Healthy Homes Standards

CEN Submission on HHS Discussion Document

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People powered wellbeing, together

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Overview

CEN acknowledges the Healthy Homes standards options (excluding status quo options) potentially represent a significant step forward compared with the provisions of existing legislation. We also acknowledge the opportunity provided by MBIE to give formal feedback to the process of developing the HHS.

The below general comments and the following specific, largely technical feedback should be read within the context that CEN is firmly committed to ensuring all New Zealanders are able to affordably live in a warm dry home. CEN members work within their communities and understand that the reasons why some people are unable to keep a house warm and dry are many; including the physical aspects of the house as well as other harder to measure issues such as affordability or even the mental health status of the people living in them.

These issues provide a situation where a successful outcome is predicated on a complex interaction of policy positions and so a complete solution cannot be developed under one piece of regulation or standard therein. That said, a well thought out and connected (to other policies) HHS has the potential to make a massive positive impact on the outcomes for hundreds of thousands of people and so we believe strongly that the Government should be brave in ensuring the standards are as robust and effective as they can be.

General Comments

While it is appreciated that achieving the overall health goal of *"ensuring every family has a warm, dry and secure home"*[1] requires other policies beyond the scope of healthy homes standards, CEN's concern is that the HHS options offered are lacking in a number of key areas, with the result that the desired outcome for many rental homes will not be achieved. Taken together these issues point to a lack of a systematic approach and will mean that in many cases. The overall goal will not come anywhere near being achieved. The main areas of concern are:

- We think the approach taken to heating is flawed because it does not take a whole house view. The room-by-room approach will largely lock in electric resistance, plug-in heaters as the main heaters beyond living areas leading to expensive-to-heat houses. The options offered also do not take account of efficient heating provided in non-bedroom areas and which can contribute to useful house heating. We advocate using a standardised assessment protocol[2] that calculates a whole house heat balance and would provide a much more inclusive and coherent approach to determine heating needs. We provide more details in response to questions in the heating section.
- Some options contain exclusions to key standards that are not adequately mitigated. For example, there is no requirement for equivalent energy efficiency where insulation is unable to be practically

[1] p2, Minister's Foreword to Discussion Document

[2] These are commonly used overseas to underpin home energy ratings assessments. They are used and interpreted by trained and qualified assessors.

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installed (see further discussion under Q8). This is a clear admission that, in these cases, the rental will not be warm and dry at an affordable cost.

- No consideration of curtains. While curtains/window coverings may be a difficult aspect to prescribe through a standard, the absence of any discussion is a considerable gap (see further under Q9). It is also not clear whether curtains are factored into the heating calculations.
- Assessment and certification. CEN's position is that initial assessment and certification from qualified assessors should be the default position, with the possibility for exemptions to allow self-assessment in some instances. We consider that MBIE's focus on self- assessment by landlords is leading to compromises in technical aspects (e.g. the room-by-room approach to heating – simplified so it can be assessed using an online tool) and provides an almost certain risk of undermining the credibility of the standards from the start. CEN views this as a false economy.

Looking beyond the immediate scope of the HHS we are concerned that there appears to be no discernable 'affordability framework' to help guide the extent and stringency of standards. In our experience tenants' inability to afford energy is a major impediment to achieving warm dry homes[3]. While we do not expect healthy homes standards to be the sole response on this issue we would have expected a degree of coherency about how various interventions (including what we have described in previous reports as 'complementary measures') fitted together to provide affordable outcomes. These complementary measures include:

- high quality, face to face, education and behavior change initiatives about using the appliances to maximum effect (e.g. heat pumps, ventilation fans)
- the Winter Energy Payment, including the need to evaluate current effectiveness and potentially refocus
- financial assistance to landlords for some energy efficiency measures
- other assistance to support tenant advice and support services (e.g. budget advice, assistance for curtain banks).

As it stands we think the discussion document makes some rather glib assumptions about improving affordability and overstates the impact that the HHS options will make.
Below we give more detailed responses to the questions asked in the discussion document. Note that for ease of use here we have numbered these questions consecutively as they appear in the document.

Section 1 HEATING

Q1. Do you support option one or two for the location of heating devices that landlords must provide in rental homes? Please explain your reason.

[3] CEN, 2018. Guaranteeing Healthy Homes? Challenges to achieve warm, dry, healthy homes for tenants under potential HHGA Standards. Report to CEN.

As presented, **neither**. Option 1 is an inadequate response in terms of heat coverage, and Option 2, while providing better coverage of the house, is inflexibly designed, likely to lock in inefficiency and does not necessarily provide affordable heating for tenants.

The room-by-room heating proposal outlined in Option 2 and Appendix 1 is problematic. By focusing only on bedrooms (beyond the main living area) this option leaves significant parts of the house cold, while potentially locking in inefficiency by not allowing for some existing heating in rentals that can efficiently provide heat (such as heat pumps in hallways). We contend that a 'whole-house' view needs to be taken with regards to heating. This needs to set whole-house heating thresholds (and running costs), and allow greater flexibility in the way heating needs are met.

The wording of this section is also problematic in that it talks about the location of *heating devices* that must be provided. This reflects the narrow, room-by-room, appliance-centred approach to thinking about heating. We contend that the HHS rules must be flexible enough to accommodate all manner of heating systems that may be used now, and in future rentals. This includes ducted systems from a centralised source (heat transfer, central air heating) where the only in-room fixture is a vent.

Second, as noted in the Discussion Document heating only the living areas risks causing crowding in the warm room. Transmission of disease comes from crowding, not so much from temperature. But by largely treating the rest of the house as spaces to be heated by electric resistance heaters, which is little different from the current situation, heating these spaces will remain unaffordable to many tenants. The living area will remain as the only heated space, and over-crowding/health risks remain.

Q2. Do you support option one or two above on whether landlords should provide heating devices that are capable of reaching 18°C or 20°C in room(s) covered by the heating standard? Please explain.
Option 2. This option will better meet the health objective for all categories of prospective tenant, including allowing for an aging population. 20°C is also a more acceptable temperature for comfort for sedentary activities and will better meet the needs of an aging population. It would be unacceptable if fixed, efficient heating (particularly in living areas) was only provided to achieve 18°C since occupants would then have to revert to inefficient and/or costly forms of heating to provide a sufficient top-up level of heating.

Q3. Do you support option one or two for heating devices to be provided by a landlord in a rental home?
As presented, **neither**. Re our response to Q1, CEN contends there needs to be a whole-house approach taken to heating. This would make clear the extent to which fixed heating throughout the house will be required. All fixed heating should be a landlord responsibility. In terms of Option 1 presented for this question, the problem is that the respective responsibilities are misplaced. It should not be the case that portable electric heaters are presumed as the base heating option with fixed heating required only where portable heating capacity is insufficient. The responsibility should be reversed. The heating standard should establish the minimum level of fixed, efficient heating in the rental provided by the landlord, with portable electric heating

providing the top-up. The portable heaters used should be the responsibility of tenants – in this way tenants choose the type of plug-in heater that best suits their preference (e.g. fan, oil column, radiant or combination).

Q4. Do you agree that a class of acceptable heating devices is created for those devices that are efficient, healthy and affordable for the heating standard? Please explain:
Partially agree. In terms of our response to Q1 the required fixed heating in a rental should meet minimum requirements for efficiency/running cost and health. We note however that creating an 'acceptable' list poses risks because it may lock out innovation or new approaches. We think *outcomes criteria* should be the drivers that define acceptability or not. Criteria might include: efficiency, running costs, low temperature performance, environmental impacts.

Q5. Do you agree that the heating devices listed above (unflued heaters, open fires etc) should be not acceptable for the heating standard? Please explain.
Agree that unflued heaters and open fires are unacceptable for the heating standard, but as noted above our preference is that relevant criteria define devices that are unacceptable.
The problem with the list proposed is that such prescription invariably invites scrutiny of potential inconsistencies e.g. the electrical overload argument being used to limit individual bedroom plug-in capacity whereas the sum of all the allowable heating loads of individual bedrooms ignores likely house electric supply overloads.

Q6. What other types of heating, if any, do you think should be acceptable or not acceptable in the heating standard? Why?
Again, relevant criteria should define acceptability. For example, a specific area of concern is the apparent blanket acceptability of heat pumps. While CEN regards well-sized, modern heat pumps as a very important heating appliance for rentals, not all heat pumps are created equal. Older, pre-inverter heat pumps with very poor winter cold temperature heating performance still exist in some houses and are inadequate. Such issues need to be addressed through the criteria (which in the case of heat pumps may include age as a criterion).

Section 2 INSULATION

Q7. Which of the options (1, 2 or 3) for the minimum level of insulation required do you support? Please explain.
Option 3 (qualified). Option 3 is the only option that provides a (just) credible minimum standard. Even then by the time the Standard takes effect (at latest 2024) it will have been current in the Building Code for 16 years. Current Building Code levels are well below 'better practice' for new homes[4], and well below levels in Australia. It should also be noted that describing Option 3 as "akin to 2008 Building Code" is misleading

[4] For example insulation levels specified by Homestar 6 or 7 (New Zealand Green Building Council)

because the Building Code has a whole house approach that also include insulation requirements for walls and windows.

With regard to the ongoing acceptance of foil for underfloor insulation CEN believes that foil should not be considered a legitimate underfloor insulation product from 1 July 2019.

CEN also believes that all insulation should be installed to NZS 4246 (2016). It is noted that this is a reasonably technical standard that most landlords will not be aware of, let alone be able to assess against. This again highlights the importance of professional assessments to ensure outcomes align with the goals of the standards.

Q8. Do you agree that the exceptions set out in the 2016 regulations should continue under the proposed insulation standard (e.g. when it is not reasonably practicable to install insulation)? Please explain.
There are reasonable (practical) grounds for not installing insulation, and this should continue to be allowed. But such situations should:

a) be noted on the compliance certificate, and
b) have an approved form of '*compensatory measure'* installed. A key principle is that the *compensatory measure should be a form of energy efficiency that provides similar benefits to the insulation foregone*.

As proposed in the Discussion Document the only way in which lack of insulation is recognised is in the calculation of heating capacity i.e. less insulation would require greater heating capacity. If all the heating capacity was provided by heat pumps they would likely provide a reasonable compensatory effect. However, the proposed heating requirements do not ensure this - in many situations increased heating capacity will simply be provided by more electric resistance heating. This will inevitably lead to increased heating costs for tenants to achieve the temperature standard. This is an unacceptable outcome, and potentially locks in poorly performing houses with a 'compliant' tick.

Options for acceptable compensatory measures will likely include increased heat pump capacity, heat transfer system from an efficient heat source, wall and/or window insulation. Adequate compensatory measures when underfloor insulation and a ground moisture barrier are unable to be installed will be much more difficult to achieve – we discuss this further in response to Q20. We also note that it would likely be outside the technical expertise of the landlord to understand what level of compensatory measures will need to be. In this case, a professional assessment would need to be conducted.

Q9. Do you think any other requirements for insulation should be included in the standard and, if so, what?

Curtains
We believe a shortcoming in the discussion document is the absence of discussion on the scope and practicality of including curtains in living areas and bedrooms in the standards. On a per area basis windows are the most energy inefficient element of the building envelope. Well layered and fitted curtains provide an

effective insulation layer over windows at night when most of the heat loss from windows occurs, greatly improving the comfort and livability of the home.

Curtains are not a requirement of existing regulations, resulting in a very mixed provision/ availability of curtains in rentals. Many landlords provide curtains for some or all living areas and bedrooms, some tenants bring their own curtains to fit (whether or not landlords provide), and some rentals do not have curtains. CEN members have long-standing insights into the benefits of curtains in homes, having instigated curtain banks in a number of areas throughout the country to meet needs where curtains are not provided. Curtain banks are now providing curtains into thousands of homes per year, a large number being rentals.
As a core principle CEN believes that curtains should be fitted for, and remain in the house. There should not be an expectation that tenants be responsible for providing their own curtains.

We understand that curtains have not been specified in the standards because of legal advice received by MBIE. CEN would like to see, and understand this advice. As it stands, by specifically excluding curtains the unstated message is that they don't matter in achieving a warm, dry, comfortable house. We strongly reject this position. We are concerned that a consequence of this position will be fewer landlords including curtains in their rentals – a backward step from the status quo – and greater demand falling on curtain banks, which are provided by charitable community-based enterprises with limited resources.

We strongly recommend that MBIE undertakes further discussion with interested parties on this issue, shares the legal advice, and at a minimum considers options that will at least facilitate curtain provision in rentals (e.g. require curtain tracks to be a fixture).

Outdated downlights
While rules exist to allow some degree of thermal compensation for the inefficiency of old downlights (the inefficiencies include gaps that allow room air into the ceiling cavity, and fire rules requiring an insulation setback), these provisions are inadequate. We believe there should be a requirement to remove all such downlights from rentals by a specified date.

Q10. Would any of the above options inhibit future innovation and/or flexibility? If so, how?
We think the heating/insulation standards, and the methodology used to calculated minimum requirements, should be designed in such a way that they would be consistent with, and be able to be integrated into, relevant home energy ratings systems. Energy ratings are a natural complement to prescribed minimum standards because they provide a formal way of recognising performance above minimum standards, thus providing positive signals in the market.

We would also ask that MBIE have their preferred minimum standards expertly scrutinised to ensure that the adverse societal outcomes these standards are designed to address do this. As it stands our concern is that the standards as proposed will simply lock in poor or no insulation in some rentals with inadequate compensatory measures. The result will be ongoing ill health risks and associated adverse effects (as per our

points related to Q1 and Q8). To be clear, this is more than a technical house performance review. It is a cross sector analysis that includes economic and social issues, primarily in the form of 'locked in' energy poverty (similar to what CEN attempted in our second proactive report, which is an addendum to this submission).

Q11 Do you support option one or two to assess a "reasonable condition" for insulation? Please explain.
Neither – see below.

Q12 Do you think any other criteria for interpreting "reasonable condition" of insulation should be included and, if so, what?
We suggest resolving this question by a different approach as follows:

- MBIE should determine minimum acceptable levels of insulation at the point that a full review of the standards is expected to be carried out. Bear in mind that depths of insulation installed in 2008 would be the starting point, so the key question becomes at what loss of depth does the insulation become sufficiently compromised that a top-up should be required?
- Interpolation between these two dates (2008 and the expected review time) to the initial compliance period (2019 to 2024) would establish a minimum depth required at that point.

This provides a more objective and transparent rationale and would provide a simple measure of compliance within the 2019-2024 period, for each climate zone.

Q10. Do you agree landlords should show compliance with the insulation standard by retaining particular records? If so, which records should be retained? Please explain.
We agree landlords should show compliance. But it is CEN's position is that there should be a *compliance certificate* (which includes but is not limited to insulation) for each rental, signed off by a suitably qualified and experienced assessor. The proposal to simply show 'records' is loose and open to abuse.

Section 3 VENTILATION

Q14. Do you support option one, two or three to provide adequate ventilation in rental homes? Please explain.
Option 3 – this is the position consistently promoted by CEN based on its experience with members' staff having visited and observed dampness issues in thousands of rental homes over the years. Option 3 addresses the two main sources of moisture generation in the home. A variant that has been suggested by some is to allow showerdomes as a substitute for bathroom fans, but this is not supported by CEN. Although we recognise that showerdomes are useful a complete reliance on them will not achieve the extraction rates required.

Fan extraction rates should meet industry standards. Ventilation standards need to be accompanied by information and education to tenants and landlords.

Q15. What other forms of ventilation should be considered acceptable, or not included in the standard as acceptable? Please explain.

As with the suggestions for heating standards, acceptability/non-acceptability should be determined by relevant criteria that define the outcome desired to be achieved (e.g. air flow extraction rates, location of extract vents). With suitable criteria it might be envisaged that whole house balanced pressure systems which replace inside air with fresh air could be an acceptable form of ventilation under the HHS, but that positive pressure ventilation systems would not because they do not extract moisture at source (they might still be allowed to remain and be used in houses but not for the purposes of meeting the healthy homes ventilation standard).

Q16. Do you agree that exemptions should be available for certain rental homes from requiring openable windows?

Agree – some bathrooms/showers are internal rooms that do not have windows (and similarly for some kitchens).

Q17. Would any of the above proposed options for ventilation prevent future innovation and / or flexibility? If yes, how?

No further comments.

Section 4: MOISTURE INGRESS AND DRAINAGE

Q18 Do you support option one or two above to address the problems identified with moisture ingress and inadequate drainage in New Zealand rental homes? Why/Why not?

Option 2 (qualified). We agree with the assessment in the Discussion Document that the status quo (Option 1) clearly does not meet moisture control objective of Act. However in relation to Option 2 we note that BRANZ house condition surveys have found that most older houses don't meet current requirements (NZS 3604:2011) for subfloor ventilation[5]. Hence under Option 2 most older houses with accessible floors would require a groundsheet. However BRANZ[6] also recommends that where damp soil conditions exist, the ground be covered with polythene, even where the minimum subfloor ventilation requirements of NZS 3604 are met. This suggests that reliance on NZS 3604 on its own is not sufficient to provide adequate sub-floor moisture control.

[5] BRANZ, 2014. *High and Dry.* Builders Mate Issue 64 Feb 2014.
[6] BRANZ Guideline June 2011.

Hence we consider that a simpler and more robust solution for the Moisture Ingress and Drainage standard would be to require a ground moisture barrier for any enclosed foundation.

Q19. Do you think other requirements for moisture ingress and drainage should be included in the standard? If so, what?
A number of other issues can contribute to building dampness e.g. general weather-tightness deficiencies (roof leaks, poorly maintained windows and doors, poorly maintained cladding), plumbing issues (leaking pipes under the floor, leaking pipes inside), poorly designed mechanical ventilation systems. But a key question for MBIE to address before specifying further requirements of the standard is determining the extent to which prevention or mitigation measures are already provided for under other legislation.

Q20. Do you agree with the proposed exemptions? Do you think there are other homes that should also be exempt?
We agree that a pole house with open air space between the floor and ground should be exempt. For the other two proposed exemptions, **No**. Given that BRANZ do not consider that the requirements of NZS3604 are adequate where soils are wet, granting an exemption based on meeting the standard would seem misplaced. Our overall concern is that in a naturally wet area if there is insufficient access to allow for a ground moisture barrier (and underfloor insulation) to be installed, and the minimum subfloor ventilation requirements of NZS 3604 are of limited effectiveness, the house is likely to be persistently damp, a breeding ground for mould, and a cause of ill health for the tenants. In these situations we think there are grounds for declaring the house unsafe for habitation unless other remedial work is undertaken. This could require lifting floorboards so that access can be gained to install a ground moisture barrier and insulation, or lifting the house.

Q21. Would any of the above options inhibit future innovation and/or flexibility? How do you suggest this could be overcome?
No further comments.

Section 5: DRAUGHT STOPPING

Q22. Do you support option one or two above to stop draughts and create warm and dry rental homes? Why?
Option 2 (qualified). The status quo (option 1) is insufficient to deal with NZ's draughty homes. Option 2 is supported qualified by the other requirements outlined below.

Q23. Do you think other requirements for draught stopping should be included in the standard? If so, what?
We suggest an advisory to the standard is issued that specifies the main types of gaps that need attention. For example, the suggested "3 millimetres or greater in and around windows and doors, walls, ceilings, floors and access hatches" could specify common problems including floorboard gaps, gaps around electrical sockets,

gaps around skirting boards. Other common sources of draughts where advice could be provided are cat doors and gaps in cladding.

Further advice should be provided on draught stopping materials, installation and prior preparation, and instructions on how to safely block or decommission chimneys and fireplaces. Draught stopping materials can also have a relatively short life, so some thought needs to be given to the timeframe compliance and the need for checking ongoing compliance with the standard.

Q24. Would any of the above options inhibit future innovation and / or flexibility? If so, how?
We are not aware of concerns.

Q25. Should the regulations specify any exceptions to this standard? If so, what?
No further comment.

Section 6: DATE TO COMPLY WITH THE STANDARDS

Q26. Do you support option one, two or three above for the date that landlords need to comply with the standards for their rental homes? Why/why not?
In principle staggering the date for compliance is supported because such options are most likely to meet the objectives (p47). But no option on its own is ideal, and we favour exploring variations on the options put forward.

Q27. For option One, do you think 1 July 2021 is the appropriate commencement date? Why / why not?
An earlier start date is preferable - it does not seem desirable or necessary to wait 2 years beyond the date when the regulations come into force (1 July 2019). An earlier start date also provides the opportunity for early compliance monitoring by MBIE, with the ability to cement in place standards and expectations.

Do you agree landlords should be given a grace period of 90 days between the start of a tenancy and when they need to comply?
In combination with an earlier commencement date (above) extending the grace period beyond 90 days would provide greater flexibility for landlords to comply.

Q28. For option two, do you think 1 July 2022 is an appropriate date to allow landlords, industry and government with sufficient time to comply with the standards? If not, which date do you think would be appropriate, and why?
CEN does not favour Option 2. Recent RTA experience with insulation suggests a single compliance date for all measures is not desirable and should be avoided. The single 1 July 2022 date would likely lead to excessive

demand as the compliance date loomed, stretch industry capacity, and lead to likely high levels of non-compliance and compromised quality standards. The option also does not meet the stated objective of being implemented as soon as is practically possible in particular for at-risk groups.

Q29. For option three, which approach do you think is an appropriate way to stagger implementation (by standard or location)?
Neither option is ideal. Staggering compliance by location still leaves the likelihood of overloading localized industry capacity leading up to the respective compliance dates. Also the suggestion to start in the coldest areas does not prioritise need. Staggering compliance by the standard may offer flexibility for landlords but risks additional costs, lack of cohesion, and lengthy delays before good heating is installed (there would need to be a prescribed order of standards with moisture control dealt with first because unless this is addressed, standing water under houses can be a reason for not accessing underfloor areas for insulation. This would then be followed by insulation, then heating installed).

Do you have an alternative approach to staggering implementation that you think we should consider?
Stagger compliance by deprivation area. This option both provides the benefits of a staggered approach with prioritisation of at-risk groups. It would also provide a spread of staggered compliance around the country (although the weighting of early compliance would be in locations with a large number of high deprivation areas such as South Auckland and Northland).

There could also be an approach where assessment of all rentals is required within the first year (or 90 days of change of tenancy, whichever is first), with any required retrofits staggered over the 5 years. The focus on high deprivation areas could still be used, with shorter periods between the staggered compliance requirements. Requiring assessments to be completed within the first year will allow for an auditable document trail to be generated quickly. It may also circumvent unnecessary implementation costs (where the assessments are checked by experts and deemed to be overly cautious) and highlight the need for more effort in provision of education linked to poor quality outcomes from online assessments and/or tenancy behaviour.

Q30. Is there a feasible compliance date option that has not been considered? Please explain
We think the best approach to achieve the objectives outlined in the discussion document for timing to implement the standards will be a combination of options. We suggest MBIE explores combinations of options – for example combining the Option 1 approach with a staggered compliance date by derivation area.
Other approaches, that fall outside of the prescribed standards, would be worth investigating. For example government could invite negotiated agreements with landlords for early compliance in cases of high health needs. This may need to include a one-off financial incentive for early compliance e.g. one-off tax rebate.

CEN also believes that there should be a limitation to the compliance period described in the standard. More specifically, due to many factors such as general wear and tear, a rental property should be deemed compliant for a set period before being reassessed (we would suggest no longer than 3 or 4 years based on typical lifespan for elements such as heating devices and draught stopping).

GENERAL QUESTION FOR FEEDBACK

Q31. Do you agree with the assumptions and analysis in the document for the indicative costs and benefits, and our analysis of the advantages and disadvantages?
Covered in other responses.

Section 7: IMPLEMENTATION

Q32. What records should a landlord retain to show compliance with each healthy home standard (e.g. R-value certification for the insulation standard)?
There should be a standardised *Compliance Certificate* for each rental showing that all aspect of the required healthy homes standards have been complied with, signed off by an 'authorised agent'. Some exemptions could be considered (e.g. rentals built post 2008). An authorising agent could be based on having attended and passed a suitable training course.

Q33. What could be included on the tenancy agreement to show the landlord has complied with each healthy home standard (e.g. a description of the mechanical ventilation supplied in the kitchen and bathroom for the ventilation standard)?
Covered by the compliance certificate.

Q34. What are the most important considerations in developing a tool to help tenants understand and landlords to comply with the heating standard?
This approach invariably will result in tenants assuming a de facto policing role of the heating standard. All this would be avoided if assessment and certification was a required part of the HHS process.

Final Comment

CEN once again thanks MBIE for the opportunity to provide our submission to this the develop fo the HHS. We have also attached two reports that provide further detail into the positions we offer above. We would also welcome the opportunity to explain any points made in this submission or back up reports at any time to Government staff. We look forward to helping Government implement a highly effective Standard that will make a real difference to many New Zealanders.