BUILDING PERFORMANCE

Consultation submission form

Building Code fire safety review

Issues in the Building Code regulations

October 2024

MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

Te Kāwanatanga o Aotearoa
New Zealand Government

Contents

Seeking feedback

How to submit this form

This form is used to give feedback on the Building Code fire safety review discussion document.

When completing this submission form, it helps if you add comments and reasons explaining your choices. Your feedback is valuable as it informs decisions about fire safety proposals for the Building Code.

MBIE needs your feedback on the Building Code fire safety review by 5:00 pm on Friday, 6 December 2024.

- Email: building@mbie.govt.nz, with subject line Building Code Fire Safety review
- Post:
  Building Code Fire Safety review
  Building System Performance
  Ministry of Business, Innovation and Employment
  PO Box 1473
  Wellington 6140

Next steps

Your feedback on this document will be collated and analysed along with all the other responses.

Following consideration of the submissions, MBIE will develop potential options for improvements to fire safety provisions in the Building Code.

MBIE will seek feedback on these potential options for change through a further round of public consultation. Timelines for the review will depend on the information received in this year's consultation and any new or emerging issues along the way.

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- provide a separate version, with your confidential information removed, for publication on the MBIE website.

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Seeking feedback

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Your information

MBIE would appreciate it if you would provide some information about yourself. This helps MBIE understand the impact their proposals may have on different occupational groups. Any information you provide will be stored securely.

A. About you

Name:	Nick Hill Chief Executive Building Officials Institute of New Zealand (BOINZ)
Email address:	NickHill@boinz.org.nz

B. Can MBIE contact you if they have questions about your submission?

☒ Yes ☐ No

C. Are you making this submission on behalf of a business or organisation?

☒ Yes ☐ No

If yes, please add the name of your company or organisation.

The Building Officials Institute of New Zealand (BOINZ)

D. Select your role or the best way to describe your organisation:

☐ Architect

☐ BCA / TA / Building Consent Officer

☐ Builder or tradesperson (please specify below)

☐ Building product manufacturer or supplier (please specify the type of product below)

☐ Building resident, occupant or user (please specify below)

☐ Commercial building owner

☐ Designer (please specify below)

☐ Engineer (please specify below)

☐ Evacuation specialist

☐ Fire and Emergency NZ

☐ Independent Qualified Person (IQP)

☐ Residential building owner

☒ Other (please specify below)

☐ Prefer not to say

For nearly 60 years the Building Officials Institute of New Zealand (BOINZ) has been the peak body for building surveying in New Zealand, with over 1250 members. BOINZ has supported strong and fair regulation of the building industry.

BOINZ vision is to 'Improve the Quality and Performance of the Built Environment', with professional development programmes it aims to improve the competency of building surveyors, and unapologetically seeks to improve building outcomes for building owners and occupiers.

It is our belief that BOINZ is the only organisation within the design and build sector that can truly provide independent oversight and advise on best practice outcomes without sector interference. Our submission is based on member input as a result of their observations and experiences.

E. Personal information

The Privacy Act 2020 applies to feedback provided in all submissions.

☐ Please tick the box if you do **not** want your name or other personal information included in any information that MBIE may publish.

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If you have ticked this box, please tell us what part(s) of your submission you do not want uploaded on MBIE's website and why.

[Please insert here]

G. Official information

The Official Information Act 1982 applies to all submissions received by MBIE.

☐ If you would like your submission (or parts of your submission) kept confidential please tick the box and **state** your reasons and ground(s) under sections 6, 7 and/or 9 of the Official Information Act that you believe apply, for consideration by MBIE.

If you have ticked this box, please tell us what parts of your submission you would like to be kept confidential, your reasons for this, and any grounds under the Official Information Act that you believe apply.

[Please insert here]

1. Outcomes of the review

This section covers the outcomes that MBIE wants to achieve with its Building Code fire safety review. These outcomes provide areas of focus for the issues MBIE wants to resolve.

Questions for the consultation

1. MBIE has identified outcomes they would like to achieve for fire safety in the Building Code. Please select whether you agree or disagree with these outcomes.

Please note: BOINZ has numbered the Outcomes and commented against each outcome following this table.

Outcome	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Don't know or not applicable
1.1 Building Code requirements need to be clear on protection levels based on building types and their users.	☐	☐	☐	☒	☐	☐
1.2 Fire safety provisions in the Building Code need to keep up with changes in urban design, modern construction methods, and the different ways buildings are being used.	☐	☐	☐	☒	☐	☐
1.3 Ensure fire safety regulatory requirements in the Building Code are fit for purpose and cost-effective.	☐	☐	☐	☒	☐	☐
1.4 Minimise gaps and inconsistencies in fire safety regulation to provide certainty, clarity, and consistency.	☐	☐	☐	☒	☐	☐

General questions

Comments on the Outcomes

Outcome 1.1: requirements need to be clear

The Building Code, Schedule 1 of the Building Regulations 1992, (NZBC) is written around building uses, not building types. NZBC clause A1 Classified uses has the following uses. Housing, Communal residential, Communal non-residential, Commercial, Industrial, Outbuildings, and Ancillary buildings.

Because building regulation is about the wellbeing, health and safety of people, the use of the building is more important that the type of building. For example, a large single-story building, constructed as a warehouse for the storage of non-combustible products, will have a population of say 10 people. When the same building is used as an entertainment venue for concerts the population may be 3000 people. Correspondingly, the building will require different features for NZBC compliance, such as for means of escape from fire and services and facilities.

Outcome 1.2: keep up with changes

In performance-based regulation, with the performances set correctly, there will be significantly fewer changes required than for more prescriptive legislation. This is the challenge when setting performances. They should be clear enough and at a sufficiently high level to cover situations that are unforeseen. For example, why is C2 *Prevention of Fire Occurring* limited to fixed appliances using controlled combustion?

BOINZ suggests that this clause could be updated to cover a wider range of situations including practices that could lead to chemical (e.g. battery) fires.

Outcome 1.3: fit for purpose

NZBC Fire Safety requirements need to be fit for purpose. Fit for purpose includes compatibility with other NZBC clauses, cross referenced where appropriate, and compatible with available design inputs and provides for the necessary features to enable the ongoing management and maintenance of buildings. That is, the management of the fire evacuation scheme and maintenance of the specified systems to enable the owner to issue the building warrant of fitness (BWoF), as examples.

Fitness for purpose in the Building Act 2004 (BA04) is about health, safety and wellbeing of building users, protection of other property, property protection for household units and providing facilities to assist fire fighters. Any changes to how fit-for-purpose it treated will need to match existing purposes and principles in the BA04, or the purposes and principle should be updated to ensure consistency.

Building cost is included in BA04 s4(2)(e) as 'the cost of the building (including maintenance) over the whole of its life'. Compatible with this definition of cost is reducing compliance cost by making designing, consenting, construction, maintenance and management of buildings less expensive over its life.

BOINZ does not endorse reducing capital cost of constructing a building by lowering the level for NZBC compliance. A well-educated sector that understands the roles of other players in the sector will streamline the end-to-end correct functioning of fire systems through the life of the building, from provision of fire fighting water supply through the consenting system to construction, management and maintenance to demolition. To achieve an efficient and effective fire safety it is important to get all the inputs to the system correct.

Outcome 1.4: Minimise gaps and inconsistencies

BOINZ agrees with this statement and wishes to offer support to MBIE to deliver clear and consistent NZBC clauses, terminology and messaging. MBIE's lack of adherence to clear consistent messaging has, and does add, enormously to the confusion and misunderstanding of the building regulatory system.

Examples:

- MBIE's annual 'Building Code updates' are not updating the NZBC, but are updating Acceptable Solutions and Verification Methods.

- Consequently, this consultation uses the term 'Building Code regulation' and in the next question 'fire regulation in the Building Code', two new terms for the NZBC.
- Determinations. Determinations can be challenged through the courts, generally on points of law and this is appropriate. However, we note there could be cases where determinations that are incorrect, not challenged through the courts, and are ultra vires to the BA04 and unfortunately remain with guidance status for application to other buildings.
- Purpose groups from previous fire safety Acceptable Solutions are used as the means to establish change of use, when the current Acceptable Solutions and Verification Methods use risk groups.

2. How well do you think the fire regulations in the Building Code are currently performing against these suggested outcomes? Please provide evidence if you can.

Not at all well	Not very well	Somewhat well	Very well	Don't know
☐	☐	☒	☐	☐

Please note: BOINZ has numbered the Outcomes and commented against each outcome following this table.

Outcome 1.1: requirements need to be clear

Using NZBC the Classified uses, the risk groups in Acceptable Solutions and Verification Methods, the building uses from the previous acceptable solutions in the Building (Specified Systems, Change the Use, and Earthquake-prone Buildings) Regulations 2005 and Building Importance levels (an adaption of the Building Importance levels from the Structural Standards), shows the complexity of the existing fire safety in the building regulatory system. Defining clear, consistent granularity required for an integrated streamline regulatory system, applicable across the whole NZBC and applicable for fire is essential for the useability of the building regulatory system.

Outcome 1.2: keep up with changes

NZBC clause C2 *Prevention of Fire Occurring* is not covering situations other than controlled combustion appliances when it could, and should, be updated to cover other sources of fire, including chemical fires, which would include fires from faulty battery charging equipment.

Outcome 1.3: fit for purpose

Fire Safety provisions in the Building Act and NZBC need to be updated as part of an integrated system covering fire safety provisions for the life of the building, from subdivision (firefighting water), building design, consenting, construction, maintenance and management, through to demolition of the building at the end of its life. Having the integrated system working will give buildings a longer life, save resources, increase sustainability and produce less carbon.

Outcome 1.4: Minimise gaps and inconsistencies

BOINZ agrees with this statement and wishes to offer support to MBIE to deliver clear and consistent NZBC clauses, terminology and messaging. Improvement of clear consistent messaging will significantly reduce confusion and increase understanding.

3. Are there other outcomes MBIE should consider for the review?

☒ Yes ☐ No

This review should have an **additional objective** of providing an integrated system to align with:

- the life cycle of a building, from concept to demolition
- the consistency, style and format of other NZBC clauses
- FENZ need for firefighting, such a water for firefighting and access for fire appliance vehicles
- BWoF regime, including specified systems and compliance schedules
- FENZ Evacuation schemes
- BA 04 requirements for upgrading existing buildings; Alteration, Change of Use, and Extension of Life, including ANARP

BOINZ would like to see **clear performance criteria** to cover the following issues. These in turn may lead to the identification of additional fire review project objectives.

- Prevention of fire in relation to chemical fires (charging of batteries)
- Fire separation between shared carparking areas and apartments in multi-unit buildings
- Access for fire appliance vehicles for a 'building' when the building may be multiple buildings (eg a university campus)
- Hazardous substances building requirements should be an Acceptable Solution, even if the Hazardous substance storage itself is part of employment in the workplace legislation (HSE)
- Protection of own property. Household units are in the BA04 4(2)(i)(i) principles but not in the NZBC. If property protection is extended to other building uses there will need to be an exemption for building uses such as storage of explosives, where the size and location will be covered in the resource consent, and protection of other property is critical.

4. Would you like to provide feedback on your answers, please tell us.

☐ Yes ☐ No

Please see previous answers in Question 3 above.

2. Effectiveness of fire safety measures in the Building Code

These questions relate to the effectiveness of the fire safety measures in the Building Code. An effective Building Code supports the purposes and principles of the Act, to make sure that:

- People who use buildings can do so safely and without endangering their health.
- People who use a building can escape from the building if it is on fire.
- People entering a building to carry out rescue operations or firefighting are protected from injury.
- Protection is provided to limit the spread of fire and its effects.

Questions for the consultation

5. MBIE have identified the following issues related to the effectiveness of the fire safety provisions in the Building Code. Please select whether you agree or disagree with the following statements.

Please note: BOINZ has numbered the Statements and commented against each outcome following this table.

Statement	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Don't know or not applicable
5.1 Insufficient consideration is given to the evacuation needs of different occupants in a building, such as vulnerable occupants. This means that some people could be at greater risk in a fire.	☐	☐	☐	☒	☐	☐
5.2 The Building Code fire safety provisions do not adequately consider the specific hazards, such as building height, building importance, building use, or other factors. This means that the requirements may not be cost-effective for all building owners.	☐	☒	☐	☐	☐	☐
5.3 The fire safety objectives in the Building Code focus on keeping people safe and protection of other property. It does not address protecting owners' investments. This can leave gaps in the protection of buildings and increases the risk for responding firefighters.	☐	☐	☐	☐	☒	☐
5.4 The Building Code does not provide comprehensive measures for firefighters responding to fires or other emergencies.	☐	☒	☐	☐	☐	☐
5.5 The Building Code does not provide sufficient consideration on maintenance over the life of a building including during construction.	☐	☐	☒	☐	☐	☐

General questions

Issue/Statement 5.1: evacuation needs of different occupants

'Insufficient consideration' is judgemental, perhaps it was cost related or complex in relation to human behaviour when last considered, and perhaps with today's technology is more achievable?

Greater education of designers, installers, and building managers administering the Evacuation Scheme may improve this situation.

Changes to the NZBC to add more physical features into buildings to assist people with disabilities to escape in a fire or other emergency can be achieved in new buildings by changing the NZBC. However, the application of new technology in new buildings that are different to existing buildings will create confusion for building users using a range of buildings vastly different approaches to means of escape. The current transfer/upgrading of new features into existing buildings is via the upgrading provisions in BA40, alteration, change of use and extension of life. If changes for people with disabilities are made to the NZBC, perhaps a scheduled upgrading programme, similar to upgrading earthquake prone buildings should be considered for existing buildings?

Issue/Statement 5.2: specific hazards

The provisions relating to building height, importance level and use are in the NZBC, but are hard to find or are in the wrong place. For example: Functional requirement C3.2 relates to building of greater than 10 m in height, however compliance is established with the performance criteria and not the functional requirement. This is an example of the inconsistency that needs to be resolved.

Issue/Statement 5.3: keeping people safe and protection of other property

Protection of household units is in BA04 s4(2)(i)(i) principles and is not included in the NZBC performances.

Protection of own property may be a way of simplifying the Acceptable Solutions and giving the advantage of simplicity for the means of escape design. For example: for household units in multi-unit buildings; fire detection, fire alarms and sprinklers could be required in each household unit. The fire sprinkler will reduce the chance of household unit damage and mitigate surface finish requirements.

Own property protection for hazardous building uses, such a munitions storage, would be ridiculous and would need to be excluded from property protection. Perhaps the exemption could be linked to the resource consent?

Issue/Statement 5.4: measures for firefighters

The measures for firefighting are in the C5 *Access and safety for firefighting operations*, but are not sufficiently enforced. Space and access for fire vehicle appliances needs to be considered for higher density housing, multiunit apartments and for multiple building campuses and included on building consent applications. Should FENZ have more say for key fire provisions such as space and access for fire appliance vehicles?

Issue/Statement 5.5: maintenance over the life of a building

In an integrated system for fire safety, the management and maintenance of fire systems are regulated through the management of evacuation schemes, and BWoF maintenance of specified systems.

Consideration of fire during construction is a separate issued and will need to be addressed and included into the integrated system.

6. Are there any other issues MBIE should consider on the effectiveness of the fire safety measures in the Building Code?

☒ Yes ☐ No

Issues for consideration:

- Fractional effective dose (FED) for children and vulnerable people. The NZBC should contain different FED levels for children and vulnerable people.
- Complying with the NZBC and upgrading requirements for fire should be developed together, with the NZBC review to add clarity and remove unnecessary duplication
- A proposal detailing ANARP as it applies to upgrading for means of escape is often not included with the building consent application, which then leads to a request for information, delaying the issue of the building consent. As a result, it is claimed there are different interpretation for ANARP, which is not necessarily the case. BOINZ has a training course on ANARP.

7. Would you like to provide any other comments or feedback on the effectiveness of the fire safety measures in the Building Code?

☒ Yes ☐ No

Any review of the fire provision must be undertaken as part of an integrated system approach. By this we mean working with legislation covering,

- the subdivision to ensure utility services for firefighting water,
- access for fire appliance vehicles
- building design and fire design
- building consenting
- construction
- code compliance certificate
- fire evacuation scheme
- maintenance of specified systems (BWoF)
- upgrading existing buildings (alteration, change of use, extension of life)
- consistency with other NZBC clauses

3. Keeping pace with new technologies and new fire challenges

These questions are on improvements in building materials and the technologies used for fire safety systems in buildings. New technologies, urban design and methods of construction have grown rapidly since the last review of the fire safety regulations in 2011.

The Building Code should enable the use of innovative technologies and provide adequate protection from new fire risks.

Questions for the consultation

8. MBIE has identified the following issues where the Building Code has not kept pace with new technologies and new fire challenges. Please select whether you agree or disagree with the following statements.

Please note: BOINZ has numbered the Statements and commented against each statement following this table.

Statement	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Don't know or not applicable
8.1 The Building Code fire safety provisions create barriers to the use of overseas products.	☒	☐	☐	☐	☐	☐
8.2 The Building Code fire safety provisions do not enable mass timber construction and other modern construction methods to be used safely and efficiently.	☒	☐	☐	☐	☐	☐
8.3 The Building Code is not flexible enough to address fire hazards from emerging technologies such as electric vehicles, solar panels, and battery storage systems.	☐	☐	☐	☒	☐	☐
8.4 Further consideration is required in the Building Code for modern housing such as fire spread and access for firefighters.	☐	☐	☐	☐	☒	☐
8.5 There are barriers in the Building Code to using new fire safety systems or technologies as part of a design.	☐	☐	☒	☐	☐	☐

Issue/Statement 8.1: overseas products

This is a politically driven issue not based on how the Building Code system can work. BOINZ acknowledges that surface spread of flame testing standard in C3.4a and it has been superseded by newer versions of ISO 9705 and ISO9239-1. The Building Act has the provision of waiver or modification of the NZBC clauses, and it would be unreasonable for a BCA to refuse the application for a waiver or modification for using a newer standard. Any manufacturer that retested should do better research to understand the building regulatory system to ensure the cost of needless testing is not undertaken.

It is cumbersome have Standards referenced in the NZBC?

The alternatives are to rewrite the performance without referencing Standards or reference the Standards using BA04 section 20. Section 20 allows for mandatory Acceptable Solutions that is one way of complying with the NZBC. The advantage of using S20 is that Acceptable Solutions are quicker and easier to change to keep current, by updating Standard they reference. However, this is a new concept for the industry and will be needlessly confusing.

Issue/Statement 8.2: mass timber construction

Mass timber is not excluded. Someone should think about how mass timber is used, particularly in relation to surface spread. Options include an applied surface finish, or additional features, such as including fire sprinklers into the fire design which may happen if own property protection is considered.

Issue/Statement 8.3: emerging technologies

The NZBC should be changed to enhance C2 *Prevention of Fire Occurring*. Mandating third party safety approval for battery charging equipment, perhaps through other regulation, may be part of the solution.

Issue/Statement 8.4: fire spread and access for firefighters

Access for fire appliance vehicles to multi-unit developments, in-fill housing and campuses should be addressed. Analysing property protection should help with safety of firefighters working within buildings.

Issue/Statement 8.5: new fire safety systems and technologies

New technologies can be evaluated and included in Acceptable Solutions and Verification Methods. Examples could include WiFi smoke detectors and equipment for generating hypoxic environments (reducing oxygen levels) for specific high risk areas, or for a place of safety.

9. Are there any other issues related to keeping pace with new technologies and new fire challenges MBIE should consider?

☒ Yes ☐ No

Continuing education of the building design, including fire design, and building surveying will address keeping pace with new technologies and creating a capability pipeline on fire expertise.

BOINZ have well-attended fire courses targeted at BCAs, held at least twice a year.

10. Do you have any other comments or feedback on the ability of the Building Code to keep pace with new technologies and new fire challenges?

☒ Yes ☐ No

Setting the performance criteria appropriately will include use of new technologies.

4. Certainty, clarity, and consistency

These questions are on the certainty, clarity, and consistency of the fire safety provisions in the Building Code. These provisions should be clear enough to support consistent decisions on whether a building complies with the Building Code.

Questions for the consultation

11. MBIE has identified the following issues where the fire safety provisions do not support certainty, clarity, and consistency in building design and consenting. Please select whether you agree or disagree with the following statements.

Please note: BOINZ has numbered the Statements and commented against each statement following this table.

Statement	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	Don't know or not applicable
11.1 Gaps in regulation have created a complex system to work with.	☐	☐	☐	☒	☐	☐
11.2 The multiple ways to classify buildings can cause confusion on what is required.	☐	☐	☐	☒	☐	☐
11.3 Unclear language in the fire safety provisions can lead to inconsistent decision making.	☐	☐	☐	☒	☐	☐
11.4 The fire safety provisions in the Building Code are inconsistent with other legislation and regulations.	☐	☐	☐	☒	☐	☐

Certainty, clarity and consistency continued: -

Statement 11.1: Gaps in regulation

Any review of the fire provision must be undertaken as part of an integrated system approach covering the life of the building. By this we mean working and aligning with legislation covering,

- the subdivision to ensure utility services for firefighting water,
- access for fire appliance vehicles
- building design and fire design
- building consenting
- construction
- code compliance certificate

- fire evacuation scheme
- maintenance of specified systems (BWoF)
- upgrading existing buildings (alteration, change of use, extension of life) including ANARP
- consistency with other NZBC clauses

This approach will deliver ownership and a uniting of industry for a coordinated implementation of new fire provisions.

Statement 11.2: classify buildings

Streamlining the way buildings are classified will help to reduce confusion and assist with efficient fire and building designs. Building use classifications cannot be done for fire only as this will not solve the problem and cause more confusion for establishing compliance with other NZBC clauses. Building use classifications need to be applicable to all NZBC clauses. As an example, Importance levels for fire have been adapted from Structural Standards, confusing as there are two sets of importance levels.

Statement 11.3: Unclear language

Unclear language. MBIE needs to lead the way to correct its poor and misleading use of critically specified terms. For example, the annual Building Code update does not update the NZBC (the Building Code) it updates Acceptable Solutions and Verification Methods.

In a petition to the Petitions committee at parliament Christiann van der Pump proposes the removal of a Determination before the issue can be judicially reviewed. While **BOINZ does not agree with this proposition,** the supporting paper highlights inconsistencies in the MBIE Determination process. The determinations are on page 24 – 28 of the paper, which can be found here.

https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/54SCPETI_EVI_6fa7df59-030a-44fb-c2c2-08dc370f2b0e_PETI1124/christian-van-der-pump

Also, see the link below, the LGNZ submission not supporting the idea that BA04 s182 be removed

https://www.parliament.nz/resource/en-NZ/54SCPETI_EVI_6fa7df59-030a-44fb-c2c2-08dc370f2b0e_PETI1954/36a99be977be5499ac1747431a35c47f3f42f73d

The fire safety provisions in the NZBC are written in a totally different way to the other clauses, which is a source of confusion. The Fire Safety Objectives are in a clause on their own, requirements are located in the functional requirements (clause C3.2) and errors (FED leaving vulnerable people and children at risk) are examples of NZBC clauses that should be improved for accuracy, clarity, certainty and consistency.

Statement 11.4: inconsistent with other regulation

As we continue to emphasise an integrated approach is required for fire safety. The NZBC fire safety provisions are used, subject to ANARP for upgrading existing buildings. The Building (Specified Systems, Change the use, and Earthquake prone buildings) Regulations 2005 has classifications for change of use, based on Purpose Groups, designed for and copied from the acceptable solutions developed for the previous fire NZBC clauses, as a proxy for when a building changes use. This shows inconsistencies with Regulations directly under MBIEs control. Note: Fire Safety should not be the only criteria for consideration of change of use.

If MBIE adopts BOINZ proposal for an integrated approach to fire safety, alignment with other Regulations will need to be considered, such as:

- Subdivision requirement in District plans for the provision of firefighting water. Should the NZBC say 'where fire fighting water is not available at the flow rates and pressure required for the building, adequate firefighting water must be available on the property'?
- the Fire Evacuations Regulations.
- BWoF regime prescribed in BA04, perhaps some specified system will need to be modified, or new specified systems created.

12. Are there any other issues related to certainty, clarity and consistency MBIE should consider?

☐ Yes ☒ No

Covered in Question 11.

13. Do you have any other comments or feedback on the certainty, clarity and consistency of fire safety provisions in the Building Code?

☒ Yes ☐ No

An integrated approach to fire safety in buildings, for the life of the building, to increase certainty, clarity and consistency of the application of the BA04 and the NZBC will facilitate:

- Safer building for building occupiers and users
- Improved building and fire designs
- Shorter design times
- Reduction in RFIs
- Shorter consenting times
- Improved compliance
- Safer and healthier buildings
- Improved safety in existing buildings

5. General questions

14. What do you think are the most important issues MBIE should consider in the review?

BOINZ supports an overarching plan to address all the objectives in this consultation and importantly to have a commitment to an integrated and coordinated approach to fire safety provisions within buildings over the life of buildings.

BOINZ does not support reduction in capital cost to achieve a reduced performance level of buildings. Building safety and fire safety are critical issues.

MBIE can and must adopt clear and consistent language to impart leadership and clarity for sector understanding and comprehension.

General questions

15. If you have any other comments on this review, please say.

BOINZ reiterates the need for an integrated review to meet the project objectives.

16. If you have anything else you would like to tell MBIE about fire safety in the Building Code, please leave your feedback below.

The Acceptable Solutions and Verification Methods will need to be updated to align with changes to the Fire Safety NZBC clauses

BOINZ appreciates the opportunity to provide government and MBIE with feedback on Fire Safety.