



27 June 2024

## Submission on Overseas Building Standards and Building Products

Thank you for the opportunity to submit on MBIE's proposal to remove barriers to make it easier to use a wider variety of high-quality building products from overseas.

This is an important issue for New Zealand Certified Builders, and we have considered the views of a number of our members in preparing the following responses.

### Making it easier to use building products that meet overseas standards

1. What factors should be included in the decision making before recognising building product standard organisations?

#### Competence of the organisation

- When considering overseas product standards, MBIE should consider the capability and track record of the organisation issuing the standards. They should be able to demonstrate a history of high performance, and robust assessment procedures. More specifically, MBIE's considerations might include whether the standard or organisation is recognised at an international level, and how long the organisation has been operating for.
- The organisations or standards should come from countries with similar performance expectations to New Zealand. They should be assessing building products for performance under similar conditions as they are likely to experience in New Zealand, with particular attention paid to seismic and weather-related performance.
- The standards should be easy to understand from a New Zealand perspective, and ideally should be correlated with equivalent standards in force in this jurisdiction.

#### Economic/competition factors

In New Zealand, we often import affordable products from overseas, but they become expensive due to high markups by importers. To help counter this, MBIE needs to ensure that standards are robust and relevant to our local conditions. They should be easy to access and regularly updated to prevent local companies from gatekeeping and inflating prices. Additionally, it's crucial to consider how these standards will impact local suppliers to maintain a competitive and fair market.

### Streamlining the citing of international standards

2. What types of product standards should MBIE prioritise in its review of international standards?

MBIE should prioritise product standards that will ensure the appropriateness of the product for New Zealand conditions, such as their performance in earthquakes, high sea spray zones, geothermal zones, and resistance to our high UV light levels. Ideally, imported products or building systems should be subjected to rigorous checks to ensure the standard or certifications are compatible with or exceed New Zealand standards.

3. What types of products do you consider to be higher risk to buildings due to their failure or misuse? This may be a risk to life safety or significant economic losses.
  - Products that ensure the structural integrity of a building, particularly in high wind zones or EQ zones 3-4, must meet the highest international standards.

- There are a number of products that ensure the safety of a building and its occupants that must also meet the highest standards, such as fire warning, containment and suppression systems; electrical wiring; barriers surrounding pools or elevated areas; plumbing systems. Glass used in either windows and/or balustrade systems needs to meet structural and safety integrity, or thermal performance requirements.
  - MBIE should also be aware of risks associated with external cladding, roofing, and insulation systems.
  - We note too that as modern construction techniques develop, particularly with greater use of laminated or cross-laminated timber (CLT) construction in commercial builds, potential risks of glue failure and delamination may increase, especially if the elements are exposed to water during construction or in service or accidental flooding.
4. What factors should MBIE consider when evaluating and comparing overseas building product standards?

When evaluating overseas standards, it's important to ensure they meet or exceed New Zealand's requirements. They should be relevant to our specific conditions and regularly updated. The certification process must be thorough and unbiased, providing assurance that these products will perform as expected. Essentially, we're looking for standards that offer the same safety and performance as local ones without the added costs and logistical challenges.

Regardless of the standards MBIE chooses to adopt, the specifications should be no less than that of an equivalent New Zealand standard or cited international standard.

#### Mandating acceptance of products certified overseas

5. What factors should MBIE consider before specifying appropriate product certification schemes?

Certification schemes need to be robust, with strong monitoring and evaluation processes. Certifiers must be independent and free from conflicts of interest. The certifications should be relevant to New Zealand's building requirements and easily accessible. It's also important to consider the track record of these schemes—have their certified products faced issues in other countries? By considering these factors, we can confidently accept high-quality, affordable building products from abroad.

Some of the specific criteria that MBIE might consider include (but are not limited to):

- Requiring the certificate from an accredited body to meet the same standard as NZ CodeMark accrediting bodies;
- Identifying the relevant NZ Building Code clauses that the product/system complies with;
- Ensuring the certificate clearly states the limitations of the product; and
- Ensuring the certificate has a review and renewal process covered under the accrediting body requirements.

Yours sincerely



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