

Specialist Trade Contractors Federation feedback on Residential building supplies market study-draft report.

Introduction

The Specialist Trade Contractors Federation is an umbrella group of organisations representing the specialist trades that are the backbone of our building and construction industry.

Our members include specialists in structural steel, windows, electrical, plumbing, gasfitting, drainlaying, scaffolding, heating and ventilation, roofing, precast concrete, ceilings, and wall linings

General

Whilst STCF supports some of the recommendations contained in the draft report, we are concerned that reducing barriers to certification of products does not reflect the overall risk profile of the industry and could inadvertently lead to another “leaky building” crisis. Any savings in price gained through reducing requirements for certification and quality assurance must be balanced against the requirement for long term of products and the substantial costs associated with premature failure of products.

Specific comments on draft recommendations to enhance the regulatory system

- 1. Introduce competition as an objective to be promoted in the building regulatory system.**
The Building Regulatory System is a framework established to meet minimum performance requirements. We do not adding competition as an objective is appropriate.
- 2. Better reflect Māori perspectives in the building regulatory system.**
We do not have any comments on this recommendation.
- 3. Create more compliance pathways for a broader range of key building supplies.**
We agree with increasing the range of compliance pathways as long as the level of quality assurance is adequate for the risk involved with the product. STCF advocates for compulsory third party certification of all critical building products, which is a higher level of compliance than currently required for some products.
- 4. a. Explore ways to reduce specifications by brand**
STCF agrees with this recommendation.
b. Establish a BCA centre of excellence to facilitate a better co-ordinated and enhanced approach by BCAs to consenting and product approval processes.
STCF agrees there is a need to improve consistency and efficiency across and within BCAs.
- 5. Investigate whether the barriers to certification and appraisal can be reduced.**
STCF agrees with reducing barriers to certification as long as there is an appropriately robust system of quality assurance. Recognition of International Standards will assist in lowering barriers in some instances, but appropriate checks must be in place to ensure products are compatible with other NZ products, systems and environmental conditions.
- 6. Identify and develop methods to centralise information sharing about key building supplies:**
a. Establish a national building products register as a centralised repository for sharing information about building products and consenting.
STCF agrees this recommendation.

b. Establish a BCA centre of excellence to facilitate a better co-ordinated and enhanced approach by BCAs to consenting and product approval processes.

STCF agrees with this recommendation.

- 7. Promote compliance with the Commerce Act, including by discouraging the use of quantity forcing supplier to merchant rebates that may harm competition.**

STCF agrees with this recommendation.

- 8. Further consider the economy wide use of restrictive land covenants and exclusive leases.**

STCF agrees with this recommendation.

Contact STCF

For any questions regarding this submission, please contact

[REDACTED]

President

[REDACTED]