MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
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2

Discussion paper –
Building system legislative reform

Building products and methods

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Contents

Summary of Part 2: Building products and methods

Useful product information and clearly defined responsibilities support safe and durable buildings

Building products and methods are central to safe and durable buildings. Current building product regulation leaves gaps and has disincentives that create inefficiencies throughout the building regulatory system.

The changes set out in this section address several problems:

- Product information often lacks clear detail on the product's performance.
- The roles and responsibilities for building products and methods are not clear.
- Manufacturers and suppliers have disincentives to provide product information.
- It's common practice to substitute products without applying for a variation to the building consent.
- MBIE has to rely on voluntary cooperation when it investigates building products and methods
- Consenting processes for modern methods of construction, including off-site manufacture, are not always clear or consistent.

We want stakeholders' feedback on seven proposed changes

1	Widen the purpose of the *Building Act* to include the regulation of building products and methods.
2	Provide clear definitions for 'building product' and 'building method'.
3	Require product manufacturers and suppliers to supply information about their building products. Set minimum standards for that information. This would not apply to building methods
4	Clarify responsibilities of manufacturers, suppliers, designers and builders for building products and building methods.
5	Give MBIE the power to compel information to support an investigation into a building product or method.
6	Strengthen the framework for product certification for building products and methods (See page 26.)
7	Enable a regulatory framework for modern methods of construction, including off-site manufacture. (See page 32.)

These changes will help deliver the programme's outcomes

The programme's three key outcomes are safe and durable buildings, an efficient regulatory system and a high-performing building sector.

The proposals set out in this section will help meet these objectives by:

- increasing the quality of information on building products and methods
- allowing people to be held accountable for building products and their use
- reducing the risk of defects in building work.

New Zealand's buildings depend on building products and methods that are fit for purpose

Building products come in many shapes and sizes

Building products are the materials used in building work, building methods are ways products are used in building work. They are central to producing safe and durable buildings. Around 600,000 building products are available in New Zealand.

Building products come in many shapes and sizes.

- From simple to complex. From a nail to a prefabricated panel that's made up of multiple components. Modern methods of construction (MMC) can produce products that range from factory-made bathroom pods, to complete houses produced by 3D concrete printers.
- With single or multiple uses. A product's use determines how it contributes to the overall performance of a building. Identifying and specifying the right product – and using it correctly – requires technical knowledge of the building product and New Zealand's building code.
- From many sources. They can be made in New Zealand or imported by wholesalers, retailers or building owners.
- Building products and methods must be fit for purpose – and the system of building regulation should encourage behaviours that help the building sector to build it right the first time.

The proposed changes focus on four objectives

Building products, methods and building work are changing in ways that nobody expected when the *Building Act* came into effect in 2004. Changes include MMC and a significant increase in imported building products. Regulation needs to be flexible enough to support innovations that increase productivity and ensure that buildings are safe and durable.

The proposed changes to how MBIE regulates building products and methods will help deliver positive outcomes. The objectives of the proposed changes are:

- Clear roles, responsibilities and accountabilities across product lifecycles.
- Risk-based, coherent, adaptable processes for regulation and assurance. The processes must take into account the effect of the failure or non-performance of a building product or method.
- A vibrant, competitive market for building products. Regulation must not be a significant obstacle to bringing innovative products or method to market.
- A product regulation system people have confidence in. People in the industry should be confident that the regulation system works well and building products and methods meet the requirements of the building code.

How building product regulation works today

The building product system has many participants

The system has many participants – from those who design, manufacture and supply the products, to the designers, builders and building owners who specify, install and use them. By 'builders' we mean 'any person who carries out building work, whether in trade or not', as defined in the *Building Act*[1] – this includes carpenters, plumbers and other tradespeople.

People's existing roles and responsibilities for building products are set out in the *Building Act*. They're mostly expressed in terms of how building products relate to building work. Some responsibilities are set out in consumer protection and commercial legislation.

The *Building Act* defines some roles and responsibilities for building products

Building product manufacturers and suppliers are not obligated to provide information about their building products. But if they do provide information, they must ensure it's accurate. Under consumer protection and commercial law, their goods must be fit for purpose.

Designers'[2] plans and specifications must be sufficient to result in building work that complies with the building code. They must ensure that the products and methods they specify comply with the building code.

Builders are responsible for making sure their work complies with the building code, the building consent and the related plans and specifications. This includes making sure they use the specified products, and that all the products they use comply with the building code.

Building owners are responsible for obtaining the necessary consents for the building work.[3] They must also get permission from the building consent authority (BCA) if they want to replace a building product in the signed-off consent with a different product (product substitution). Someone else, such as a builder, can also do this on the owner's behalf. Building owners are responsible for maintaining their buildings – some products may have specific maintenance requirements.

The *Building Act* includes implied warranties for residential building work. These include a warranty that all materials will be fit for purpose and new (unless stated otherwise).[4] Building contractors are required to remedy defects for 10 years, including defective materials.[5] The *Building Act* defines a building contractor as someone who 'agrees with another person (the client) to do building work for the client in relation to a household unit'.

1 Section 14E, *Building Act*.

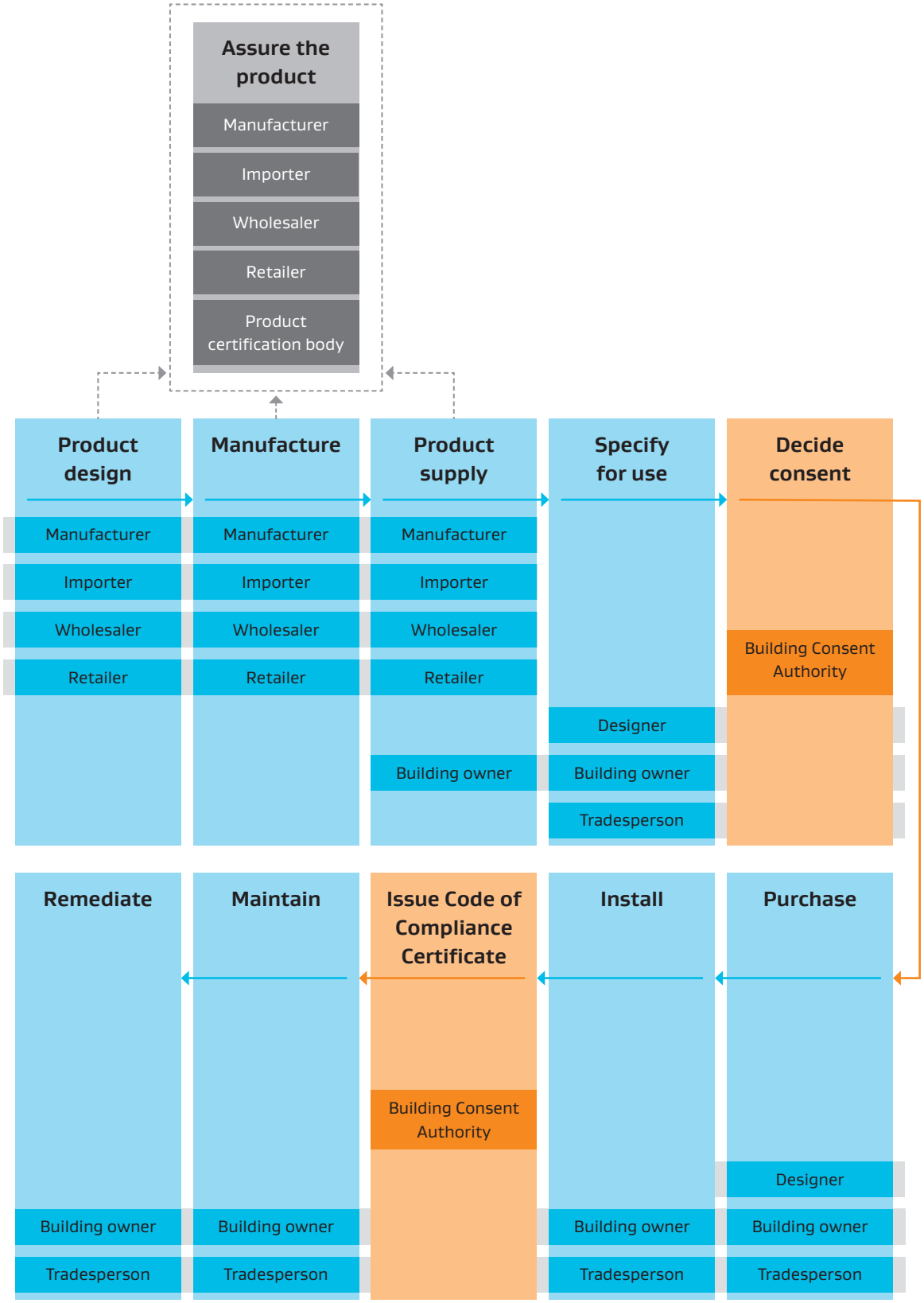
2 A designer is someone who prepares plans and specifications for building work or who gives advice on the compliance of building work with the building code (section 14D, *Building Act*).

3 *Building Act*, section 14B.

4 *Building Act*, section 362I.

5 *Building Act*, sections 362M and 362Q.

Building products interact with multiple parties across their lifecycle



If the defect can't be remedied, builders can be required to compensate homeowners for any reduction in the value caused by the building work and pay damages.[6] Builders must provide homeowners and the relevant territorial authority with information on any warranties for the products used and any maintenance requirements.[7]

MBIE can issue a warning or ban for products and methods

The *Building Act* provides MBIE with powers to issue a warning or ban a building method or product if the chief executive considers on reasonable grounds that the use of a building method or product has resulted, or is likely to result, in a building or building work failing to comply with the building code.[8] To date, MBIE has issued one warning (for loop bars in April 2018) and one ban (for foil insulation in July 2016).

CodeMark certificates state that a product or method complies with the building code

The *Building Act* also provides for voluntary product certification schemes. There is currently one scheme in operation, CodeMark. Under CodeMark, a building product or method is evaluated to determine whether it complies with the building code. Products or methods with a CodeMark product certificate must be accepted by BCAs as being compliant with the building code if the product is specified for use in building work, and installed as set out in the information on the certificate. (See 'Strengthening CodeMark', page 26.)

6 *Building Act*, section 362N.

7 *Building Act*, section 362T and Regulation 9, *Building (Residential Consumer Rights and Remedies) Regulations 2014.*

8 *Building Act*, section 26.

Building product regulation has gaps and disincentives

Product information often lacks clear detail on the product's performance

New Zealand needs buildings that are safe and durable. Buildings must comply with the building code, and high-quality product information is key.

Designers and builders rely on good product information when making design and installation decisions. BCAs rely on product information to understand how it will affect the performance of the building when assessing it against building code requirements.

Product information often lacks important details

We understand that building product information often lacks the detail that designers and builders need when specifying and using products. Stakeholders have told us that product information is often marketing material that doesn't include information on performance, code compliance, installation or maintenance requirements.

Poor quality product information slows down the consent process

The consent process can be slowed down when BCAs don't have the information they need to assess a building consent application. Data from seven BCAs indicates that when requests for information were made about the products being used, consents were placed on hold for an average of 21 working days until information was received.[9]

Manufacturers and suppliers have disincentives to provide product information

Information gaps have arisen from a lack of system incentives for suppliers to provide information on building products. The *Fair Trading Act 1986* and the *Building Act* make a manufacturer or supplier liable for the accuracy of information provided about a product. This can create a disincentive to provide information because there is no penalty for failing to provide information under either the *Fair Trading Act* or the *Building Act*.

9 A BCA must make a decision on a building consent application within 20 working days of receiving it. If the BCA requests information from the applicant, however, this deadline can be suspended until the information is provided.

The roles and responsibilities for building products and methods are not clear

Responsibilities are implied rather than clearly set out

Stakeholders have told us that the responsibilities of manufacturers, suppliers, designers and builders for building products and methods are not clearly set out in legislation. Instead they're implied through their relationship to building work. For example, requiring building work to be code compliant implicitly means that the products that go into building work should also be code compliant.

Clear roles and responsibilities would make it easier for people to do their job and enable a fair allocation of risk and liability.

It's common practice to substitute products without applying for a variation

BCAs have told us that building products and methods specified in building consents are often replaced with other products or methods (substitution) without an application to vary the consent (a variation).

Substitutions are often legitimate. For example, substituting one product for another may avoid delays due to availability of materials. But BCAs must be told about any variations to the consent. This provides a check to ensure the building will continue to comply with the building code. A minor variation may only require an informal change to the consent, but BCAs still need to be told about it. BCAs may not be able to spot substituted products when they inspect a building.

MBIE has to rely on voluntary cooperation when we investigate a building product or a building method

When MBIE investigates the performance of a building product or method, we rely on the voluntary cooperation of manufacturers and suppliers. MBIE has no powers to compel a person to provide information or produce documents, such as the results of product testing. Without this information, it may be impossible to decide whether to issue a warning or ban.

Lack of information has forced us to delay investigations or put them on hold.

MBIE proposes seven changes to building product regulation

1. Widen the purpose of the *Building Act* to include the regulation of building products and methods.
2. Provide clear definitions for 'building product' and 'building method'.
3. Require product manufacturers and suppliers to supply information about their building products. Set minimum standards for that information. This does not apply to building methods
4. Clarify responsibilities of manufacturers, suppliers, designers and builders for building products and building methods.
5. Give MBIE the power to compel information to support an investigation into a building product or method.
6. Strengthen the framework for product certification for both products and methods.
(See page 26.)
7. Enable a regulatory framework for modern methods of construction, including off-site manufacture. (See page 32.)

The objectives of these changes are to:

- increase the quality of information on building products
- allow people to be held accountable for building products and methods and their use
- reduce the risk of defects in building work.

1. Widen the purpose of the *Building Act*

Proposal

Widen the purpose of the *Building Act* to include the regulation of building products and building methods.

Including building products and methods in the *Building Act* would recognise their role in building performance

The current purpose of the *Building Act* is to regulate building work, license building practitioners and set performance standards for buildings.[10]

The current purpose doesn't adequately recognise the impact building products and methods have on the performance of buildings. Including the regulation of building products and methods in the purpose of the *Building Act* would reflect the key role they play in building work. It will reinforce the shift from regulating building work, to regulating both building work and the products and methods used in that work.

Questions for stakeholders

2.1	Do you agree with expanding the purpose of the *Building Act* to include the regulation of building products and methods and their use?

2. Clearly define 'building product' and 'building method'

Proposal

Include the following definitions in the *Building Act*:

- A 'building product' is any component or system that could be reasonably expected to be incorporated into building work. A system is a set of at least two components supplied and intended to be used together to be incorporated into building work.
- A 'building method' is a specific way of using a product or system in building work.

Defining 'building product' and 'building method' would clarify what is regulated under the *Building Act*

The current definition doesn't distinguish between a building product and a building method. The *Building Act* only uses 'building product and method' in relation to products that have a CodeMark. We propose separate definitions for building products and building methods.

10 *Building Act*, section 3.

Current definition of 'building method or product' under the *Building Act*

Section 7: building method or product has the meaning given to it by section 20.

Section 20: Regulations may specify that there is only 1 means of complying with building code

(2)(c) Building methods, methods of construction, building design, or building materials (building methods or products) that have a current product certificate issued under section 269.

Section 269: Certification of building methods or products: Issue of product certificate

(1) A product certification body must issue a product certificate if it is satisfied that a building method or product that is the subject of an application under section 268 meets the prescribed criteria and standards for certification.

(2) A product certificate must state whether there are any matters that should be taken into account in the use or application of the building method or product, and if so, what those matters are.

Clearer definitions would allow for innovation

The definitions need to be sufficiently broad to allow for new technologies and building methods in the future. Components and buildings produced through modern methods of construction (MMC) such as off-site manufacture would fall under the definition of 'building product'. See *Modern methods of construction*, page 32 for more information).

Questions for stakeholders

2.2	Do you agree with the proposed definition of 'building product'?
2.3	Do you agree with the proposed definition of 'building method'?
2.4	Do these definitions provide sufficient scope to account for new and emerging technologies?

3. Set minimum standards for information about building products and require manufacturers and suppliers to supply that information

Proposal

Product manufacturers and suppliers (including importers) must provide information about building products that is publicly accessible.

Set minimum information requirements for building products (through regulations).

Minimum standards for information would only apply to building products

We propose to require product manufacturers and suppliers to provide product information about their building products. This requirement would only apply to building products. It would not apply to building methods.

Manufacturers and suppliers would be required to make product information publicly accessible. For example, product information could be provided with the product or be easily accessible on the manufacturers' website.

This approach will allow for alternative ways of making product information publicly accessible. We consider that there is little benefit to requiring information to take a specific form, and it may create new compliance costs for manufacturers and suppliers.

Regulations would specify the minimum level of product information

The proposed minimum requirements are outlined in Box 1.

Many product manufacturers and suppliers already provide information beyond the proposed minimum standards. There is no intention to encourage these groups to reduce the level of information they supply. Rather, it aims to create a level playing field where all manufacturers and suppliers provide a consistent minimum level of product information. It will also give other parties in the system – designers, builders, BCAs – the information they need to carry out their responsibilities.

It would be an offence to fail to provide the minimum level of information

It would be an offence if manufacturers and suppliers fail to make the minimum level of product information publicly accessible. The penalty for this would be a notice to fix, an instant fine (infringement notice) or a court-ordered penalty. The provisions under the *Fair Trading Act* would continue to apply to the accuracy of the information provided.

This proposal would not apply to discontinued products or products no longer for sale and supply in New Zealand when the new requirements come into force. Requiring suppliers to make information publicly accessible for discontinued projects would be unnecessarily onerous.

BOX 1

Proposed minimum information requirements for building products

a. Description of the product	The description may include the product's name, a picture of the product, a unique identifiable code and the date the product information was produced. The product description must be sufficient to avoid it being mistaken for other similar products.
b. Details of the manufacturer/ supplier, including contact details	For imported products, this would be the details of the importing supplier and the retailing supplier. For products manufactured in New Zealand, this would be the details of the manufacturer and the retailing supplier. These details are needed so that people can contact the manufacturer/ supplier if they require any further information or a problem arises with the product.
c. Scope and limitations of use	This is a statement on the building product's scope and limitations. Some products have specific and defined uses, while others may have multiple uses. The scope of use would consider factors that may affect the performance of the product within a building system, including consideration of loading, exposure to fire and exposure to weather.
d. Design and installation requirements	Any information required to ensure that designers correctly specify the product's use (eg required locations or integration with other building products) and builders can install the product correctly.
e. Maintenance requirements	Any work that must be carried out to ensure the product continues to perform as expected once installed. This must include a statement about the expected durability of the product.
f. Declaration if a product is subject to a warning or ban	If the product is subject to a warning or ban under section 26 of the *Building Act*, a declaration about this warning or ban must be included in the product information.

Questions for stakeholders

2.5	Do you support the proposal to require manufacturers and suppliers to supply information about building products?
2.6	**For designers, builders and building consent authorities:** Will the proposed minimum information requirements for building products help you make good decisions about products?
2.7	**For designers, builders and building consent authorities:** Do you need any other information to help you decide whether a building product will result in building work that complies with the building code?
2.8	**For manufacturers and suppliers:** How closely do the proposed minimum information requirements reflect what you already provide?
2.9	**For manufacturers and suppliers:** Will there be an impact on your business to provide the proposed minimum product information for your products?
2.10	**For manufacturers and suppliers:** What is your estimated cost increase? Please include any relevant information on how you calculated your estimate (eg the number of products you produce or supply).

4. Clarify the responsibilities of manufacturers, suppliers, designers and builders for building products and building methods

Clear roles and responsibilities are important

Clear roles and responsibilities set out what's expected of each participant in the building system – and what will happen if they fail to meet these expectations.

Proposal

Create an explicit responsibility on manufacturers and suppliers to ensure that a building product is fit for its intended purpose.

The proposed change would make it clear that manufacturers and suppliers are responsible for building products being fit for purpose

Consumer protection law states that manufacturers and suppliers are responsible for ensuring that consumer goods are fit for purpose. Consumer law may cover building products in some, but not all, circumstances.

We propose to include in the *Building Act* an explicit responsibility on manufacturers and suppliers to ensure that building products are fit for their intended purpose. This responsibility would apply to all products that could reasonably be expected to be incorporated into residential or commercial building work. The responsibility isn't intended to apply to building methods.

Building owners would be able to seek redress through the courts if building products are not fit for purpose.

Manufacturers and suppliers should be held accountable if the product fails due to the way the product was designed or manufactured. Manufacturers and suppliers should not be held responsible for a product if it solely fails because it was:

- used in a way that is outside its intended use
- installed incorrectly.

Proposal

Clarify that builders cannot use a different building product or building method to the product or method specified in the building consent without an appropriate variation to the consent.

The proposal would make it clear that BCAs must be told about product or method substitutions

The building owner is responsible for obtaining the building consent, and appropriate variations to the consent if any are needed. An example of a variation is substituting comparable products, such as substituting one internal lining for a similar internal lining. 'Un-notified' product substitution can result in buildings that don't comply with the building code and can cause serious building defects that may need significant remedial work at the expense of building owners.

Builders are responsible for ensuring that building work complies with the building consent. Any change made to the consented plans is a variation and requires approval from a BCA. Owners are often unaware, however, that a product or method has been substituted or that a variation is needed. BCAs have told us that it's common for product substitution to happen without them being told.

There are two types of variations to a building consent; minor and major.

Minor variations are defined in the *Building (Minor Variations) Regulations 2009* as: 'a minor modification, addition or variation to a building consent that does not deviate significantly from the plans and specifications to which the building consent relates'. Minor variations require informal amendments to the consent file. This may include amended drawings or updated site record information.

A major variation to the consent, such as changing an entire cladding system, must be made as if it were an application for a new building consent and will result in a formal variation to the exisitng consent.

Existing guidance provides a framework for BCAs to consider whether variations are minor or major. We propose to clarify that, where the variation requires a formal variation to the existing consent, builders are not able to substitute a product or method until the variation has been issued.

At this stage, MBIE is not proposing to change the process to vary a consent.

However, MBIE is interested in feedback about:

- the current threshold for minor vs major variations
- the process to apply for a variation.

It's intended that builders would discuss any potential product or method substitutions with the designer[11] and building owner. The building owner, or the builder on their behalf, would then apply for the appropriate variation to the consent before the substitution takes place.

Offences and penalties are in place for carrying out building work that does not comply with the consent. This change would clarify that substituting products or methods without a variation on the building consent, where one is needed, would be captured by those offences. These include a fine for the breach and a notice to fix to ensure compliance of the building work. Substituting a building product or method without a variation to the consent could also be reported to the appropriate occupational regulation body to investigate.

Proposal

Clarify the responsibilities of builders and designers to ensure that the building products and methods specified or used will result in building work that complies with the building code.

Builders and designers would have clear responsibilities for building products

We propose to amend the existing responsibilities for designers and builders, set out in sections 14D and 14E of the *Building Act*, to include responsibilities for building products and methods.

Designers' responsibilities could include: 'ensure that the building products and methods specified result in building work that complies with the building code (where the work is properly completed in accordance with the plans)'.

Builders' responsibilities could include: 'ensure that the building products and methods used result in building work that complies with the building code and the products and methods specified in the consent'.

The proposal clarifies existing responsibilities – it does not create new liabilities

This proposal is intended to better clarify the existing responsibilities of builders and designers for building products and methods. It's not intended to create any new liabilities or add to the existing common law liabilities. It's not intended to provide any new penalties or alter the existing enforcement mechanisms should the building work not comply with the building code.

Questions for stakeholders

2.11	Do you support the proposals to clarify roles and responsibilities for manufacturers, suppliers, designers and builders?
2.12	Is the current threshold and process for variations appropriate for all circumstances?

11 Where the designer is still contracted as part of the building project.

5. Give MBIE the power to compel information to support an investigation

Proposal

For building products and methods, provide MBIE's chief executive with the power to require a person, by written notice, to provide information, product documents or both if:

- the chief executive has cause to consider issuing a warning or ban under section 26 of the *Building Act*
- the information is necessary to make that decision
- the information to inform this decision is not readily or publicly accessible.

Provide MBIE with the ability to share that information with other regulators.

MBIE currently relies on voluntary cooperation during investigations

MBIE's role as steward of the building regulatory system relies on its ability to confidently execute powers under the *Building Act*. The powers to warn or ban are a key mechanism for regulating building products and methods. Yet, being unable to compel information during an investigation limits our ability to exercise such powers.

This proposal would give MBIE the power to require people or companies to provide us with information to inform an investigation into building products and methods. MBIE also proposes to share that information with other regulators if there is evidence that another act or regulation has been breached. For example, if MBIE discovered evidence that a manufacturer or supplier had made a false or misleading statement about a building product or methodon; it would be desirable to share that information with the Commerce Commission so it could investigate potential breaches under the *Fair Trading Act*.

It would be an offence not to comply with a request for information

Failing to supply information on, or hindering an investigation into, a building product or method would be an offence.

The penalty would be an instant fine (infringement notice) or a court-ordered penalty. The amount of the penalty would align with similar offences in the *Building Act*.

Questions for stakeholders

2.13	Do you support the proposal to give MBIE the power to compel information to support investigations?
2.14	Would MBIE's ability to compel information about building products or methods and share this with other regulators have unintended consequences? If so, what might these unintended consequences be?

How the proposed changes measure up to our five assessment criteria

Does the proposal meet the objectives for building products and methods?

The proposed changes are intended to improve the regulation of building products and methods and allow for better decision-making and, in turn, improve the quality of building work. The proposals meet the four objectives for building products by:

- making clear the roles and responsibilities for building products and methods
- making it easier to hold people accountable
- helping to provide greater confidence to all the participants in the building system about the performance of building products
- being designed in a way that allows for flexibility and addresses the most urgent gaps in the regulatory settings where evidence shows that changes are needed.

Does the proposal support the desired behavioural shifts in the building sector?

The proposals support the desired behavioural shifts in the building sector by increasing the information needed to support good decision-making and creating offences that reinforce roles.

They would send a clear signal about the important role building products and methods play in how buildings perform, and clarify the responsibilities of manufacturers, suppliers, designers and builders.

The requirement for product information would provide consistent information on all building products.

Would the benefits of the proposal outweigh the risks and costs?

Further work is needed to quantify the costs and benefits of the proposals. Our initial assessment is that improved efficiencies would likely offset any cost increases. The requirements proposed to be placed on manufacturers and suppliers are designed to minimise any increased costs or barriers to new building products entering the market. The proposals would support more efficient consenting processes, as BCAs would need to make fewer information requests.

The new requirements to provide product information and ensure a product is fit for purpose may be tested through the courts. Parties who are involved in court cases may face additional costs in the short to medium term as the law is clarified. Two possible court-case scenarios are:

- a dispute about whether a product is a building product
- a dispute about the factors that contributed to the failure of a building product.

Is the proposal consistent with other elements of the building regulatory system?

The focus on providing clear roles and responsibilities and filling information gaps is consistent with other parts of the building system legislative reform programme.

The proposals will help people manage risks and make it clear who is accountable. They also let BCAs rely on others to play their part in the system.

Is the proposal consistent with related government policy and regulations?

The proposals are consistent with other government policies, such as the commitment to improve housing, by ensuring building products and methods contribute to the construction of safe and durable homes for New Zealanders.

Potential impacts of the proposed changes

Manufacturers and suppliers

Increased regulation. This increase is intended to create a level playing field for manufacturers and suppliers. Regulation would clarify their responsibilities and provide a way to hold them accountable.

Consistent product information may make people more aware of a product's competitive edge – and incentivise the production and supply of quality building products.

Manufacturers and suppliers may face increased compliance costs that they then pass on to consumers. Allowing for flexibility in how information is provided would allow manufacturers and suppliers to find the most appropriate and cost-efficient way to provide that information. Such flexibility would also let them take advantage of new technology that enables innovative ways to provide product information.

Suppliers who import products may need to undertake greater due diligence of manufacturers to ensure that they have the product information they need and can be confident that the product will perform as the manufacturer claims.

Designers

Easy access to the product information they need when designing buildings. This would enable informed decisions on what products to use and how to use them with other products. Designers would know any limitations on a product's use (including any warning or ban on its use). Designers would also know what their existing responsibilities are in relation to building products and methods. The proposed changes are expected to reduce inefficiencies in the design process because more information will be available to designers. Designers may become more risk averse when choosing building products if there is uncertainty about how that might impact on their liability or insurance.

Builders

Easy access to the product information they need would make it easier to install building products correctly. They would also know what their existing responsibilities are in relation to building products and methods and could be held to account if they fail to adequately fulfil their roles and responsibilities. The proposed changes are expected to reduce building inspection failures or instances where remediation of work is required.

Building consent authorities (BCAs)

Easy access to product information when assessing an application for a building consent. They should see more applications to vary consents because the responsibilities for getting a variation for product substitutions would be clearer. The proposed changes are expected to reduce inefficiencies in the consenting and inspecting processes.

Building owners

Easy access to product information would help them to maintain their buildings. They should have greater confidence that those involved in building work have made good decisions about the products used. It's intended that building owners would be able to seek redress from manufacturers and suppliers if their products are not fit for their intended purpose. However, it may be hard to prove that a defect was the result of a faulty product rather than some other factor.

MBIE

Increased role in enforcing building products and methods. We would have access to the information we need to make decisions on the performance of a building product or method. Increased complaints about the quality of products and the accuracy of product information.

Occupational registration bodies

Allow them to hold designers and builders accountable for their work with building products and methods.

Questions for stakeholders

2.15	Do you think the impact of the proposed changes to the regulation of building products and building methods would be positive or negative? What do you think the impact might be?
2.16	How do you think the proposed changes to the regulation of building products and building methods would change how you and your business/organisation operates?

A two-year transition period for product information, six months for other proposed changes

Regulations would need to be put in place setting out the minimum requirements for product information. Manufacturers and suppliers would need time to produce product information that meets these requirements. We consider that a two-year transition period is needed. This period would commence once the regulations are in place. We're interested to get your feedback on the proposed length of this transition period.

We consider that the proposed changes to roles and responsibilities and the power to require information don't need a long transition period. We propose that these changes should come into force six months after the legislation is amended.

The changes would be supported by information and education campaigns to ensure manufacturers, suppliers, designers and builders are aware of the new requirements.

Questions for stakeholders

2.17	How long do you think the transition period for product information needs to be to ensure manufacturers and suppliers are prepared for the changes?
2.18	How long do you think the transition period for the changes to responsibilities needs to be so that people are prepared for the changes?
2.19	If the clarified roles and responsibilities came into force before the minimum requirements for product information, what would be the impact?

Options we considered but don't recommend

A minimum level of product assurance

MBIE has no evidence to justify requiring a minimum level of product assurance (that is, third-party testing) for particular types of products. Different levels of assurance are needed depending on the complexity of the products, their use and the types of testing they have undergone.

We consider that the requirement that building products are fit for their intended purpose would provide sufficient incentives for manufacturers and suppliers to undertake appropriate levels of assurance for that particular product.

Mandating assurance for particular products on an individual basis

We considered introducing the power to require mandating a particular level of assurance if an investigation identified a systemic issue with a particular product group. The risk associated with a product depends on the use of a product within building work, in the context of the performance requirements of that building, and should not be applied to a generic class of products. For example, requiring all cladding products to have some level of assurance, irrespective of use, would impose compliance costs that are difficult to justify.

We consider MBIE's existing powers to issue guidance, and warnings and bans, are sufficient to manage risks to the specification and use of building products and the code compliance of building work. The proposed power to compel information would enable MBIE to use warnings more often.

A national register or database of building products

Product databases for building products already exist in New Zealand. The cost of setting up and maintaining a government-led product register is significant. Further, no evidence suggests any wider benefits from doing so.

The proposal to require minimum information about building products would support good decision-making about products and support greater consistency and expansion of existing databases.

A requirement to pass on information about a building product

Queensland recently introduced a requirement to pass building product information down the building product supply chain. We don't propose to introduce a similar requirement at this time.

We consider that the requirement for public access to product information means that everyone would be able to easily access it. This access mitigates the need for passing on that information.

Strengthening the framework for product certification

A voluntary certification scheme that relies on accredited product certification bodies

MBIE has a voluntary building product certification scheme that was jointly established with Australia in 2008. This scheme (currently known as CodeMark) has operated separately in New Zealand since Australia established CodeMark Australia in 2016. This scheme includes both building products and methods.

MBIE appoints a Product Certification Accreditation Body (PCAB), currently JAS-ANZ, to undertake accreditation and audits of Product Certification Bodies (PCBs) against standards and criteria set out in the *Building (Product Certification) Regulations 2008* (the 2008 regulations).

BCAs must accept that building products with a CodeMark certificate comply with the building code

A product manufacturer or supplier can apply to an accredited PCB to have their product or method evaluated. The PCB evaluates the product or method against the standards and criteria set out in the 2008 regulations. The requirements for the content of product certificates are also set out in the 2008 regulations.

If a PCB believes a product or method meets these criteria it can issue a product a CodeMark certificate.

BCAs must then accept that the product or method complies with the building code, as long as it's installed according to the information on the certificate.

Roles and responsibilities in the CodeMark scheme

The table lists the expected actions of each participant in the CodeMark scheme. That participant is also responsible for its listed actions.

Scheme owner	**MBIE administers CodeMark in New Zealand and maintains the online product register** ■ Administer CodeMark in New Zealand. ■ Maintains an online public product register listing all current CodeMark certificates.
Product certification accreditation body	**The PCAB accredits and audits product certification bodies** ■ Accredits product certification bodies in line with the standards and criteria set out in the *Building (Product Certification) Regulations*. ■ Audits product certification bodies once a year (or more often if required).

Product certification body	**Six product certification bodies operate in New Zealand** ■ Evaluates products and methods against the building code. ■ Issues and audits product certificates. (Note: The PCAB has suspended one product certification body; another no longer accepts new applications).
Certificate holders	**Certificate holders must comply with the product certificate** ■ Ensure their product or method complies with the product certificate (and the building code). (Note: As at 1 February 2019, 176 CodeMark certificates are on the certificate register).
Building consent authorities	**69 BCAs issue building consents** ■ Accepts a CodeMark product or method as code compliant if the product or method is specified for use and installed correctly. ■ Ensures building work as a whole is compliant with the building code.

An effective product certification scheme has a key role in the building regulatory system

Product certification provides a compliance pathway for building products and methods that can lead to more efficient consenting applications. Manufacturers can demonstrate to BCAs and potential users that, when used as specified, a product or method will be code compliant. Product certification is suitable for any building product but is particularly beneficial to manufacturers and suppliers of products and methods that are innovative, new to the market or would have serious consequences if they failed.

MBIE doesn't have the tools we need to be an effective scheme owner

MBIE doesn't have the tools needed to ensure that the product certification scheme is fit for purpose. MBIE can't give stakeholders confidence that certified building products or building methods will perform as stated on their certificates.

This situation is the result of several factors:

- MBIE is unable to set new rules for the product certification scheme, even though existing rules are no longer fit for purpose.
- MBIE is unable to set the policies, procedures and systems that a PCB must have to adequately assure products and methods and their compliance with the building code.
- An accreditation process that doesn't fully assess whether a PCB is competent to assess a product and methods across all aspects of the building code.
- A legislative and regulatory framework that lacks a clear and structured process for taking timely action to address poor performance and poor quality product certificates.
- Product evaluations that are inconsistent and of variable quality.
- Poor quality certificates can be registered despite containing errors.

Overall, MBIE's powers and role under the current legislative framework is too narrow and passive to improve the scheme. The *Building Act* doesn't enable us to act in a way that is consistent with good practice as a regulator. We don't have the powers we need to take action against poorly performing PCBs or certificates of poor quality.

Once the PCAB accredits a PCB, the chief executive must enter the PCB on the PCB register. It's good practice for the regulator to control the register for schemes like CodeMark. They're best placed to understand the regulatory intent of the scheme. Under current settings, a PCB can issue product certificates as soon as the PCAB accredits the PCB and MBIE has little power to intervene in the process.

The existing regulation-making power in the *Building Act* only enables regulations to specify standards and criteria that PCBs must apply in determining applications for a product certificate. This is a narrow power, and doesn't enable regulations to clearly establish performance standards (including having procedures, policies and systems in place) that PCBs must meet to carry out product evaluations.

MBIE is responsible for maintaining the product certificate register. Yet, the grounds for suspending or revoking a product certificate are limited. For example, existing legislation doesn't let us suspend a certificate with errors in it, or require that those errors are resolved. Further, a certificate has no expiry date and can remain valid as long as a PCB audits it each year.

Under the current legislative settings, MBIE is not authorised to make new rules that set out expectations for the processes the PCAB and PCBs would follow to carry out their tasks and that govern the interactions and information flows between us, the PCAB, PCBs and certificate owners.

Proposed changes to the product certification framework

MBIE commissioned Deloitte to review CodeMark in 2016. They made several recommendations to both improve the way the scheme operates and the way we manage it. We've responded to those recommendations by improving our monitoring of the scheme. The government has also agreed to changes to the existing regulations that set accreditation standards for PCBs and the content of product certificates. These changes are intended to come into effect in 2019. The proposals in this discussion paper address the remaining recommendations, which require legislative amendments to progress.

MBIE is responsible for how CodeMark performs and should manage it consistently with the principles of good regulatory stewardship. Good practice for a regulator includes, for example:

- ensuring strong monitoring and oversight arrangements to ensure effectiveness, efficiencies and accountability in the way that the scheme operates
- maintaining public confidence in product certification
- having coherent risk-based processes and clear roles and responsibilities
- ensuring effective enforcement and intervention to make sure that the scheme operates and works as intended.

6. Strengthen MBIE's role as the product certification owner and regulator

Proposal

Allow for regulations to set requirements on product certification bodies and for the accreditation and registration of product certification bodies.

Allow for regulations to set out the process and requirements for registering a product certificate.

Allow MBIE to set rules for the interactions between participants in the product certification schemes.

Provide MBIE with the powers needed to administer the registers of product certification bodies and product certificates.

As the owner and regulator of product certification schemes, MBIE should be able to:

- specify the policies, procedures and systems a PCB should have
- assess whether PCBs are operating as intended under the *Building Act*
- ensure that the quality of certificates is maintained.

We propose to amend the *Building Act* to enable regulations to prescribe:

- the process and requirements for applying to us for registration as a PCB
- the requirements for maintaining registration as a PCB
- the process and requirements for registering a product certificate
- the policies, procedures and systems that PCBs must have in place
- the qualifications and competencies of those in technical roles.

In addition, MBIE would gain the power to:

- make rules that govern the interactions between the PCAB and PCBs, PCBs and product certificate owners, and PCBs and external contractors
- suspend or revoke a PCB's registration if it no longer meets the requirements of being registered
- decline to register, suspend or revoke a product certificate that has errors (including if the certificate was issued incorrectly).

The proposals would not change the role of the PCAB in accrediting and auditing PCBs. They would, however, provide MBIE with the ability to set out what the PCAB must examine when accrediting and auditing a PCB.

Enabling more active management of the scheme would enable us to be an effective scheme owner. The following table shows potential changes to requirements placed on different parties in the scheme. The scheme's rules and regulations would set out these requirements.

Proposed roles and responsibilities in the product certification schemes

The table lists the expected actions of each participant in the product certification schemes. Each participant is also responsible for its listed actions.

Registration of PCBs	The PCB: ■ is accredited by the PCAB ■ meets the fit and proper person test ■ declares the scope of the certificates they can issue ■ meets minimum competency requirements ■ has liability cover ■ notifies who will be signing certificates ■ meets specified reporting requirements ■ does not bring the scheme into disrepute.
Registration of certificates	The certificate: ■ is completed as set out in the 2008 regulations ■ references the correct building code clauses for the intended use of the product ■ describes clearly the intended use of the product or method ■ fits within the intent of the product certification scheme.
Policies, procedures and systems	Policies and procedures are in place to: ■ identify and maintain staff technical competence requirements ■ facilitate the bringing in of contractors or other technical experts, as needed ■ handle complaints ■ evaluate products, including identifying external resources where necessary ■ train staff. Systems are in place to record decisions and the reasons for those decisions.
Rules	Rules are in place to: ■ govern the interaction between the PCAB and PCBs ■ govern the interaction between PCBs and certificate owners, and PCBs and external contractors ■ prescribe the processes that the PCAB and PCBs must follow in carrying out their activities.

Potential impacts of enacting these proposals

These proposals should give stakeholders greater confidence in the quality of product certificates.

The proposed changes would enable us to set clear processes and procedures that PCBs must follow. In turn, this would enable us to hold PCBs accountable if they don't operate as intended.

The proposed requirements for PCBs, such as minimum competency requirements and ongoing staff training, should improve the quality of product evaluations and decision-making about whether to certify a product or method.

With the proposed requirements, we would be better placed to intervene to manage potential risks to the scheme, in the event that poor quality or inappropriate product certificates are issued.

The proposals would place more requirements on PCBs. This increased burden may reduce the number of PCBs willing to operate under the scheme.

PCBs would need to ensure that appropriate policies and procedures are in place to meet the new requirements, which may incur costs if they need to develop new policies and procedures. These costs would likely be passed on to product manufacturers or suppliers applying for product certificates. MBIE is also likely to incur higher costs, through the need for additional resourcing to effectively monitor the scheme.

Questions for stakeholders

2.20	**For product manufacturers and suppliers:** Would the changes proposed to the framework for product certification make product certification a more attractive compliance pathway for your products?
2.21	**For designers:** How would the proposed settings to the framework for product certification impact your product or method specification in building designs?
2.22	**For building consent authorities:** Would the changes to the product certification scheme's settings increase your confidence that a product or method with a product certificate will perform as intended?

Enabling a regulatory framework for modern methods of construction, including off-site manufacture

Modern methods of construction (MMC) can increase productivity in the building and construction sector

Building work is not always done by people on a building site

The building and construction industry is innovating by making use of manufacturing technology and processes to increase its productivity. This approach is referred to as modern methods of construction (MMC). MMC includes activities like off-site manufacturing of panels, pods, or whole buildings. It can also include manufacturing processes that happen on a building site, like using a brick-laying robot or a concrete 3D printer. We need to future-proof the building regulatory system to recognise what makes MMC special and to ensure we're not placing unnecessary regulatory barriers on it.

MMC processes are closer to manufacturing methods than traditional building work

These processes use automation, technology and assembly-line methodology. Components and buildings produced using modern methods of construction can be seen as both building products and building work.

MMC processes can create parts of buildings – or even complete buildings – in a factory or on a building site. Examples include:

- panels made in a factory and then assembled into a building on site
- bathroom pods made in a factory and then integrated into a hotel on site
- precast concrete and steel elements based on an architect's design for an office building fabricated off-site by a manufacturer and then integrated into construction
- complete houses 3D printed on-site using concrete.

The consenting process doesn't acknowledge the unique properties of MMC

Consenting processes still treat MMC like traditional building work

The current consenting system isn't very clear about how to treat the things about MMC that are different from traditional building work. MMC tends to use processes that are precise, repeatable and consistent. This is how MMC delivers productivity gains. It can also mean that each product can reasonably be expected to be produced to the same quality as the previous product. Despite this, MMC manufacturers who follow industry best practice, and use robust quality assurance (QA) systems that ensure that each component is compliant and manufactured correctly, are still required to give BCAs assurance of the compliance of their work every time.

The *Building Act* requires BCAs to make 'reasonable grounds' judgements about compliance. For traditional building work, BCAs are able to rely on in-person site inspections. For MMC, in-person inspections are impractical. BCAs can't always see inside MMC as the manufacturing work is often done far from the eventual installation site, and items like wall panels may be closed by the time they arrive on site.

BCAs are allowed to base their judgements on a range of mechanisms used by other parties, but different BCAs vary on what they will accept. These other assurance mechanisms, like CodeMark or producer statements, are required for each individual product, even when the process producing all the products is the same and a robust QA system is in place.

Many other countries have certification schemes that allow manufacturers to demonstrate the quality of their manufacturing and QA processes to a third-party certifier, who performs random audits. The manufacturer is then entitled to attach a sticker to their work that BCAs must accept as meaning the work will comply with the building code.

Roles and responsibilities for MMC can be unclear

Proposal 4 from the previous section of this document, 'Clarify the responsibilities of manufacturers, suppliers, designers and builders for building products and building methods', would apply to MMC. It would make it clear that manufacturers and suppliers are responsible for building products being fit for purpose, including products produced using MMC.

Because MMC can produce complex products that fall under the definition of 'building work' as well as that of 'building product', sometimes roles and responsibilities are unclear. For example, someone manufacturing an entire house in a factory setting could be seen both as the 'product manufacturer' and as a 'builder' doing building work. These roles hold different responsibilities.

Consenting processes for MMC can be unclear and inconsistent

Because the production of a full building is seen as 'building work' under the *Building Act* even when it occurs in a factory environment, some manufacturers report that two building consents are being required for the same building – one in the region where their factory is, and another where the building is going to be installed on site.

The treatment of MMC across BCAs varies significantly, making it difficult for manufacturers and people seeking to use MMC-produced components to get clarity about what they should do to demonstrate compliance, or certainty that their building work will be consented.

This lack of clarity, consistency and certainty can limit the viability of MMC in New Zealand, and add time and costs for building owners.

7. Enable a regulatory framework for MMC, including off-site manufacture

Proposal

Amend the *Building Act* to enable a regulatory framework that would future-proof the building regulatory system for MMC. Features of this framework include:

- enabling a manufacturer certification scheme for repeatable manufacture processes used to produce building work
- clarifying what roles and responsibilities for MMC will be when the new framework is in place
- minimising duplication of effort by:
  - not requiring two consents for the same building work
  - considering whether to require BCAs to accept each other's consents and Code Compliance Certificates.

Proposals that will enable a regulatory framework for MMC

MBIE proposes to enable a regulatory framework for MMC. This is intended to help future-proof the building regulatory system by providing clarity about how MMC should be treated and ensuring there are clear compliance pathways that work well for MMC.

These proposals are intended to take an enabling approach in legislation. The proposals outlined in this section are still being developed; they seek feedback on the core design elements of a regulatory framework for MMC. This will enable us to work with the sector to design the elements in more detail.

Enabling a manufacturer certification scheme would allow for a way to certify the repeatable processes used in MMC

MBIE proposes to amend the Building Act to allow regulations that provide for a voluntary manufacturer certification scheme. This scheme would be designed specifically for MMC, with a focus on assuring the robust processes and quality assurance that the manufacturer uses for all of its products.

Unlike guidance, product technical statements or producer statements, the manufacturer certification would be 'deemed to comply', meaning all BCAs would be legally required to accept all the work covered by the certification as compliant, every time. Unlike CodeMark, the manufacturer certification would be specifically intended to cover everything a manufacturer produced with just one certification – this is because it would be focused on assuring the robust processes and quality assurance that the manufacturer uses for all of its products, rather than checking each product.

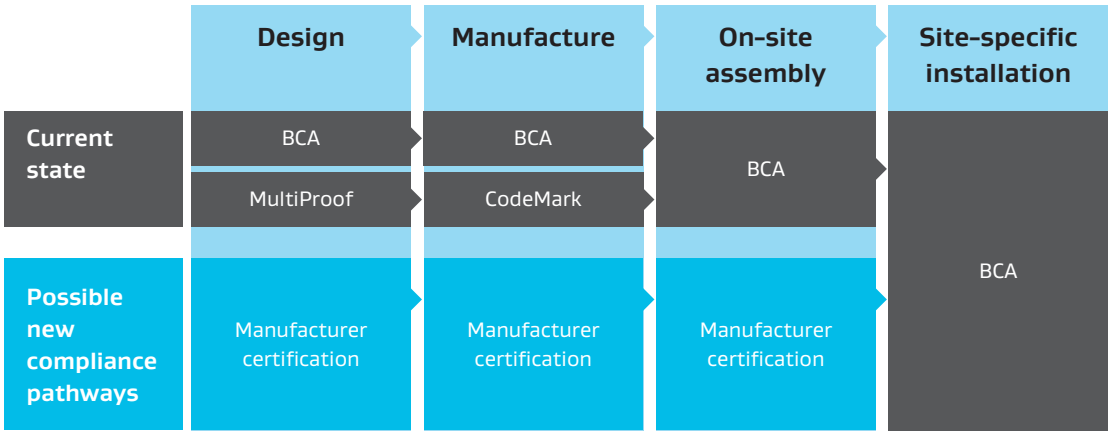
Based on similar overseas schemes, the features of the scheme are likely to include:

- checking of processes and QA by an accredited third-party certifier to determine eligibility for certification
- audits by a third party to ensure processes and QA are being consistently followed
- the ability for certification to be revoked based on unsuccessful audits or concerns about compliance.

For manufacturers who design and manufacture entire buildings, the scheme may also be able to certify the compliance of the designs, as well as their construction in accordance with designs and in compliance with performance requirements. This would mean that the BCA's checking would be focused only on the site-specific elements of the build that were not covered by the certification – foundations, for example.

Like with CodeMark, certification would be by an accredited third party – however, the third party would need to have specific expertise in certifying MMC processes. This is a different skill-set from most current Product Certification Bodies. MBIE will do further work to determine the accreditation requirements for a third party certifier.

The diagram below shows the existing pathways for MMC, and the possible new ones, across the stages of the building process:



Clear roles and responsibilities would support better consenting for MMC

We propose to do further work to clarify the roles and responsibilities of parties to the building process for MMC, once the new regulatory framework was in place.

Clear roles and responsibilities would help give manufacturers, builders and building owners clarity and certainty on when and how they need to show that MMC products and buildings comply with the building code.

MBIE will investigate how to minimise duplication of effort in consenting for MMC

We have identified that there are some situations where effort is being duplicated – for example, where a consent is being required for a building in the region where it is manufactured, and then again in the region where it is installed. We intend to develop options to minimise this duplication of effort. This could include requiring BCAs to accept each other's consents for the same design or building work.

This would include accepting a Code Compliance Certificate issued by a different BCA. For example, bathroom pods made in another BCAs region.

Potential impacts of the proposals

These proposals are still being developed. Detailed design work is required in order to ensure the proposed changes will have the desired impact. This section presents a view of the potential impacts, based on what is known so far.

These proposals should give the industry a way to demonstrate that their work will comply with the building code across their range of products, rather than requiring a certificate for each product (as with CodeMark). This should speed up the consenting process.

The manufacturer certification would provide manufacturers, developers, homeowners, and the finance industry with certainty that the consent process would be limited only to work not covered by the manufacturer certification. This may help mitigate some of the commercial risks associated with MMC.

When the new framework was implemented, there would be an impact on BCA processes to reflect their role and responsibilities with regards to the new framework and the manufacturer certification scheme. Requiring BCAs to accept each other's consents would also impact BCA processes.

Compliance costs would be associated with the manufacture certification scheme. Some manufacturers might find these hard to bear, particularly small manufacturers just starting out. Compliance costs could also be passed on to consumers. These compliance costs would be balanced against the greater certainty and consistency for the sector.

These proposals should remove the time loss, uncertainty and duplication of effort caused by the occasional requirement of two building consents for the same building work. This would benefit even those without the manufacturer certification. The clarity about roles and responsibilities with regards to MMC should further improve consenting efficiency, and encourage all parties to take appropriate responsibility for their role in the building process.

The impacts of these proposals will be explored more fully as development of the proposals continues.

Questions for stakeholders	
2.23	Are these the correct features for a future-proofed regulatory framework for MMC?
2.24	What would be the impact of such a regulatory framework for MMC?
2.25	**For manufacturers of MMC, including off-site manufacture:** How would the proposed framework impact your business?
2.26	**For manufacturers of MMC, including off-site manufacture:** Would you use the manufacturer certification scheme, and how would it need to be designed to work for you?
2.27	**For building consent authorities:** What would be the impact of a requirement for BCAs to accept one another's consents and Code Compliance Certificates?

Recap of questions

Part 2 – Building products

2.1	Do you agree with expanding the purpose of the *Building Act* to include the regulation of building products and methods and their use?
2.2	Do you agree with the proposed definition of 'building product'?
2.3	Do you agree with the proposed definition of 'building method'?
2.4	Do these definitions provide sufficient scope to account for new and emerging technologies?
2.5	Do you support the proposal to require manufacturers and suppliers to supply information about building products?
2.6	**For designers, builders and building consent authorities:** Will the proposed minimum information requirements for building products help you make good decisions about products?
2.7	**For designers, builders and building consent authorities:** Do you need any other information to help you decide whether a building product will result in building work that complies with the building code?
2.8	**For manufacturers and suppliers:** How closely do the proposed minimum information requirements reflect what you already provide?
2.9	**For manufacturers and suppliers:** Will there be an impact on your business to provide the proposed minimum product information for your products?
2.10	**For manufacturers and suppliers:** What is your estimated cost increase? Please include any relevant information on how you calculated your estimate (eg the number of products you produce or supply).
2.11	Do you support the proposals to clarify roles and responsibilities for manufacturers, suppliers, designers and builders?
2.12	Is the current threshold and process for variations appropriate for all circumstances?

2.13	Do you support the proposal to give MBIE the power to compel information to support investigations?
2.14	Would MBIE's ability to compel information about building products or methods and share this with other regulators have unintended consequences? If so, what might these unintended consequences be?
2.15	Do you think the impact of the proposed changes to the regulation of building products and building methods would be positive or negative? What do you think the impact might be?
2.16	How do you think the proposed changes to the regulation of building products and building methods would change how you and your business/organisation operates?
2.17	How long do you think the transition period for product information needs to be to ensure manufacturers and suppliers are prepared for the changes?
2.18	How long do you think the transition period for the changes to responsibilities needs to be so that people are prepared for the changes?
2.19	If the clarified roles and responsibilities came into force before the minimum requirements for product information, what would be the impact?
2.20	**For product manufacturers and suppliers:** Would the changes proposed to the framework for product certification make product certification a more attractive compliance pathway for your products?
2.21	**For designers:** How would the proposed settings to the framework for product certification impact your product specification in building designs?
2.22	**For building consent authorities:** Would the changes to the product certification scheme's settings increase your confidence that a product with a product certificate will perform as intended?
2.23	Are these the correct features for a future-proofed regulatory framework for MMC?
2.24	What would be the impact of such a regulatory framework for MMC?
2.25	**For manufacturers of MMC, including off-site manufacture:** How would the proposed framework impact your business?
2.26	**For manufacturers of MMC, including off-site manufacture:** Would you use the manufacturer certification scheme, and how would it need to be designed to work for you?

2.27 **For building consent authorities:**
What would be the impact of a requirement for BCAs to accept one another's consents and Code Compliance Certificates?

List of acronyms

BCA	Building consent authority
JAS-ANZ	Joint Accreditation System of Australia and New Zealand
MBIE	Ministry of Business, Innovation and Employment
MMC	Modern methods of construction
PCAB	Product certification accreditation body
PCB	Product certification body
PGD	Plumbers, gasfitters and drainlayers
QA	Quality assurance
RFI	Request for information

Have your say

See **page 4** of the introduction (Part 1) for details on how to submit your feedback.

16 **Submissions close on 16 June 2019**