

21 October 2018

Healthy Homes

Ministry of Business, Innovation and Employment

PO Box 1473

Wellington 6140

Attention: Healthy Homes Standards submissions

By email: healthyhomes@mbie.govt.nz

**SUBMISSION on**

**Healthy Homes Standards discussion document**

**1. Introduction**

Thank you for the opportunity to make a submission on the Healthy Homes Standards discussion document. This submission is from Consumer NZ, New Zealand’s leading consumer organisation. It has an acknowledged and respected reputation for independence and fairness as a provider of impartial and comprehensive consumer information and advice.

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**2.**  **General comments on the discussion document**

We support the introduction of the Healthy Homes Standards and are pleased to see the government taking action to improve the quality of rental homes.

A large proportion of the population now rents. However, the quality of our housing stock is not high. Research shows rental properties are more likely to be of poor quality than owner-occupied properties. In our recent rental survey, only four out of 10 renters reported living in warm and dry homes.[[1]](#footnote-1)

The social and economic costs of poor housing conditions are well-documented. To address these costs, our preference is for the adoption of the most rigorous standards proposed in the discussion document. In our view, these standards are more likely to meet the objective of providing tenants with warm and dry homes.

**3.** **Answers to specific questions**

***Do you support option one or two for the location of heating devices that landlords must provide in rental homes? Please explain your reason.***

In our view, option 2 would be more likely to meet the objective of a warm, dry home than option 1. It will also provide better health outcomes for children and vulnerable consumers.

***Do you support option one or two above on whether landlords should provide heating devices that are capable of reaching 18°C or 20°C in room(s) covered by the heating standard?***

We support option 2. The World Health Organization recommends a minimum room temperature of 20°C for the sick, disabled, very old or very young. Given the growing proportion of young children living in rental accommodation, we consider option 2 would deliver better outcomes.

***Do you support option one or two for heating devices to be provided by a landlord in a rental home?***

We support option two. Requiring landlords to provide fixed and portable heating devices to heat required rooms would be the best option to ensure required temperatures are met.

***Do you agree that a class of acceptable heating devices is created for those devices that are efficient, healthy and affordable for the heating standard? Please explain.***

Yes, we agree that a class of acceptable heating devices is created for devices that are efficient, healthy and affordable. This would help tenants by eliminating the use of unsafe, expensive or inefficient heaters.

***Do you agree that the heating devices listed above should not be acceptable for the heating standards? Please explain.***

We agree unflued heaters, open fires, electric heaters with a capacity greater than 2.4kw (except heat pumps) and the use of multiple portable electric heaters in one room should not be acceptable.

All these sources of heat are either inefficient, hazardous to health or comparatively expensive to run. In our view, unflued LPG heaters should never be used indoors.

***Which of the options (one, two or three) for the minimum level of insulation required do you support? Please explain***

We support option three. Given there are no requirements for landlords to install wall insulation, we support the higher levels of ceiling and floor insulation. This option will benefit the highest number of rental homes.

***Do you agree that the exceptions set out in 2016 regulations should continue under the proposed insulation standard (e.g. when it is not reasonably practicable to install insulation)? Please explain.***

We agree the exceptions set out in the 2016 regulations should continue. However, if it’s not reasonably practical to install insulation, landlords should be required to consider what other steps they could take to improve the property’s thermal envelope.

***Do you think any other requirements for insulation should be included in the standard and, if so, what?***

We think landlords should be required to provide well-fitted, floor-length curtains in all bedrooms and living areas to help prevent heat loss.

Our tests of sill and floor-length curtains confirm that floor-length options are more effective at retaining heat than sill-length curtains.[[2]](#footnote-2)

To assist landlords and tenants, we recommend a simple guide be produced to help ensure curtains are well-fitted.

***Do you support option one or two to assess a “reasonable condition” for insulation? Please explain.***

We support option two to assess a “reasonable condition” for insulation as it is likely to better meet the objective of making rental homes warm and dry.

Option two could also result in a reduction in energy use, lowering power bills for consumers.

***Do you agree landlords should show compliance with the insulation standard by retaining particular records? If so, which records should be retained? Please explain.***

Yes, we agree landlords should retain records to show compliance with the standards. As long as the information shows compliance, we do not have a preference for whether the record is documentation of the insulation’s R-value, compliance with the Building Code or another type of compliance record (such as an independent inspection report).

***Do you support option one, two or three to provide adequate ventilation in rental homes?***

We support option three as it addresses the main sources of moisture in the home and is most likely to achieve the objective of a warm and dry home.

***Do you agree that exemptions should be available for certain rental homes from requiring openable windows?***

We agree there will be a limited set of circumstances in which exemptions from requiring opening windows may be appropriate.

***Do you support option one or two above to address the problems identified with moisture ingress and inadequate drainage in New Zealand rental homes?***

We support option two as it targets the main external sources of moisture issues that affect rentals.

***Do you support option one or two above to stop draughts and create warm and dry rental homes? Why?***

We support option two as it is more likely to achieve the stated objectives.

***Do you support option one, two or three above for the date that landlords need to comply with the standards for their rental homes? Why?***

For practical purposes, we consider staggered implementation dates (by standard) may be preferable to allow planning and spread financial costs.

***What could be included on the tenancy agreement to show the landlord has complied with each healthy home standards?***

Tenancy agreements could include a simple checklist that the landlord must complete, showing how the home complies with the standards. The checklist could include details of the insulation (e.g., R-value), heating and ventilation installed.

We consider penalties should apply where the landlord fails to provide the information or provides false information.

Thank you for the opportunity to make a submission on the discussion document. If you require any further information, please do not hesitate to contact me.

Yours sincerely



Sue Chetwin

Chief Executive

1. Our nationwide survey of 1062 consumers who rent their home was carried out online between December 2017 and February 2018. [↑](#footnote-ref-1)
2. https://www.consumer.org.nz/articles/curtains [↑](#footnote-ref-2)