

IPENZ SUBMISSION ON THE CONSULTATION FOR AMENDING ACCEPTABLE SOLUTIONS AND VERIFICATION METHODS

**SUBMISSION TO: COMPLIANCE SOLUTIONS TEAM, MINISTRY OF
BUSINESS AND INNOVATION**

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BACKGROUND TO IPENZ

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. It has approximately 17,000 Members, including a cross-section from engineering students, to practising engineers, to senior Members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest giving a learned view on important issues, independent of any commercial interest.

EXECUTIVE SUMMARY

IPENZ is supportive of MBIE updating Acceptable Solutions and Verification Methods to reflect changes in standards. IPENZ is also supportive of changes to text to clarify intent.

Feedback from our Membership has highlighted some instances where we feel the changes proposed reduce clarity and could lead to wide ranging interpretation and confusion. IPENZ has detailed these instances in this submission with recommendations on how improved clarity could be achieved.

IPENZ is supportive of all questions not commented on.

IPENZ has also provided Comment 4 which relates to an equation in B1/VM4 that needs clarifying but was not specifically mentioned in the proposed changes.

SPECIFIC COMMENTS

Comment 1

F/AS1– clause 1.2

We believe that the proposed changes provide less clarity than the current text. The Limits on Application must be made more specific in order that interpretations are reasonable. IPENZ believes that the proposed changes will result in Building Consent Authorities (BCAs) requiring many more instances of emergency lighting in small –medium buildings than is currently the case, increasing costs for clients. The new wording could be interpreted literally such that there are unintended consequences, for example

- Interpretation of when an escape route is not 'level'. Clearly small changes in the height of the route should not justify emergency lighting; what is an acceptable change in level justifying emergency lighting needs to be defined.
- Related to this is the "within 20m" Limit of Application. There could be instances where occupants of the same but large room could have this rule applied differently depending on where in the room they are located.
- The use of the word 'familiar' could be interpreted that for many small restaurants and businesses operating in low light levels patrons would be unfamiliar with an escape route, therefore requiring emergency lighting in all cases.
- How to interpret what makes risks 'low' or when it is deemed low via changing use and daylight/low light conditions is not sufficiently clear.

We suggest that the existing text is retained or alternatively further clarification of the limits to avoid unreasonable and literal interpretations of this new wording as discussed above.

Comment 2

F8/AS1 – clause 4.1.1

We foresee that a multitude of interpretations of what is "clearly visible" will result in confusion amongst engineers and BCAs. We feel the additional text doesn't clarify this. This clause could be interpreted such that an owner would have to provide exit signs in single offices, small rooms and small dead-end spaces, for example.

It is widely considered reasonable for someone to move a few metres to be able to see an exit sign. We would like the term "clearly visible" to be defined in order to provide workable and reasonable requirements for exit signage.

Comment 3

F8/AS1 – clause 4.5.1

We feel there is still ambiguity with the proposed change in text in regards to whether all signs need to be lit if there is no emergency lighting. We recommend this be addressed.

We would also request consistency in terminology regarding the various and confusing uses of the terms "emergency lighting system", "lighting systems", "other systems", "systems for visibility". We believe the terms are being used interchangeably and require better definition. Without improved definitions it could be interpreted that a "system for visibility" could be used and therefore no "emergency lighting system" would be needed, where indeed it needs to be to be code compliant.

Comment 4

B1/VM4 – clause 3.3.2.b

We would like to draw MBIE's attention to an existing equation that is not part of the proposed changes but that needs to be amended

b) Depth factors: λ_{cd} , λ_{qd} and λ_{yd}

where:

- for $\phi = 0$ and $\frac{D_f}{B'} \leq 1$:

$$\lambda_{cd} = 1 + 0.4 \text{ and } \left(\frac{D_f}{B'} \right)$$

The definition of λ_{cd} contains an “and”. Please amend this definition as it is unclear as currently drafted.

CONCLUSION

We appreciate the opportunity to make this submission and are able to provide further clarification if required.

For more information please contact:

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