



Residential Construction Sector Market Study  
c/o Sharon Corbett  
Ministry of Business, Innovation and Employment  
56 The Terrace  
Wellington

Dear Sharon

### **Residential Construction Sector Market Study- NZIA Submission**

Thank you for the opportunity for the Institute to submit on this important issue.

The New Zealand Institute of Architects (NZIA) has been in existence since 1905, and is the professional body which represents the interests of over 90% of registered architects in their role as principals and as employers and employees. It liaises with kindred professions and industry participants.

We have consulted widely with our membership on the issues raised in our submission because of concerns we have with many of the Options outlined in Residential Construction Sector Market Study Paper. Our members have raised a range of key concerns and issues. These concerns and other relevant issues are outlined below.

#### **ISSUE: COMPLEXITY AND INACCESSIBILITY OF ALTERNATIVE SOLUTIONS**

**Option:** Sector education about product assurance

The NZIA believes that any education of the industry by MBIE to improve knowledge about product assurance would be beneficial. Whilst this will require a concerted effort and funding from MBIE this should have positive results. What would be helpful is greater education about which materials/systems fit within the Product Assurance Pyramid from high to low risk. The industry, particularly manufacturers, would benefit from improvements to achieve 'lower level' product assurance and have the outcomes accepted by the BCA's.

**Option:** Greater specificity of what is needed for 'lower level' product assurance

Increasing specificity for 'lower level' performance would be a welcome assistance in improving efficiencies in demonstrating Code Compliance. A template would be helpful to ensure consistency which is available to all BCA's. This would eliminate the requirements of manufacturers having to convince every BCA's who have different requirements with a view to improving efficiencies. A National Database of products for BCA's to access would be the best solution so that the manufacturer only has to go through the process once. The system needs to be simplified to encourage improved uptake.

**Option:** Promote better transparency by Certification Providers

The real issue here is that there are no Certification Providers in NZ and until this is rectified manufacturers wanting materials/systems certified will be limited. Increased promotion by the Providers from overseas would prove uneconomic because of the limited opportunity for certification in this market.

**Option:** Reform of BRANZ governance

The NZIA does not agree with a stronger role of government in the governance of BRANZ. The strategic partnership entered into recently by industry and Government through the Construction Industry Research Strategy is the preferable mechanism. It would not allay fears of 'captive' by industry. Overall:

- The NZIA is supportive of an industry based model focused on industry based research. The research has a significant impact on the future direction of the industry including opening possibilities for new and innovative products and systems to enter the market.
- The experience of BRANZ developed through levy funded research and development must be maintained to provide a cost effective appraisal service. However it should not use this comparative advantage in the appraisals market to the detriment of other appraisal providers.
- The NZIA views the connection between BRAC and BRANZ as a positive one, with research and investment as a priority.
- The NZIA views its current representation on BRAC as positive for the architecture profession, not only in influencing BRANZ direction, but also to push out information to members.
- If the government had been considering a stronger role for itself in the BRANZ governance as a means of keeping members up to date, then this should have been discussed with industry before the release of the Research Strategy for the Building and Construction Industry. The proposed Option is considered inconsistent with this work.
- The NZIA believes that Product Certification is a service that BRANZ should consider offering given the difficulties and costs in accessing overseas Certifier Providers.

**SUMMARY**

**The NZIA believes that better access to Alternative Solutions is important to designers to improve the standards of the NZ built environment by providing innovative design solutions. All options outlined will play their part in achieving this goal. There are other initiatives outlined in this submission that will also contribute.**

**The one Option that will have unintended consequences is the proposed stronger role of MBIE in the governance of BRANZ. This is unnecessary given the agreed Research Strategy.**

## **ISSUE: SPECIFICATION BY BRAND**

**Option:** Prevent specification of 'no substitutes'

**Option:** Require specification by performance

The NZIA has real concerns regarding the two proposed Options preventing specification of 'no substitution' and Specification by Performance. Our concerns are outlined as follows:

### **Prevent specification of 'no substitutes'**

On the face of it preventing no substitution would suggest that there would be greater price competition. But the Option downplays the real cost of allowing substitution which can be substantial. It is also unclear on whether any savings made are passed on to the consumer as this activity is normally driven by the Contractor. The NZIA does not believe that this happens frequently.

Our full submission on this Option is as follows:

- The NZIA firmly believe that the consumer should be free to choose the brands they want specified in their residential construction and it is not up to the Government to tell them what they can or cannot have.
- The NZIA believes that the architect should have the final decision on the materials/products that form part of the Specification and not be pressured by a third party such as a contractor. Such a relationship would only complicate the management of risks and liabilities.
- Not allowing specification by Brand contravenes the right of the building owner to have what they choose/want. Taking away the owners right to choose is not an appropriate method of correcting other problems in the building industry. The Option Paper seems to be focussed on the builder's right to choose what the owner wants, which is a very perverse stance to take.
- The specification reflects the building owners' needs/wants just like the drawings do. To substitute what is in the specification is like changing the drawings. Only the designer can know the complex relationships and requirements that have led to the drawings and specifications. The builder can only look at the result and will probably not understand what formed them.
- Whilst there may be a reduction of cost of substituting other materials based on price, the Options Paper does not recognise the other costs incurred in this process. This can include applying for an amended Building Consent, costs testing the product to ensure that it complies with the Building Code, time taken by the architect to provide all of the relevant material information and Product Data sheets to the BCA, and Construction been held up because of this process.
- Architects frequently specify building materials or products by brand name for reasons of design preference, superior perceived performance, availability of technical literature and support, the reputation of the manufacturer or applicator and the availability of product and/or applicator warranties.
- Convenient product familiarity and proven performance which has stood the test of time, is often seen as representing good value for money and an assurance for

continued product use. Comparing the quality and performance of alternative materials or products demands professional time and its associated cost.

- Products and materials produced locally, or in countries with recognised quality research, control and assurance regimes and with the backing of reputable distributors, provide assurance for architects in their design and specification roles.
- Climate conditions in New Zealand differ markedly from those of many countries, and previous satisfactory performance in one does not translate to compatible performance in use in New Zealand situations. This applies to imported materials.
- Some building materials or products perform an integral part of construction systems, eg- structural, tanking, waterproofing, fire resistance and safety, acoustic performance, etc. The cost implications of a performance failure in these situations are severe, particularly when the long-term durability of the building is compromised. Many architects and their insurers would not willingly venture into this risk territory and expose themselves to certain litigation.
- Secondary materials or products such as kitchen and bathroom ware, light fittings, flooring, decking timbers, have a localised impact and cost if they fail. Brand name substitution might be technically acceptable in such circumstances, but who benefits from the product substitution? Who would become responsible for the legal consequences of the substitution should it result in a detriment to the homeowner?
- There are numerous examples of WHRS building performance failures wherein specified materials and/or products have been substituted by owners, project managers, quantity surveyors and builders, without prior reference back to the product specifier, in the mistaken belief of perceived commercial expediency. Sometimes commercial inducements encourage unmerited product substitution by builders. By comparison, the Code of Ethics for Registered Architects requires them to ensure that they have no material or perceived conflicts with product manufacturers.
- Quality of the substituted material is becoming a serious issue. Many products are finding their way into this country from other countries, where testing and certifications regimes are not reliable and product quality does not meet NZ Standards.

For example, products from China which Contractors want to substitute will need to be tested to NZ Standards to comply with the Building Code adding unnecessary cost and time wastage.

- The Institute's members can provide many examples where products that have been substituted by the construction company or the client that have failed to meet NZS which has caused delays and additional costs. As these are confidential under the contractual arrangements we are unable to specify clients or the project but are willing to discuss this further with the Ministry the circumstances of generic substitution.

An overview of some examples of substitution experienced by architects is:

1. Bathroom Taps imported from China by the client on a major hotel project. The architect specification was for Hans Grohe taps from Germany because of quality, durability, proven performance and warranties. Of concern is that the BCA approved the use of the taps based on performance data from

China. Some 600 Chinese tap sets were installed but on use it was found that the water was contaminated by corrosion of the Brass alloy meaning the water was not fit for human consumption. This was verified by an independent testing laboratory. In addition, it was estimated that these taps would only last 15 years. All 600 taps were replaced with the Hans Grohe taps that were in the original specification. The cost of doing this was substantial.

Of real concern was that this raised issues of Life and Safety.

2. Flooring tiles. The architect specified porcelain wet slip resistance tiles for use in a substantial institution. The Contractor, without the architect's knowledge imported cheaper granite tiles from China that had some tests completed for slip resistance, moisture absorption or compressive strength but these were 6 years old. These tiles were rejected by the architect until the contractor could prove that they met the relevant NZS and Building Code standards. It took considerable time and cost to undertake these tests with resulting delays in construction. The BCA was unaware that the product had been substituted.
  3. Plywood. NZ Plywood was specified in a new house project and the contractor decided to substitute it with Plywood from Australia. The NZ supplier was unable to prove that it met NZ Standards because there was conflict with the Australian manufacturer's test reports. It took one week for the architect to provide the BCA with all of the relevant information and 2 weeks for the BCA to approve. Work on site stopped during this time.
  4. Cavity system. The Contractor wanted to substitute a cavity system manufactured in China which had no testing completed on it. The relevant Standard is NZS 4284. The architects rejected the cavity system until it could be proved that it met the standards. The architect and a façade consultant flew to China on 2 occasions to oversee the tests. It took 3 months of testing to meet the NZS 4284 with considerable costs involved.
  5. Building Papers: Not all building papers or building wraps are the same. Some are designed for high wind conditions for use on specific types of sites, some have fire ratings, some are suitable as backing for brick cladding, others are suitable for direct fix to metal and many of those substituted are not suitable for the location they end up in and do not perform as intended by the architect.
  6. Another problem is incompatible building products may end up in close proximity and result in a chemical reaction that was not anticipated by the designer when designing to shed water from the building. The net result is that the substituted product may invalidate the warranty on another product.
  7. We have seen product substitution signed off by Councils throughout the country as being correct all too often. These are very costly to fix especially on large complex builds.
  8. The NZIA has many other examples including BCA's signing off substituted products without the knowledge of the architect.
- Architects also rely on the technical backup of product manufacturers which provides a level of confidence in the system and decisions made.
  - The Options provided assume that all products are only selected for their low cost or technical superiority. This is an oversimplification. Most products are chosen for a mixture of reasons like value, appearance, expected durability, low maintenance,

brand value, accessories, colour, the list goes on. This is particularly true with houses.

- There are a number of proprietary systems that architects will not be willing to allow substitution and generally the BCA's will not either. These relate to:
  - Waterproofing membranes, internal and external
  - Inter-tenancy Fire and Acoustics
  - Sealants
  - Structure
  - Moisture
- Builders in the residential market often do not have the necessary knowledge about products, materials, and systems if they have not been previously used. Often they have very little knowledge of material or building science and unfortunately many of the building supply companies also lack this important base information.
- It is not uncommon for specifiers to have selected suppliers competitively price acceptable products before settling on the final choice. This can then be specified as a special supply direct to the contractor at the agreed supply price who then puts his/her margin on this. Specifiers frequently carry out various comparisons on a range of products as part of the selection process before naming it in the specification. Good designers/specifiers do not select products on a superficial level; it is done with reason and rigour.
- Specifiers sometimes work directly with product suppliers to establish the most cost effective solution for the specific project. This may rely on direct purchase from the product supplier and not through a general building supplier. The general building supplier system is as much a problem in the industry as it is a help to busy builders. The building suppliers generally only consider what materials are required on a very superficial level. Often they do not understand the project requirements in detail (they probably have not been given them), to them one material is much like another, as long as they stock it or can source it. The idea of substitution needs to be based on a fair comparison. Their approach and options outlined in this paper fails to acknowledge the inter-relationship and criteria used to specify products.

### **Require specification by performance**

The NZIA agrees that specification on the basis of performance alone adds very little in the way of concrete performance indication to the requirements of the Building Code and could serve to shift difficulties further down the process to the inspection phase.

The real impediment to specification by performance is that there is no performance based Building Code so on what basis are products or systems assessed?

The NZIA believes there are other issues to consider:

- Specification by performance was first introduced into NZ by the Building Act 1991 and continued by its successor in 2004. Problems existed then, and continue with BCAs lacking sufficient building science expertise to adequately assess the performance potential of alternative innovative building design solutions. Common sense is sometimes lacking when inspectors become overwhelmed with caution and fail to exercise informed judgement when processing building consent applications.

BCA's and their insurers have lobbied Government to remove the legal liability arising from any failure to adequately process building consents. Even BRANZ Appraisals have not been immune to professional criticism and some acceptable solutions likewise.

- Architects should not be held legally liable for defects in the performance outcomes of manufactured building materials or products, as they currently are with Joint and Several (J&S) liability. They should be entitled to rely upon the published technical product data and recommendations. Many representations made by some product manufacturers have been narrowly promoted and construed, to the detriment of many buildings and their designers; eg fibre cement sheets, plywood sheets, timber preservation, building papers, paint finishes, acrylic membranes, sealants and reinforcing steel, stainless steel, etc.
- The BCA's risk aversion to accepting Alternative Solutions will potentially increase if they are required to process Building Consent applications with products which are specified by performance.
- The NZIA do not believe that the BCA's have the necessary skills and experience to be given this responsibility as this system does not show them how the product meets the requirements of the Building Code.
- Furthermore at the inspection stage we foresee difficulties as it must still be determined that the product eventually used actually meets the performance requirements specified in the plan.
- Naming a product in a specification is one of the recognised methods of writing specifications; it is called the Direct Method. This is a shorter and clearer method than, say, the Performance Method, which for some products can get very long and complex. Performance Methods can be relatively simple for simple materials like, say, corrugated metal roofing but very complex for some building systems and fittings (i.e., a tap). With every performance specification there must be the requirement for proof of performance, before and after installation. This can be a costly exercise, particularly for small projects.
- It costs more to write the Performance Specification, the builders submissions cost more, the submissions have to be assessed, possibly by a number of consultants or experts, the product has to be proven as compliant which can be expensive. Related items are also affected, project design might have to be adjusted, shop drawing may be required, as-built documents may need to be done, submissions to BCA's may also be required. All of these will cost more, and who pays.  
It is highly likely that cost savings on the item will be eroded on a small project and it is quite possible that time delays may occur. Substitution can in some cases end up costing more over all for no real benefit.
- The testing regime in New Zealand is inadequate to cope with such a change as a multitude of manufacturers will be seeking appraisals based on performance.
- The real problem will be imported products. How will the BCA be able to determine whether these products meet the performance specification in the plans and specification documents?

## SUMMARY

**NZIA does not support any move to prevent the specification of “no substitutes” unless there are accompanying legislative changes which lessen the current inequitable outcomes of joint & several tort liability upon building design professionals.**

**It is however acknowledged there will be situations where the architect approves substitution of low risk products as long as all the documentation is provided to show Building Code compliance. The NZIA is supportive of this type of initiative.**

**NZIA does not support specification “by performance” because of the associated litigious arguments and liability risks faced by building designers under the current joint & several tort liability rules.**

## ISSUE: RISK ADVERSE BEHAVIOUR

**Existing work:** Law Commission review of joint and several liability

The NZIA has made a submission to the Law Commission supporting a move to Proportional Liability. Its introduction would be the greatest facilitator to reducing risk adverse behaviour by BCA's, architects and the wider construction sector.

Joint and Several provisions in their current form are a huge disincentive to design innovation and the basis of much conservatism in design and product specification. For example the current conservative remediation recommendations of many building surveyors and their influence upon the product specification requirements of the Ministry of Education, which exceed the minimum requirements of the NZ Building Code.

**Option:** Recognise manufacturer warranties in liability and consenting

The NZIA's observations are:

- Recognition of manufacturers' warranties will not make BCA's less risk adverse as warranties are quite specific and detailed, allowing the manufacturers to avoid some of the liabilities that BCA's would like to cover. In addition some suppliers may go out of business during the warranty period. Also to note is that the warranty may be for less than 10 years, particularly separate installer warranties. Normal commercial requirements will not always satisfy Building Code requirements.
- Acceptable Solutions have become the only thing that the BCA's want to deal with. Verification Methods are almost too hard for them and they have made the bar so high for Alternative Solutions it is almost impossible to get consented. The current system is hugely impacted by risk aversion tendencies. The proposal looks to increase this.
- The concept of BCA's being liable for how a building is built on site is a little odd. Being liable suggest a high level of quality control and management of projects by BCA's. This is totally impractical; they have neither the expertise nor the time (and related budget) to spend on site that would be sufficient to act as quality controllers. Liability should be removed from BCA's for the performance of the builder on site, it



should be up to the builder to prove his/her performance and that the resulting building complies with the Consent Documents. This would have the added benefit of reducing consent fees and down time related to inspections.

## **SUMMARY**

**The NZIA does not believe that recognition of manufacturers' warranties in liability and consenting will mitigate BCA's risk adverse behaviour.**

### **ISSUE: LIMITED AVAILABILITY OF ACCEPTABLE SOLUTIONS**

**Option:** Further government funding of Acceptable Solutions

Any additional government funding invested in the development of Acceptable Solutions to promote competition from innovative systems would be welcomed. Unfortunately, too many innovative systems do not progress to obtaining appraisals because of the cost and time in relation to their market potential.

It is important for the design quality of the built environment that New Zealand designers have access to the most up to date innovative solutions which are not precluded from that market because they are an Alternative Solution with all of the associated costs of demonstrating compliance. Other observations are as follows:

- MBIE and BCA's do not seem to be on the same page when it comes to Alternative Solutions. Unfortunately BCA's seem to resist pressure from MBIE when they perceive it increases their liability.
- Some BCA's set the bar too high for proving compliance of an Alternative Solution, even if it exceeds the levels of Acceptable Solutions.
- One of the frustrations with Alternative Solutions is the lack of comparison or standardisation with overseas Standards. Many overseas products are tested to very good overseas Standards, but cannot be assessed relative to those Standards in the Building Code. It would be beneficial if the Building Code referred to major overseas Standards as alternative methods of meeting the Verification Methods. This would make proving compliance by Verification Method much quicker, simpler and cheaper.
- MBIE need to reconsider the format of the Building Code and how they maintain it. The Acceptable Solutions are poorly structured and formatted and make updating difficult. This leads to very slow updating that is often outdated by the time it is published. The system is incapable of keeping up with change except when circumstances force it to eg Christchurch Earthquake although this produced its own set of challenges.

In addition:

- It is important that research is undertaken in the development of Acceptable Solutions.
- Standards based on overseas research need New Zealand testing because conditions and potential effects can be significantly different.

- From experience, it is sometimes more cost effective and affordable to develop an Alternative Solution using a Verification Method rather than an Acceptable Solution eg Fire Safety C1-8 and C/VM1
- Climate conditions in New Zealand differ markedly from those of many countries, and previous satisfactory performance in one does not translate to compatible performance in use in New Zealand situations.

## **SUMMARY**

**The NZIA believes that all four options raised in the Options Paper would be required to be implemented to improve the market for Acceptable Solutions.**

## **ISSUE: INEFFICIENT AND INCONSISTENT CONSENTING BEHAVIOUR**

**Existing work:** National Online Consenting

The NZIA supports the development of a National Online Consenting system

**Option:** Residential risk-based consenting

The NZIA is supportive of Residential risk based consenting and are keen to be involved in its development. We encourage the Ministry to develop an appropriate range of architects' projects that can be included. If the consenting solution can be developed to include architect designed residential, this would be well received as members are becoming increasingly frustrated with the growing complexity and documentation requirements associated with relatively minor work. Inconsistent consenting and widespread variability of documentation requirements across the BCA's is causing unnecessary delays and costs in the system. These costs are eventually borne by the homeowner

The inconsistent use of Producer Statements, PS1, PS2 and PS4 by BCA's which clearly are not mandatory under the Building Act 2004, are used periodically and inconsistently as a means to obtain more information from the designer. In essence the request is often made to shift as much risk as possible away from the BCA's. In summary these statements are not been used as originally designed. We would appreciate further guidance from MBIE on the use of Producer Statements.

Other issues that we believe need consideration:

- We understand that the proposal is for simple residential work at the lower end of the risk matrix in the first instance.
- BCA's currently have problems processing consent applications for Alternative Solutions. The NZIA does not believe that the BCA's could accommodate Risk based consenting for architect designs at this stage.
- Nothing will change with the BCA's for moderate to high risk residential with the existing consenting and inspection regime prevailing.
- Like Risk Aversion, removing liability for how a building is built on site from the BCA's, would relax the BCA's approach to the Consenting process. This would reduce Consent times, costs and inspection requirements, but places greater

responsibility on the builder to build to the consent documents (which they should anyway) and prove it.

## **SUMMARY**

**The NZIA believes that when risk based consenting is introduced it should improve the efficiencies and consistency of the consenting process across all BCA's with a resultant reduction in the time to process a building consent and compliance costs. It is important that risk based consenting is applied to all residential building work including architects designs as soon as is reasonably practical.**

## **ISSUE: LIMITED INTRODUCTION AND DIFFUSION OF INNOVATIVE PRODUCTS**

### **Option: Social housing as 'proof of concept'**

The NZIA is of the opinion that it would be more prudent if social housing portfolio focused on trialling improved management practices to reduce build times, reduced rework with eventual cost savings as 'proof of concept' as outlined in the Options Paper. Such work would ensure that the Building Code is continually being reviewed to ensure system efficiencies and process improvements.

The NZIA does not believe that the use of social housing, which includes the redevelopment of the state housing portfolio, is the most appropriate mechanism to trial the efficiency and cost effectiveness of new construction systems and techniques to demonstrate 'proof of concept'. It seems at odds that social housing which is focused on meeting the requirements of the building code using Acceptable Solutions should be testing new innovative systems that will invariably be an Alternative Solution. This has the potential to create unnecessary time and costs to projects and their code compliance.

### **Option: Innovation network**

Until a framework has been developed on how an Innovation Network may operate it is difficult to comment as to whether it would improve the introduction and commercialisation of new construction systems and products adapted overseas into New Zealand. Another question is where the funding for this initiative would come from?

Introduction of new systems will only occur if the commercial imperatives of manufacturers and suppliers are met.

The NZIA is of the opinion that we should not be introducing innovative products and systems for innovation sake. They must be able to demonstrate that they add value in terms of efficiencies, cost savings and providing better quality housing for New Zealanders.

### **Option: Criteria to promote innovation through BRANZ use of the Building Research Levy**

- The NZIA are in agreement that the Levy is well spent as innovation and new building materials is part of the selection process and it is consistent with the Industry Research Strategy

- Opportunities exist to develop it along the lines of the Science Innovation Fund for which has been very positive
- The NZIA would not want to see all of the levy been used for innovation as there is still a requirement to understand existing conditions
- Through the NZIA representation on BRAC and BRANZ strongly support the use of the levy as they are at the forefront of specifications
- Government needs to promote better education and skills training in the construction industry.
- Buildable is a term that is often bandied used. The problem is that it is undefined and not specific. Buildable means different things to different builders. What one builder considers buildable, due to his/her skills, plant or favoured techniques, to another builder may not. So although buildable may in some circumstances be desirable, the term is often misunderstood and/or misrepresented.

**Option:** Targeted education

The NZIA supports targeted education.

## **SUMMARY**

**The government has an important role to play in promoting innovation in the residential construction sector. However this must be progressed in partnership with industry using the research base and experience of BRANZ to facilitate this. A combination of all Options would be helpful to see a greater uptake of innovation in this sector.**

## **ISSUE: INEFFICIENT CONSTRUCTION MANAGEMENT PRACTICES**

**Option:** Industry education programme

The NZIA supports industry education to LBP's design and site licences to promote understanding and use of new technologies and construction management practices.

A key to improving construction management in New Zealand is requiring builders/main contractors to be LBPs. This would expose builders to the same LBP regime that everybody else has to meet, including the on-going education requirement. Builders must become LBP's, their organisation and supervision of their building contracts is a major contributor to the finished product and the efficiency of its delivery. Builders must be held to account by, and encouraged to improve through, the LBP scheme.

**Option:** Licenced Building Practitioner (LBP) requirements

The NZIA strongly believes that Continuing Professional Development (CPD) for LBP Design 2&3 Licences should be mandatory given the nature of work undertaken by these LBP's. The CPD programme should be rigorous in its standards and requirements and LBP's who do not meet the CPD criteria should be re-assessed to ascertain whether they meet the criteria to hold a Design Licence.

CPD for Registered Architects is an excellent model that a LBP CPD Programme should follow.

In this model all Registered Architects are required to undertake CPD to demonstrate competency and currency of their knowledge across four competencies, Design, Documentation, Project Management and Practice Management to be eligible for on-going re-registration. They need to accumulate 1000 CPD Points over five years with a minimum of 100 CPD Points in each of the four competencies. If they fall short, they are required to undertake a desktop assessment.

Those architects who accumulate only a small number of CPD Points are required to have a face to face interview with 2 NZRAB Assessors. To accumulate 1000 CPD Points or 200 per year they need to undertake approximately 25 hours of CPD per annum.

Architects can achieve points across a number of activities but fundamental to the programme is a quality assessment of all activity undertaken to ensure that the CPD is of a high standard and is relevant to the practice of architecture.

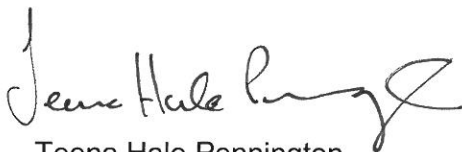
## **SUMMARY**

**Education and a mandatory Continuing Professional Development for LBP Design and Site licence holders are the most efficient ways to promote more efficient management practices in the industry.**

As you can see, the discussion document raises a number of critical issues for architects and the construction industry systems and processes. The Institute requests the opportunity to discuss these concerns and viable solutions further with the Ministry. We would be happy to convene a panel of architects to assist these discussions.

We look forward to further discussions on these issues.

Kind regards



Teena Hale Pennington  
Chief Executive

*Cc. Duncan Joiner, Chief Architect  
Adrian Regnault, General Manager Building Systems and Performance*