



6 December 2024

Building Code Fire Safety Review
Building System Performance
Ministry of Business, Innovation and Employment

By email: building@mbie.govt.nz

Tēnā koe

RE: BUILDING CODE FIRE SAFETY REVIEW 2024

Thank you for the opportunity to submit on the Ministry of Business, Innovation and Employment's (MBIE) consultation on the Building Code Fire Safety Review 2024. This submission reflects the views of Engineering New Zealand.

Engineering New Zealand welcomes this Review and agrees change is needed. We agree with the outcomes you have identified and that the current fire safety measures in the building code system are not performing against these outcomes. We consider there is growing evidence that this Review should be expedited.

We support the submissions from our technical groups - the Society of Fire Protection Engineers New Zealand (SFPE) and the Institution of Fire Engineers (IFE) New Zealand Branch. They cover many points that are integral to improving our fire safety standards. We highlight a couple below:

- 1. Integration of fire safety requirements:** It is important that all the regulatory and guidance material be integrated and use the 'Life of a Building' approach - helping ensure the alignment and connection between the information and parties throughout the construction, use and change to the building. Addressing concerns around fire safety during construction can help better ensure Fire and Emergency New Zealand's operational requirements for evacuation and firefighting are sufficiently met through the construction of a building, as is the intent of section 47 of the Building Act.
- 2. Clarity on interpretations, definitions and exemptions:** We support the view from both Groups that a review of the legislative interpretations, definitions and exemptions is warranted to make sure they are clear and consistent and align with the review outcomes. It is also important that all parties have an agreed understanding and way of using them and that there is sufficient training to help with this.

Occupational regulation

Building and designing for fire safety is inherently high risk. It is our view that individuals undertaking this work must be suitably qualified and registered. To this end, we recommend engineers signing off fire safety work be chartered professional engineers (CPEng).

Conclusion

Engineering New Zealand recommends the Review progress as a matter of priority. We encourage you to carefully consider the views of our technical experts and their submissions and to closely work with them to strengthen the fire safety provisions.

Engineering New Zealand appreciates the opportunity to provide feedback and looks forward to engaging in the next phase of the reform when options to address these issues are available for comment.

If we can be of any assistance or provide further information, please do not hesitate to contact us.

Nāku, nā

A handwritten signature in blue ink, appearing to read 'R. Templer', written in a cursive style.

Dr Richard Templer
Chief Executive