sup>2</sup> Note: submitters could identify as more than one option.



Overall MBIE considers it succeeded in reaching the desired demographics.

## Submissions

### Supervision

The LBP supervision model is a trust-based model that provides LBPs with a level of autonomy. The Building Act does not specify how an LBP must supervise restricted building work or when an LBP must use direct supervision or remote supervision.

“Supervise” is defined in section 7 of the Building Act as providing control or direction and oversight of building work to ensure that it is performed competently, and complies with the building consent under which it is carried out. Put simply, if a builder is providing control, instruction, or direction to others who are carrying out building work, they are supervising.

MBIE has produced a practice note that provides guidance as to what good supervision looks like and the circumstances an LBP should take into account when deciding which method of supervision is most appropriate.

**Submissions confirmed that substandard supervision was happening, but confirmed it was not widespread.**

Submissions agreed that the current supervision model, which provides LBPs with a level of autonomy on how they approach supervision, is appropriate.

More than half of submitters felt that supervision, both onsite and remote, was not working well, and that there were gaps that needed to be addressed. The main issues raised in the submissions in relation to the current model were:

- the lack of consistency in the interpretation of what good supervision looks like in practice and many felt that some LBPs remote supervision was not sufficient



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- LBPs were supervising non-LBPs that had more specialist expertise but were not licensed, and were therefore not best-placed to determine if the building work complied with the building consent
- an LBP could be responsible for supervising non-LBPs' restricted building work immediately after becoming licensed without their ability to do so being tested.

It was not clear from the submissions what problems these issues are causing and whether there was a case to change how supervision of restricted building work is regulated. We consider that there may be other ways the issues can be addressed, without regulatory change.

The main issues raised by stakeholders are discussed in detail below.

- *Both on-site and remote supervision are not being carried out as intended by some LBPs, and these practitioners are not being held to account.*

Sixty-two per cent of submitters felt that supervision was not working well, and that there were gaps that needed to be addressed.

There was a strong view amongst submitters that there is a lack of consistency across the sector about how supervision should be undertaken. Many submitters were concerned that LBPs supervising restricted building work were not undertaking supervision in a manner that reflected what they thought was good practice or was required under the Building Act.

Another theme that emerged was the behaviours of some LBPs which was leading to substandard supervision. Examples of substandard supervision raised in submissions included signing off on work with no knowledge of what has been completed and some LBPs supervising more than they can handle.

Submitters did agree that because the supervision model is a trust-based model, it is susceptible to being misused. This wasn't viewed to be a wide spread problem because only a minority of LBPs were seen to be purposefully undertaking supervision in a manner that did not reflect the requirements in the Building Act.

A number of submitters thought the guidelines for how supervision should be undertaken was unclear and open to interpretation. Many held the view that there was not the right level of guidance on what supervision looks, particularly what the expectations are of an LBP who undertakes remote supervision. This could be a potential cause of the inconsistency across LBPs in regards to how they conduct supervision.

Submitters also felt that remote supervision was not being conducted in a manner that would meet the minimum requirements of the Building Act. Examples included LBPs issuing records of work without physically seeing the finished work, with some not once setting eyes on the project they were supervising, even from a distance.

Another common theme from submissions was the perceived inability to report LBPs who did not supervise to the required standard, or abused the remote supervision model. Stakeholders were of the view that, if those who were undertaking substandard supervision were being held to account more by others on the building site, then supervision would improve. Many submitters felt there was no way to report these LBPs, so there was no deterrent to this behaviour.

Our recommended approach to responding to these submissions is for us to identify if there are any administrative barriers that could be creating difficulties for people to report substandard supervision. This will involve assessing the existing tools for

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reporting LBPs, such as the Report a Cowboy app, and working with stakeholders to understand if reporting pathways need to be modified, and what current guidance could be improved, to provide consistency in how LBPs conduct both onsite and remote supervision.

- *Supervision should only be undertaken by some LBPs, and should be addressed in the scheme's core competencies.*

Sixty-three per cent of submitters agreed that supervision should only be carried out by certain LBPs, generally determined by skill level. Submitters expressed concern that LBPs, new to the workforce are automatically able to supervise restricted building work upon being licensed. There was a view that these LBPs were being entrusted to supervise without being subject to checks that would confirm whether they are able to do so competently. Many submitters felt it was a gap, and licensees should be subject to competency checks to ensure they have the ability to supervise restricted building work.

Some submitters thought the assessment process currently laid out was sufficient for ensuring the LBP had the competency to supervise. MBIE considers that these concerns may be addressed by undertaking a review of the competencies a practitioner must meet to become licensed rather than introducing new requirements that must be met to authorise a person to supervise restricted building work.

Overall, both of these views have validity, however reliance on the assessment process to ensure an LBP is experienced enough to supervise restricted building work will be dependent on what level the competencies are set at that a practitioner must meet to become licensed.

Our recommended approach for responding to these concerns is for MBIE to work with stakeholders such as the Building Practitioners Board and the LBP Registrar to determine whether this matter could be addressed by updating the scheme's core competencies, introducing a tiered licence system,<sup>3</sup> or both.

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<sup>3</sup> Refer to page 14.

## Licence Classes

When the LBP scheme was introduced in 2007, the classes reflected the needs of the sector and where it was determined the most prevalent issues were. The licence classes chosen when the LBP scheme was introduced were selected to respond to issues in the sector at a time when it was still recovering from the leaky homes crisis. While the classes covered the areas of concern at the time, they have not been reviewed since and it is possible that they are not effective for managing risks in today's building industry.

In the past, MBIE has been approached by bodies representing various professions who are not currently represented by the scheme. MBIE is also aware of increasing specialisation in the sector, where practitioners focus on niche areas within a broader class.

The consultation's questions on licence classes have been broken down into four main areas: Classes, Areas of Practice, Site Licence, and Licence Structure.

## Classes

Many submitters were unhappy with the way that 'specialised non-LBPs' were being supervised. These specialised non-LBPs are those whose work was considered restricted building work, but they themselves were not licensed in any class. Many were concerned that these practitioners were not being supervised competently by LBPs who were often less-experienced than the person they were supervising.

Some submitters also raised concerns about the operation of section 291 of the Building Act, which provides for people licensed under other occupational regulation regimes to automatically be authorised to act as an LBP under the LBP scheme. Architects, engineers, and plumbers, gasfitters and drainlayers are treated as if they are licensed in certain licence classes specified in the *Building (Designation of Building Work Licensing Classes) Order 2010*, and are therefore 'deemed LBPs'.

Submitters were also asked if they felt any classes of restricted building work should be added or removed. The majority of submitters were happy with the current classes, with most submitters of the view that they still had their place within the scheme.

While there was a clear view that no classes needed to be removed from the scheme, 80 per cent wanted to see at least one or more professions added to the scheme.

### **Many problems within the scheme are caused by those who work with it but are not licensed in it**

Sixty per cent of submitters agreed the scheme needed to regulate specialised non-LBPs in some way, however submitters were not forthcoming with way in which it could be done. Their submissions were based on the amount of sub-standard work that was alleged to have been completed by these professionals, and the low standards of supervision of their work.<sup>4</sup>

Issues around deemed LBPs are centred on the poor quality of work often completed by them, with a lot of the submissions pointing to the lack of care put into the restricted

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<sup>4</sup> As discussed on pages 8-10.

building work by these professionals, and the lack of immediate accountability faced by virtue of them not having to have their work signed off by an LBP.

MBIE considers that the most appropriate response is to review the licence holders under other enactments that are automatically recognised as LBPs in accordance with section 291 of the Building Act, by working with the professions' respective governing bodies to determine where changes may be needed, for example by determining if the competency requirements under the respective enactments are aligned with those of the LBP scheme.

**Submitters were mostly agreed that the licence classes already in the scheme should remain and advocated for additional classes that could be added.**

Most submitters were satisfied with the current classes' place in the scheme, highlighting the continued need for regulation in those areas.

A small portion of submitters proposed that Design class should be removed. Some submissions expressed an opinion that Design work wasn't 'building work', while others put forward that it would be better suited in the same occupational regulation regime as architects. At this stage, MBIE considers that there is still a place for the Design class in the scheme due to the fire safety aspects involved in the class, and that there is still need for regulation in the area.

A large majority of submitters wanted new classes added to the scheme, ranging from plasterboard installers and waterproofers to insulation installers and window retrofitters. Most areas that were proposed by submitters were based on areas of the sector where they had seen the most failures in, and felt that stronger regulation was needed.

Stonemasonry, whose addition to the scheme was consulted on in 2018, was also raised by many within the industry as a class that should be added, with arguments centred on the previous consultation.

MBIE considers the most appropriate response to be to assess whether there is a need to include additional classes of work within the LBP scheme by determining whether there is a problem with the work being undertaken by unlicensed people.

## **Areas of practice**

Currently, when an LBP becomes licensed in a class, they are required to demonstrate they are competent in one or more areas of practice in that class. They are not required to be competent in all the areas of practice for a class, and are not limited to working within only the areas designated on their licence. An LBP may work in other areas within their licence class, provided they do not work outside of their competency level.

MBIE is aware that the current structure leaves the door open for LBPs to work in areas that they may not be competent in, but are technically licensed in.

While some respondents agreed that there were instances of LBPs working outside of their competencies, the overall consensus was that this was by a small minority of LBPs.

The consultation asked whether the Site and Design classes, which are separated by building complexity rather than the type of work, was operating well. Most submitters agreed that there was not a problem with the way these classes were set up. Some did

express concern that someone could operate in any class whether they were licensed in that particular class or not, particularly in the Design class, where an LBP could be licensed in Level 1 or 2 but design a more complex Level 3 building.

**The ability for LBPs to operate in other areas of practice within their licence class is generally working well, and those doing so without ensuring their competence are only a small minority.**

The majority of submitters put forward that, when LBPs worked in another area of practice that they had not been deemed competent in, but was within a class they were licensed in, they usually did so within their competence as required.

There were some submitters who said that LBPs were working in areas of practice when they were not competent, however many of those were actually referencing LBPs who were working outside of their competence in general (i.e. not adequately skilled at the work they were doing). For example, some submitters mentioned the Carpentry class, which does not have areas of practice.

MBIE considers that there is not a case for legislative change to stop LBPs from working outside of the areas of practice they are licensed in. MBIE considers that the recently-issued Code of Ethics, as well as an investigation into the abilities of deemed LBPs, will further help reduce instances of this.

**Site licence**

When the scheme was conceived, the Site licence was seen as an important area, which would monitor the junction where different trades met on a building site – an area often cited as a key area of failure which led to the leaky homes crisis. MBIE is aware that there has been a perception that the licence has not lived up to its potential and needs overhauling. This is due to the fact there is no regulatory requirement for anyone to hold a Site licence, as the work a licence holder can undertake does not fall under restricted building work.

Over half of submitters thought that the building sector still needed the Site licence class, despite a widespread belief that it was not living up to how it was conceived. Sixty-nine per cent of respondents agreed that the construction industry still needed the licence. They submitted that it was still an important part of the industry and that, when utilised as intended, provides a way for ensuring the entire build is being completed to the required standard. While submitters made these general comments, there were no suggestions as to how restricted building work could be added to the class

Those who did not agree with keeping the Site licence were of the view that it had no value and that the work the Site licensee does could also be completed by those with other licence classes.

**The Site licence is still a valuable part of the New Zealand building sector, but change is needed to give the class a greater role in the current scheme.**

Submitters were agreed that the Site licence needed to be improved to provide value to the sector. Most suggestions came down to one of two main ideas:

- Allowing only those with Site licences to supervise restricted building work; or

- Modify the Site licence to be more like the Clerk of Works role that was prominent before the introduction of the LBP scheme,<sup>5</sup> which would mean that the licence holder was more hands-on in the management of the site.

The submissions that favoured retaining the Site licence pointed to the need for overall site supervision in the building industry, echoing points made about supervision earlier in the document. They also pointed to the vast opportunities the licence class affords, for both the LBP and the sector overall.

MBIE considers it is worthwhile to further investigate potential improvements that can be made to the Site licence.

## Licence structure

The LBP scheme operates on a flat structure where, once licensed, those within the scheme are licensed at the same level as everyone else, regardless of differences in formal qualifications and years' experience working in the trade. In the April 2019 consultation this was raised as an issue where submitters were concerned about the scheme only regulating the minimum skill level.

An original objective of the scheme were to raise the overall skill level of those within it. A tiered licence structure could achieve this, and would mirror other occupational regulation schemes, such as the Plumbers, Gasfitters and Drainlayers scheme and the Electrical Workers scheme.

Support was overwhelming for a tiered licence structure, with over 70 per cent of submitters saying that the scheme should distinguish those based on experience and ability, and 56 per cent supporting the introduction of a tiered structure. A minority of submitters did however express concern that a tiered licence could be based solely on the applicants' experience and not their actual skill level.

### **The LBP scheme should introduce a tiered licence structure that recognises LBPs for their experience and abilities.**

The majority of submitters favoured the introduction of a tiered licence scheme, citing that it would give experienced and able LBPs an opportunity to separate themselves from those who have just entered the scheme. The most common idea was for only those licensed in a higher tier able to supervise restricted building work, therefore ensuring only the most competent LBPs were supervising.

Those who were against the idea thought it would introduce too much bureaucracy and red tape into the scheme. Some submitters also warned against using time served as the marker for progression, highlighting the risks of poor workmanship if skills are not properly tested before progression.

Based on this feedback, MBIE considers that there is a mandate to investigate various potential tiered licence structures, but will also ensure that the concerns of those who warned against it will be taken into account when developing any structures.

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<sup>5</sup> A Clerk of Works is someone who provides independent assessment of building work as it is being undertaken, often on behalf of the consumer.

## Core competencies and minimum standards for entry

Applicants to the LBP scheme must meet minimum standards for licensing to become an LBP, and existing LBPs must also meet minimum standards for continued licensing. The LBP Registrar assesses these applications to determine whether these standards have been met.<sup>6</sup>

MBIE is aware that the core competencies and minimum standards for entry may not be suitable for today's industry, and may warrant lifting. This is based off feedback from the April 2019 consultation, which suggested that the standards of the scheme were too low, leading to LBPs who were licensed but not necessarily competent, and therefore leading to low confidence in those under the scheme.

Just over half of submitters were of the view that the standards of the core competencies, minimum standards, and continued assessments should be raised. A similar majority submitted that qualifications should be made mandatory.

### **The overall standards for competence in the LBP scheme need to be reviewed to ensure the skill levels of those licensed are sufficient.**

Across the board, submitters were mixed over whether the overall standards for competence were currently set at the right level. Just over half were in favour of raising the standards, saying that it is something the scheme has needed for some time and that it was allowing incompetent practitioners into the scheme.

Some who submitted that the standards needed to be raised also pointed to the tertiary institutes that are training potential LBPs before they enter the scheme, saying that some LBPs were set up to fail by the structure of these courses and the lack of real-world experience they afford.

However, some submitted that raising the competencies could both drive builders away from the industry and deter others from joining. They pointed out that raising the competencies too far could make deter prospective LBPs from getting licensed, further increasing the burden on LBPs that are licensed. They also pointed to the fact that, while the building sector in New Zealand is not perfect, it is anecdotally in a better state than it was during and before the leaky homes crisis which precipitated the need to the scheme.

MBIE considers that a review of the Rules that set the current requirements for licensing is warranted and MBIE will work with the Building Practitioners Board to review them to ensure they are fit for purpose before determining whether they should be increased.

### **Qualifications provide a lot of value for new and prospective LBPs and should be encouraged, however making them mandatory may exclude some potential LBPs from becoming licensed.**

Fifty-nine percent of respondents were in favour of mandatory qualifications, with arguments that it was already overdue. Those who were in favour did not provide any detailed rationale for this decision beyond the scope of knowledge one has to learn to

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<sup>6</sup> As outlined in the *Licensed Building Practitioners Rules 2007*.

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become qualified, and that this would set them up for success upon entering the LBP scheme.

Those that disagreed with mandatory qualifications submitted that it would exclude a lot of otherwise competent builders, as qualifications are not suitable for everyone. Submitters thought people would miss out on becoming licensed because of this requirement, especially as there is already an avenue for these people to get certified and assessed to join the LBP scheme. It is important that any mandate around qualifications does not become a barrier for entry into the scheme.

Many of those who were in favour of mandatory qualifications also suggested that those without qualifications be made to go through a more rigorous assessment process than those that have them. This mirrors the current assessment process, where those with qualifications take a different pathway into the scheme than those without,<sup>7</sup> with the qualified pathway being less rigorous based on assumed knowledge by virtue of the qualification held by the applicant.

MBIE considers that submissions on both side of the issue make valid points and that, while the issue still needs to be investigated further, the current system in place may be the right answer. It will be paramount that any changes to this area do not stop any particular groups from entry to the scheme by disadvantaging them.

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<sup>7</sup> Except for Design, which has no recognised qualifications and therefore no qualified pathway.



## List of key stakeholders included in the targeted consultation

The targeted consultation ran from 3 September 2020 to 26 October 2020.

MBIE identified the persons most impacted by the proposals as:

### Individual LBPs

#### Regulators

The Building Practitioners Board

NZ Registered Architects Board

#### Government bodies<sup>8</sup>

Wellington City Council

Western Bay of Plenty District Council

Southland District Council

Christchurch City Council

Auckland Council

Hamilton City Council

The Building and Construction Industry Training Organisation

#### Peak membership bodies

Registered Master Builders New Zealand

Master Plumbers, Gasfitters and Drainlayers Inc.

Brick and Blocklayers Federation New Zealand

New Zealand Stonemasons Association

Architectural Designers New Zealand

Roofing Association New Zealand

Concrete New Zealand

Building Officials Institute of New Zealand

New Zealand Institute of Building

Construction Health and Safety New Zealand

NZ Specialist Trade Contractors Federation

Association of Wall & Ceiling Industries

Design Association of New Zealand

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<sup>8</sup> This excludes government bodies that included in departmental consultation