Organisation

Address

Phone Number

Contact Name/Email

Submission on Healthy Homes Guarantee Act Healthy Homes Standards

About ORGANISATION

Provide a brief paragraph on your organisation, where you operate and who you work with, in particular if most or many of your constituents are renters.

General Comments

ORGANISATION is supportive of setting high standards for rental housing in regards to making tenanted properties warmer, healthier and more energy efficient. Legislative action is imperative for wholesale change to occur with our rental housing stock, which is largely substandard based on global standards and evidenced by local research conducted by BRANZ and other independent entities.

1 - Heating

*1.1 – heating location*

ORGANISATION supports Option Two – landlords must supply heating appliances in the living room and bedrooms.

For biggest impact, heating appliances should be provided by landlords in the living areas and the bedrooms. If efficient heating is provided, tenants will have more choices in regards to the health and temperature of their homes.

*1.2 – online tool to determine adequate heating devices*

ORGANISATION supports an online tool for calculating what type of heating (fixed or portable electric) is appropriate in living rooms and bedrooms. This tool should be accessible to both landlords and tenants, and should have the ability to generate an easy-to-read report for a given property, which should be included with every tenancy agreement.

*1.3 – achievable indoor temperature*

ORGANISATION supports Option Two – heaters must be capable of achieving an indoor temperature of at least 20C.

Some of our most vulnerable residents are children, elderly and those with existing health issues. The higher indoor temperature is a healthier environment for that cohort. This is supported by significant medical research and is a reasonable standard to achieve once other Healthy Homes standards are met (ex: insulation and moisture control).

*1.4 – fixed heating only where portable heaters insufficient*

ORGANISATION prefers fixed heating in living areas and bedrooms, with the exception that, where portable electric heaters are deemed adequate to achieve 20C in a bedroom, that those devices can be used, but should be affixed to the wall. This is a health and safety issue as well as more likely to keep the heating devices with the property and in good condition. This also allows tenants who may not prioritise purchasing heaters to have access to a heating device capable of achieving a healthy temperature. Landlords should provide these devices. Although many tenants will choose not to use bedroom heating, the option should be readily available.

*1.5 – acceptable heating devices*

ORGANISATION suggests that the following heating sources be deemed unacceptable under Healthy Homes Guarantee standards:

* Open fires
* Unflued gas heaters
* Electric heating devices above 2.4kw (other than heat pumps)
* Multiple electric heating devices plugged into one room
* Coal burners

Although coal burners are not listed in the discussion document, they are a significant source of air pollution, contribute to poor indoor air quality and produce harmful greenhouse gases. Asthma is common in our region and is exacerbated by coal burning, either in the house or in the neighbourhood.

2 – Insulation

*2.1 – minimum level of insulation in rental homes*

ORGANISATION supports Option Three, which will raise the required level of insulation to current Building Code standards.

Tenanted properties should have the same standard of insulation as required under the Building Code. The Government has deemed that level of insulation is a healthy minimum for new homes, and should give tenants the same opportunity to live in a warmer home that is more efficient to heat.

*2.2 – assessment of insulation degradation*

ORGANISATION supports Option Two, where insulation can shrink or degrade by 10% before needing to be topped up or remediated.

This is a reasonable level of maintenance given the longevity and durability of modern insulation products. This will ensure tenants are living in a home that retains more heat and performs well.

*2.2 – demonstrating compliance*

ORGANISATION agrees that landlords should retain certain records to demonstrate compliance with the insulation standards as above. This could be receipts or invoices for insulation purchase and installation, and photos of the installed insulation in the home. These records should be either attached to the tenancy agreement and/or be publicly available via rates information or other mechanisms. R-values and/or depths of insulation should be included in this information.

3 – Ventilation

*3.1 – level of ventilation*

ORGANISATION supports Option Three, where openable windows and externally vented mechanical extraction fans are required in rooms with a shower, bath or indoor cooktop.

We also think the standards should include ventilating clothes dryers externally, as these also produce a lot of moisture when in use.

4 – Moisture Ingress & Drainage

*4.1 – protecting against moisture and inadequate drainage*

ORGANISATION supports Option Two, installation of ground moisture barriers if vents are not adequate, and that drainage must be efficient.

Damp underfloors are common and problematic. Installing a ground moisture barrier is an efficient measure to prevent rising damp and should be required where possible. Rental properties should also be free from leaks with no broken or blocked pipes, guttering and drains, and should be executed such that no water can pool underneath the house.

5 – Draught Stopping

*5.1 – appropriate level of draught stopping*

ORGANISATION supports Option Two, where the landlord is required to stop unnecessary gaps or holes that cause noticeable draughts.

Draught stopping is a basic maintenance activity and should be undertaken with regularity in rental homes. It is a straightforward measure and should be required.

6 – Compliance Dates

ORGANISATION supports a single compliance date of 1 July 2022.

This is a reasonable date by which landlords can complete the required work if necessary. A single date is less confusing for renters and landlords than a staggered approach.

7 – Implementation

*7.1 – Enforcing the standards*

ORGANISATION supports the requirement that landlords retain certain records to demonstrate compliance, including receipts/invoices, photos of installed products, or other items as deemed appropriate and reasonable by HUD.

A Healthy Homes checklist with each standard listed, with a description of how the home achieves each standard, must be a required attachment to every tenancy agreement.