

Submission Form

Submission information

Personal details and privacy

Q1. I have read and understand the Privacy Statement above. Please tick Yes if you wish to continue*

Yes

No

Q2. What is your name?*

Vicki Cowan

Q3. Do you consent to your name being published with your submission?*

Yes

No

Q4. What is your email address? Please note this will not be published with your submission.*

Privacy of natural persons

Q5. Are you submitting as an individual or on behalf of an organisation?*

Individual (skip to Q8)

Organisation

Q6. If on behalf of an organisation, we require confirmation you are authorised to make a submission on behalf of this organisation.

Yes, I am authorised to make a submission on behalf of my organisation

Q7. If you are submitting on behalf of an organisation, what is your organisation's name? Please note this will be published with your submission.

Home Performance Advisor Training Programme

Q8. If you are submitting on behalf of an organisation, which of these best describes your organisation? Please tick one.

Iwi, hapū or Māori organisation

Energy retailer

Energy regulator

Energy distributor

- Registered charity
- Non-governmental organisation
- Local Government
- Central Government
- Academic/Research
- Other. Please describe: Industry recognized Training Programme

Q9. I would like my submission or parts of my submission to be kept confidential.*

- Yes
- No

Q10. If you answered yes to Q9 above, please provide your reasons and grounds under [section 9 of the Official Information Act](#) that you believe apply, for consideration by MBIE.

Q11. If you answered yes to Q9 above, please confirm you will provide publishable versions of your submission in both Word and in PDF by emailing them to the MBIE secretariat at energyhardshipMBIE@mbie.govt.nz - clearly labelling both "for publication"

- Yes
- No

1. HPA GENERAL COMMENTS

HPA is a training programme with strong links to the following organisations: Beacon Pathway, CEN, Eco Design Advisor Network and BRANZ. HPA understands most of these organisations will submit and so has confined comments to building capacity of those providing advice to New Zealanders at home.

2. RESPONSE BY KETE

2.1 Health of the Home

Proposed Action		Comments
Strengthen and expand Warmer Kiwi Homes (WKH) programme (measures, reach and funding) so more low- income New Zealanders are supported into energy wellbeing (links to KN1)	HH1	<p>Yes broadly support</p> <ul style="list-style-type: none"> Referral pathways are critical and need depth of knowledge, i.e. appropriately trained, in all regions of NZ. This depth should include HPA-certified advisors (e.g. Eco Design Advisors, CEN members, and independents), a greater number trained to Principles of Home Performance (e.g. staff of Health Homes Initiative), and multiple community-based workers trained to HPA's healthy homes (e.g. EnergyMate's financial mentors, health sectors and curtain banks). Recommend specifying "effective curtains". An effective curtain is double-layered, installed so when shut they create an insulating layer of still air on inside of window (no gaps at top, bottom, side). "Thermal curtains" this can be taken to mean curtains with rubberised backing (minimal thermal properties).
Fund broader building repair and improvement work to support home retrofit programmes	HH2	<p>Yes broadly support</p> <ul style="list-style-type: none"> Support programmes to address repairs and maintenance so energy interventions will be effective.
Strengthen the monitoring, compliance and enforcement of the Healthy Homes Standards (links to HH4)	HH3	<p>Yes broadly support</p> <ul style="list-style-type: none"> Recommend lessening tenant burden (e.g. to challenge HHS compliance) by requiring all HHS compliance checks be undertaken by an independent assessor who is appropriately trained (HPA) for this work. HPA's Principles of Home Performance course trains practitioners in fundamentals of healthy and efficient homes. This course does not specifically train how to assess HHS compliance. HPA would welcome an opportunity to discuss the development of a specific HHS module to top up HPA trained practitioners. HPA has most of the building blocks required.
Strengthen advocacy and support services for tenants	HH4	<p>Yes broadly support</p> <ul style="list-style-type: none"> HPA recommends Tenancy Services in local offices staff trained to at least HPA's Principles of Home Performance (1-day) so central representatives at community understand the underpinning principles of the HHS. This would better support tenants (how they live in a home) and landlords (what a home has) working together to achieve the desired outcomes.

Proposed Action		Comments
Expand all energy-related MSD purchase assistance programmes for household appliances to offer energy efficient choices	HH5	<p>Yes broadly support</p> <ul style="list-style-type: none"> Recommend links to EECA's MEPS/labelling programme, ideally worst performing lights and appliances are removed from the market.
General comment		<ul style="list-style-type: none"> HPA advocates for the expansion of curtain banks so all communities can access effective curtains. Ideally curtain banks provide and install effective curtains in homes and support households to understand the value and best use of their new curtains. Curtain banks require sustainable funding to operate across New Zealand in ways that best meet the needs of their local communities. HPA strongly supports Curtain Call www.curtaincall.org.nz, which advocates for the inclusion of effective curtains in the Residential Tenancies (Healthy Homes Standards) Regulations 2019.

2.2 Knowledge and Navigation

Proposed Action		Comments
Establish and fund a nation-wide "energy wellbeing sector network" to facilitate and support enhanced service integration and collaboration between local organisations and establish co-networks for Māori and Pacific practitioners (links to HH1, HH4, KN2, KN4 and KN5)	KN1	<p>Yes broadly support</p> <ul style="list-style-type: none"> HPA supports improved collaboration across all actors who have a stake in energy hardship operating at regional level (e.g. energy, health, housing, budget, climate). Important any national network helps central government agencies understand community needs so organisations are adequately resourced to deliver locally developed solutions (including capacity building and training).
Strengthen and deliver energy wellbeing 'navigator' training (such as Home Performance Advisor), including Māori and Pacific energy wellbeing training wananga/programmes that are grounded in Te Ao Māori and Pacific worldviews.	KN2	<p>Yes broadly support</p> <ul style="list-style-type: none"> HPA is well established (certifying advisors since 2012). HPA is backed by research organisations like BRANZ and Beacon Pathway. HPA was formed as a collaboration between Beacon Pathway, Community Energy Network and Toimata Foundation (Enviroschools) HPA's kaupapa is to raise the standard of advice given by practitioners in New Zealand homes so that advice and recommendations: <ul style="list-style-type: none"> focus on 'whole of house' performance; are backed by Western Science and informed by mātauranga Māori; are practical and relevant to householders and in their best interests; are independent of product brands and organisations; and,

Proposed Action		Comments
		<ul style="list-style-type: none"> ○ consider the health of our planet and the impact that environmental health has on people • HPAs training courses are pitched at creating a depth of knowledge about healthy efficient homes across a community network. The Healthy Homes course enables community workers who visit homes as part of their day jobs (e.g. EnergyMate financial mentors) to have informed conversations with whānau and refer big problems on. The Principles of Home Performance course ensures workers in housing-focussed projects and programmes (such as HHI) understand how homes work. Passing HPA’s certification course means advisors can reliably provide independent home performance advice to households (e.g. Eco Design Advisors and CEN members). • Many Māori and Pacific peoples attend HPA training, and have benefitted. We’ve seen many examples where this knowledge has then been delivered in a way that makes sense for different communities. We see great potential to build on these relationships.
Strengthen and extend MBIE’s Support for Energy Education in Communities (SEEC) programme, and ensure funding targeting and programme design recognise those groups over-represented in energy hardship such as Māori, Pacific peoples and tenants.	KN3	<p>Yes broadly support</p> <ul style="list-style-type: none"> • HPA recommends all programmes rely on training to ensure energy messages are consistent and based on good science and best practice provision of advice to whānau. • Training to ensure energy messages can be tailored to individual households is critical • Training needs to be provided a time that is right for each community group. Support and mentoring is critical both before training (as organisations are building understanding and capacity to include healthy homes in their work programme) and after training (as organisations operationalise their training into home visits projects and programmes)
Develop and deliver an Energy Wellbeing Education Strategy for targeted education on energy-saving practices, consumer protection rights, and how to access authoritative information (including targeting for specific groups over-represented in energy hardship)	KN4	<p>Yes broadly support</p> <ul style="list-style-type: none"> • HPA supports the development of an Energy Wellbeing Education Strategy to underpin energy well-being navigator training. This Education Strategy is part of the glue that holds many of these strategies together. • Whānau should be at the centre of this strategy and have an ecosystem of healthy and efficient homes advisors supporting them. Point as above, ecosystem of advice needs breadth (i.e. in every region) and depth (range of expertise) so it is self-supporting, and capacity can continue to build. This eco-system also offers interesting career pathway opportunities for workers engaged in health/well-being, financial and housing support of whānau at home.
Develop and maintain a comprehensive online portal as a “go-to” for accurate, up-to-date and complete information for tenants, landlords and homeowners to	KN5	<p>Yes somewhat support</p> <ul style="list-style-type: none"> • All participants on HPA’s Healthy Homes course value training provided on reading energy bills, comparing their bills on PowerSwitch and how to engage with your energy retailer. Significant numbers of trainees save money in their own homes and are empowered to share this knowledge. Improving ease of use of these websites would help.

Proposed Action		Comments
support improved energy wellbeing, good energy choices, efficient energy use in the home and consumer protection rights		<ul style="list-style-type: none"> Energy is complex to understand and so the key step is having people in community who understand energy and how households use it to support whānau using the tools. Website won't drive change without these informed community-based conversations. HPA holds a practitioner's hub originally designed to provide ongoing professional support – mix of papers and a forum for practitioners to access expert input. The Hub has been hard to maintain, community organisations more likely to pick up phone and remains unused. Recommend any development is integrated with other central government websites such as building.gov (MBIE is currently merging information from Smarter Homes into a single url)
Simplify energy bills and information access, improve comparability across electricity tariff structures, and improve price comparison services	KN6	<p>Yes broadly support</p> <ul style="list-style-type: none"> HPA participants consistently report frustration at the complexity of energy bills, key barrier to feeling empowered to manage energy at home.

2.3 Energy Accessibility and Choice

Proposed Actions		Comments
	AC1	Yes broadly support
	AC2	Yes broadly support
	AC3	Yes broadly support
	AC4	Yes broadly support
	AC5	Yes broadly support
Ensure those in energy hardship can access the benefits of, and do not face undue costs from, the transition to low emissions energy, including explicitly reflecting energy wellbeing requirements in Government's Equitable Transition Strategy, Energy Strategy and Gas Transition Plan	AC6	<p>Yes broadly support</p> <ul style="list-style-type: none"> Households experiencing energy hardship need to be supported to spend more energy to achieve health and well-being. HPA-certified practitioners help whānau understand how to do this effectively in their particular home. Whānau experiencing energy hardship must be central to any government strategies and plans for energy and climate change.

2.4 Energy Affordability

Yes broadly support all

2.5 Consumer Protection

Proposed Actions		Comments
Review and strengthen the Consumer Care Guidelines including expanding to include mandatory consumer care obligations on all electricity retailers	CP 1	Yes broadly support <ul style="list-style-type: none">HPA training helps participants empower themselves to engage with energy retailers: most overcome their fear/reluctance to ring about their bill, but some require more support. Retailers exercising consumer care is essential part of all New Zealanders engaging constructively with their energy use