



Ministry of Business,  
Innovation and  
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**About Us**

Thank you for this opportunity to submit on **the Rental Tenancies Amendment Bill**

The Blueskin Resilient Communities Trust (BRCT) is a registered charitable trust formed in 2008 to support sustainability and transition initiatives in a planned and structured way. We work as a legal body to provide a public benefit and achieve the long-term objective of building community resilience, particularly in the context of our changing climate. Our headline work is our community wind development and our core activity areas are in energy (Cosy Homes, Home Performance, Energy Advice), climate change action, and provision of community services. We offer support to number of community groups working in the field of sustainability. We are a member of the Community Energy Network and participate in the Cosy Homes Trust. Jeanette Fitzsimons is our patron.

**Our submission**

We strongly support the intent of the Rental Tenancies Amendment Bill (RTAB) in that it is designed to improve housing for the 35% of NZ households that are rentals. In many cases, these people represent New Zealand’s most vulnerable households. We thank MBIE for the opportunity to submit on the RTAB and will follow the decision making process carefully via the Community Energy Network.

Submission Point	Reason
1. The best return on investment is seen when all key factors to a warm dry home are considered together	<ul style="list-style-type: none"> <li>To ensure the intervention is effective in providing health benefits, the RTAB should include minimum requirements for other types of insulation (such as</li> </ul>

	<p>curtains), fixed heating, ventilation (extractor fans in bathrooms and kitchens) and ground moisture barrier.</p> <ul style="list-style-type: none"> <li>The proposed changes to the regulations will not address many of the core issues in poor performing rental accommodation and therefore the benefits, mainly relating to health, will not occur.</li> </ul>
<p>2. This Bill has the potential to make a significant impact on the overall health of Maori.</p>	<ul style="list-style-type: none"> <li>72% of Maori are in rental accommodation.</li> <li>Trends in the NZ housing market point to this increasing and for Maori especially, to be long term.</li> </ul>
<p>3. Insulation levels in all rental properties should be brought up to the current Building Code standards/WUNZ programme levels.</p>	<ul style="list-style-type: none"> <li>The RTAB allows many homes to be compliant if they meet the 1978 standard (70mm of insulation in the ceiling) which is only half the effective insulation currently required by the Building Code, the government's Warm Up NZ programme (WUNZ), and Housing New Zealand insulation programme.</li> <li>Unless the current minimum standard is maintained, it is likely that in many cases the RTAB <b>will not achieve the expressed goals.</b></li> </ul>
<p>4. There is a significant risk of a poor quality outcome given the lack of a robust, sector wide quality assurance system.</p>	<ul style="list-style-type: none"> <li>CEN believes that an appropriate installation quality assurance system, such as that provided for in the WUNZ programme should be used.</li> <li>All New Zealand eligible rental homes should be receive the same quality of compliant insulation retrofits as those provided for in the WUNZ programme.</li> </ul>
<p>5. A poor awareness of technical aspects will also lead to an increase in risk to health and safety of DIY installers and residents.</p>	<ul style="list-style-type: none"> <li>The proposed regulations will allow foil underfloor insulation. While foil may be cheaper:             <ul style="list-style-type: none"> <li>Foil provides poor insulating performance and has a limited lifespan,</li> <li>There are major safety risks associated with the installation process (electrocution).</li> </ul> </li> <li>A lack of a quality assurance (QA) system <u>will</u> result</li> </ul>

	<p>in covered downlights and consequent fire risks to tenants and potential loss of insurance cover for landlords.</p>
<p>6. There is a risk that a large number of the estimated 180,000 retrofits will be deferred by landlords until the last year (2018/2019).</p>	<ul style="list-style-type: none"> <li>• If this issue occurs it will require the sector to install a large and potentially disruptive number of rental dwellings in 2018/19 followed by a probable sharp decrease in 2020. MBIE needs to ensure regulations allow for a smooth transition over the three years.</li> </ul>

### Recommendations

- All forms of insulation and, if possible, other features such as ground moisture barrier required for a healthy home must be included to realise health benefits.
- Insulation and installation regulations should require the same standard as the current Building Code and WUNZ programme at the very least.
- DIY installation needs to be checked by trained and qualified people to ensure it is effective and safe.
- Foil **must not** be allowed to be used for underfloor insulation.
- The installation of insulation and smoke alarms needs to be well managed to enable the sector to respond in an economically sustainable way.