



COVERSHEET

Minister	Hon Chris Penk	Portfolio	Building and Construction
Title of Cabinet paper	Earthquake-prone building system – Proposed review, extension of remediation deadlines and other matters	Date to be published	15 May 2024

List of documents that have been proactively released		
Date	Title	Author
March 2024	Earthquake-prone building system – Proposed review, extension of remediation deadlines and other matters	Office of Minister for Building and Construction
29 March 2024	Earthquake-prone building system – Proposed review, extension of remediation deadlines and other matters ECO-24-MIN-0043 Minute	Cabinet Office
25 March 2024	Regulatory impact statement - Extension of remediation deadlines for earthquake-prone buildings	MBIE

Information redacted

YES

Any information redacted in this document is redacted in accordance with MBIE's policy on Proactive Release and is labelled with the reason for redaction. This may include information that would be redacted if this information was requested under Official Information Act 1982. Where this is the case, the reasons for withholding information are listed below. Where information has been withheld, no public interest has been identified that would outweigh the reasons for withholding it.

Some information has been withheld for the reasons of confidential advice to Government and protection of legal privilege.

Budget-Sensitive

Office of the Minister for Building and Construction

Cabinet Economic Policy Committee

Earthquake-prone building system – Proposed review, extension of remediation deadlines and other matters

- 1 This paper seeks an in-principle agreement to bring forward a review of seismic risk management and agreement to a four-year extension of remediation deadlines for building owners while this review is underway.
- 2 This paper also signals my intention to work with ministerial colleagues to explore medium-term opportunities to address concerns around earthquake-prone buildings and to generate additional economic, housing and social benefits for New Zealand.

Relation to government priorities

- 3 These proposals align with Government priorities to grow the economy and to deliver more affordable housing.

Executive Summary

- 4 The current earthquake-prone building system was introduced in 2017 in response to recommendations of the Canterbury Earthquakes Royal Commission. The system aims to mitigate the life-safety risk associated with the most vulnerable existing buildings during a moderate earthquake, by requiring territorial authorities to identify, and building owners to remediate (strengthen or demolish) earthquake-prone buildings.
- 5 I propose starting a review of the management of seismic risk to existing buildings in 2024. This reflects concerns raised by building owners and territorial authorities and officials about the feasibility of meeting and enforcing the current earthquake-prone building deadlines, as well as the workability, proportionality, and effectiveness of the current earthquake-prone building system. If Cabinet agrees in principle to this review, I will report back to Cabinet on the scope of the review in May 2024.
- 6 While the scope of the review is yet to be agreed, it is possible the review will result in changes to existing obligations and deadlines for remediation. The review and any subsequent changes to earthquake-prone building system settings are expected to take until the end of 2027 to complete. This timeframe reflects the need for the review's scope to encompass a broad range of settings, and for adequate engagement to ensure any subsequent changes are workable, proportionate and effective.
- 7 There are currently over 5,000 non-lapsed earthquake-prone building deadlines, of which 471 are between April 2024 and the end of 2027. Given the challenges building owners face complying with requirements, the possibility of system changes resulting

from the review, and territorial authority concerns about the cost and feasibility of potentially large-scale compliance and enforcement action, I propose to amend the Act to extend all earthquake-prone building remediation deadlines, excluding those that lapse prior to 2 April 2024, by four years from the deadline stated on their notice.

- 8 This would provide relief from immediate deadlines and certainty about most parties' obligations while the review and any subsequent changes take place. Extending all deadlines, rather than any sub-set, would maintain the current order of deadlines (which is broadly risk-based) and avoid adding to large clumps of deadlines (which may strain sector capacity to deliver the necessary strengthening work).

Ensuring appropriate seismic risk management

Ensuring the earthquake-prone building system is workable, proportionate and effective

- 9 Around 7,200 earthquake prone buildings have been identified. Of these, approximately 1,900 have been removed¹ from the Earthquake-prone Building Register to date, leaving around 5,300 buildings yet to be remediated. There are large clusters of deadlines approaching in 2025 and 2027.
- 10 A number of stakeholders, including some territorial authorities and building owners, have called for a review of the earthquake-prone building system. Based on their input and official advice, I have concerns about the workability, proportionality and effectiveness of the system:
- 10.1 Workability – it may not be feasible or affordable for many building owners to meet their remediation deadlines, or for territorial authorities to take enforcement action if deadlines are missed.
 - 10.2 Proportionality – while many buildings on the earthquake-prone register have significant vulnerabilities that pose life safety risks and need to be addressed, there also appear to be buildings on the earthquake-prone register, in some cases facing imminent remediation deadlines, where the risks posed may not be proportionate to the regulatory burden imposed by the system.
 - 10.3 Effectiveness – the potential issues with workability and proportionality may be impacting the integrity of the earthquake-prone building system, and its ability to effectively achieve its objectives.
- 11 A review of the earthquake-prone building system was expected to be held in 2027. I propose bringing forward a review of seismic risk management in existing buildings, to begin in 2024. The review would seek to ensure the regulatory settings efficiently and effectively protect life safety in the event of an earthquake. Confidential advice to Government
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¹ Buildings are removed when they have been strengthened or demolished, or when additional information is provided that satisfies the territorial authority that the building is not earthquake-prone.

12 I expect the review to consider how well the current system for managing seismic risk in existing buildings is working, identify problems, assess a range of options, and provide recommended actions. I anticipate the scope will include (but not be limited to) such issues as:

12.1 Confidential advice to Government

12.2 Confidential advice to Government

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12.4 Confidential advice to Government

12.5 Confidential advice to Government

13 If you agree in principle to this review, I will report back to you on the proposed review scope and terms of reference by May 2024. I plan to engage with my ministerial colleagues while considering the scope of the review, and at points throughout the review and policy development process.

Providing relief and certainty during the review and any subsequent changes

14 I anticipate the review could be completed Confidential advice to Government. This timeframe strikes a balance between the need to progress this work at pace and the need to ensure sufficient consultation and comprehensive examination of the system. I will report back to Cabinet shortly after the review’s completion.

15 I anticipate the policy work to respond to the review’s recommendations and public consultation on a comprehensive raft of proposals would follow in Confidential advice to Government
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16 I propose that all buildings that have had an earthquake-prone building notice issued but not yet expired, have their remediation deadline extended by four years from the remediation deadline currently listed on their notice. This is intended to provide relief and certainty to building owners during the review period and reduce or avoid expenditure that may not be needed after a review.

17 The extension will be applied automatically to all currently identified earthquake-prone buildings, excluding buildings with deadlines that lapse prior to 2 April 2024.

18 Nineteen earthquake-prone buildings’ remediation deadlines expire in 2024, with the first deadline falling on 5 April. The Government’s intention to perform a review of

regulatory settings and extend remediation deadlines will become known to building owners months prior to legislation taking effect. Regardless of when the legislative changes take effect, I intend for the extension to apply to those notices that expire following anticipated Cabinet decisions. I therefore propose that this legislation apply retrospectively to those notices that expire after 2 April 2024.

- 19 While retrospective legislation is usually best avoided, I consider it appropriate in the circumstances as it provides the small number of building owners in question with a similar level of relief and certainty as building owners whose deadlines fall after commencement. It may also limit the expenditure of remediation or enforcement effort for buildings that may not face the same obligations or deadlines following changes resulting from the review.
- 20 There would be a brief period where these building owners will be in breach of their remediation obligations under the current Act and may be exposed to enforcement action before the proposed amendments are enacted. However, I anticipate that territorial authorities are likely to take a considered approach to managing compliance and enforcement during this period.
- 21 I have considered other options:
- 21.1 *Extending deadlines which have already lapsed.* There are 151 expired deadlines. Building owners that have missed their remediation deadlines have committed an offence under the Act, meaning there is a risk that enforcement action has already been initiated. MBIE will consider issuing guidance to territorial authorities on risk-based approaches to enforcement and to help building owners with lapsed deadlines make good seismic risk management decisions.
- 21.2 *Excluding Importance Level 4 buildings (and Importance Level 5 buildings, if any)*². Initial engagement with some Government owners of earthquake-prone buildings and engineers indicates these owners are facing significant remediation challenges, including a lack of capital funding and the need for buildings (such as hospitals and fire stations) to remain operational at all times. The buildings generally do not pose any additional life safety risk over other earthquake-prone buildings, and many are already on an expedited remediation timeline (due to being priority buildings).

These challenges could result in some of these deadlines lapsing, and an extension of deadlines would provide these owners with more time to comply – while still having earlier deadlines than many other earthquake-prone buildings. Some owners are also developing, or have in place, policies or plans to manage seismic risk in their building portfolio over time and may continue to plan or take steps to remediate their Importance Level 4 buildings during the review period, where possible.

² Importance Level 4 is defined in Building Code Verification Method B1/VM1 as buildings that are essential to post-disaster recovery or associated with hazardous facilities e.g., hospitals and other health care facilities having surgery or emergency treatment facilities; fire, rescue and police stations; and buildings intended to be used as emergency shelters. There are unlikely to be any Importance Level 5 earthquake-prone buildings (ie dams, extremely hazardous facilities).

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- 21.3 *Extending only a sub-set of remediation deadlines (for example, heritage or non-priority buildings).* This would create confusion and fail to deliver the required relief and certainty for those not provided an extension.
- 21.4 *Extending only deadlines ending prior to a set date.* This would have pushed these deadlines to the same time as existing deadline clusters, exacerbating sector capacity constraints by creating spikes in demand for seismic strengthening work.
- 22 I have discounted non-regulatory options such as pausing enforcement as it would be unlawful to direct territorial authorities not to fulfil their statutory obligations.
- 23 A four-year extension is expected to provide sufficient time for the Government to consider the review's findings and complete any subsequent legislative changes. However, it is possible that unforeseen events could delay the completion of the proposed review and subsequent legislative changes. To avoid the situation where remediation deadlines start lapsing again before any legislative changes resulting from the review are complete, I propose an option to further extend remediation deadlines by up to two additional years by Order in Council.
- 24 My recommendation of the deadline extension assumes your agreement to carry out the proposed review. If the review were not to progress, I would report back to you regarding what alternative actions should be taken.

I propose that current support for earthquake-prone building owners be discontinued for the duration of the system review

- 25 The Residential Earthquake-prone Building Financial Assistance Scheme was established in 2020 to provide low-interest, deferred-payment loans to owner-occupiers of earthquake-prone apartments facing financial hardship due to strengthening costs.
- 26 A pilot Earthquake-prone Building Support Service, launched in 2023, provides case management and free specialist advice to owners of 10 multi-unit residential earthquake-prone buildings in Wellington.
- 27 Cabinet authorised the establishment of the Scheme in 2020 and made some changes to its criteria in 2022 to better facilitate loans, however, no loans have been issued to date. Over 2023, a pipeline of demand was established, with over 60 applicants across seven buildings having received a stage one approval, which confirms eligibility but does not guarantee a loan. However, existing barriers such as insurance requirements would need to be addressed in order for many of those applications to proceed to stage two and be approved for a loan. There is also insufficient funding available for all current stage one approved applicants – it is anticipated that up to four buildings (up to 40 people) could be supported within the current appropriation.
- 28 A significant proportion of building owners participating in the Support Service pilot are likely to disengage with their case managers while awaiting outcomes of a system review, particularly as many unit owners within these buildings need financial assistance to proceed with remediation (some are already engaged with the Financial Assistance Scheme, but many are not).

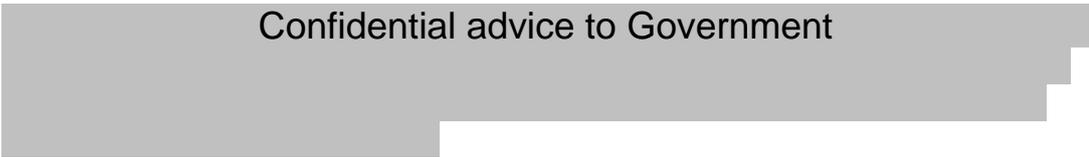
- 29 I recommend disestablishing both the Financial Assistance Scheme and Support Service pilot by 30 June 2024, given the likelihood of owner disengagement during the review and potential that obligations may change following the review's completion.
- 30 I also recommend being authorised to immediately direct Kāinga Ora to close the Financial Assistance Scheme to new applications and cease processing any current applications and instruct both Kāinga Ora and MBIE to commence a wind down period to end by 30 June 2024 for both the Financial Assistance Scheme and Support Service pilot, respectively.
- 31 These support services would be wound down with support and communication to affected building owners, and an evaluation of the Support Service pilot's delivery of support to building owners would be carried out during the winding down period to provide insights for the review of the earthquake-prone building system.
- 32 Future assistance for building owners may be considered within the scope of the review of the earthquake-prone building system.

Exploring medium-term opportunities for good outcomes from earthquake-prone buildings

- 33 While a review is underway I believe there are steps the Government can take in the medium-term to address concerns around earthquake-prone buildings and to generate additional economic, housing and social benefits for New Zealand.

Incentivising the redevelopment of earthquake-prone buildings

- 34 I would like to work with Cabinet colleagues to explore options to incentivise the sale and redevelopment of earthquake-prone buildings, generating wider housing, economic and social benefits for the economy.

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- 36 I see the potential to:

- 36.1 support owners of earthquake prone buildings who currently are unable to remediate due to costs or sell properties at current market value;
- 36.2 support urban renewal and prevent buildings sitting empty;
- 36.3 support the Government's goal of going for housing growth; and
- 36.4 deliver wider economic benefits particularly in major cities such as Wellington.

Removing barriers to urban renewal

- 37 There are several scenarios where owners of earthquake-prone buildings face additional challenges to complete remediation. These include:
- 37.1 buildings in regional New Zealand, where both remediation and demolition of earthquake-prone buildings are often economically unviable.

- 37.2 heritage buildings where district plan rules can require resource consent for changes that affect the buildings' heritage value, including demolition. The resource consent process can be costly and difficult to navigate, with no guarantee of success.
- 38 While I expect the review to consider these challenges, I see an opportunity to move faster in working with Cabinet colleagues to explore ways to provide more options to owners of these buildings, **Confidential advice to Government**
This could provide support for building owners and help remove barriers to urban renewal.
- 39 As the potential actions to unlock these outcomes span a number of portfolios such as Housing, Resource Management, Local Government and Heritage, I intend to continue discussions with Cabinet colleagues to explore options.

Risks

- 40 An extension of remediation deadlines means that life-safety risk remains unmitigated in the over 5,000 earthquake-prone buildings with non-lapsed deadlines for a longer period of time, essentially pushing the whole earthquake-prone system back by up to six years.
- 41 Some buildings are unlikely to meet their remediation deadlines under the current system anyway, so while enforcement action under the status quo could slightly decrease this risk there is not likely to be a significant change in the risk posed by this cohort of buildings.
- 42 Some other owners may continue with remediation plans due to other drivers (such as insurance, increased risk awareness, *Health and Safety at Work Act 2015* obligations), which are expected to continue to incentivise some building owners to manage their seismic risk irrespective of the proposed amendment to the Act.
- 43 However, there is a sub-set of owners who would otherwise remediate during the time in question who may not do so. As the proposed changes would extend all the over 5,000 non-lapsed remediation deadlines, if a seismic event were to occur during the life of the earthquake-prone building system there could be some buildings that pose a greater risk to life safety than if their deadlines had not been extended. It is not known how many buildings would be in this category, and the consequential impact on life safety is not possible to predict as it would depend on the characteristics of the seismic event and when and where it occurred.
- 44 This risk may be partially mitigated, for example through clear messaging and guidance to building owners on how to continue managing their seismic risk using a sensible, risk-based approach. There may be more options to explore, such as encouraging building elements that are known to pose a significant risk, such as unreinforced masonry, to be secured.

Cost-of-living Implications

- 45 I do not anticipate these proposals to affect New Zealanders' cost of living.

Financial Implications

- 46 Territorial authorities will incur administrative costs to implement the extension of earthquake-prone building deadlines, including to re-issue physical earthquake-prone

building notices and amend their internal records – an estimated two hours per notice on average, at an estimated cost of \$120-\$150 per notice, for an estimated total of \$0.620 million to \$0.775 million (total across all territorial authorities and notices).

47 I propose that territorial authorities would be unable to charge a fee for updating notices to reflect the extended deadlines, instead meeting these costs through their own baseline funding. Expenses related to the deadline extension will be lower than the otherwise imminent cost of mass enforcement.

48 Confidential advice to Government

49 Confidential advice to Government

49.1 Confidential advice to Government

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49.3 Confidential advice to Government

50 Confidential advice to Government

51 I will discuss any potential financial implications of the review when I return to Cabinet to set out the scope and terms of reference.

Legislative Implications

52 An amendment to the Act will give effect to my proposals through the Building (Earthquake-prone building deadlines and other matters) Amendment Bill. I sought a category 3 priority rating in the legislative programme, which reflects my intention to have the bill passed by the House in 2024.

53 The Act prescribes remediation timeframes in section 133AM, which are used to set remediation deadlines for individual buildings. The Bill would amend the Act to provide an extension of four years to the individual non-lapsed deadlines in place for earthquake-prone buildings with a current deadline on or after 2 April 2024, and make any necessary consequential amendments to support this extension.

Impact Analysis

Regulatory Impact Statement

- 54 A Regulatory Impact Statement (RIS) for the earthquake-prone building remediation deadline extension has been developed. MBIE's Regulatory Impact Analysis Review Panel has reviewed the attached Impact Statement prepared by MBIE.
- 55 The Panel considers that the information and analysis summarised in the Impact Statement partially meets the criteria necessary for Ministers to make informed decisions on the proposals in this paper. The Panel has given the RIS a partially meets on the basis that one option (Option C) involved a subset of options that would have benefitted from being assessed independently, and that the application of some criteria could have been more consistent.

Climate Implications of Policy Assessment

- 56 The Climate Implications of Policy Assessment (CIPA) team has been consulted and confirms that CIPA requirements do not apply to this proposal as it not expected to result in any significant, direct emissions impacts. This policy may result in some indirect emissions impacts pertaining to waste and industrial processes & product use, but it does not meet the emissions threshold of significance required for a CIPA.

Population Implications

- 57 Earthquake-prone building owners with current deadlines are directly affected, through temporary relief from imminent compliance deadlines. Notable subgroups include owners of provincial, heritage and multi-unit residential earthquake-prone buildings. Further demographic information about earthquake-prone building owners is not available.
- 58 This proposal could have an impact on occupiers of earthquake-prone buildings (eg residential and commercial tenants, visitors and customers) and passers-by (including pedestrians and vulnerable populations, such as people who are homeless).
- 59 These third parties do not face statutory obligations to remediate, but can be exposed to life-safety risk from earthquake-prone buildings that they have little to no means of mitigating. While notices displayed on earthquake-prone buildings provide some warning as to the risk to those who see them, they do not mitigate known vulnerabilities in the building.
- 60 Territorial authorities are key stakeholders that have raised concerns about the viability of the current remediation deadlines. Non-compliance with current deadlines would pose an enforcement challenge for territorial authorities, who are responsible for enforcing the earthquake-prone building provisions. Some territorial authorities, such as Wellington City Council, also own earthquake-prone buildings and face their own remediation challenges.
- 61 Earthquake-prone building owners, occupiers and other residents in regional New Zealand may be specifically impacted by these proposals. Some small, regional towns have a high proportion of heritage earthquake-prone buildings. For example, there are

28 heritage earthquake-prone buildings in Feilding, 14 in Masterton, and nine in Marton.

- 62 These buildings are often located in the town centre, and contribute to the town's economy, as well as often being heritage buildings with special significance. While the building owners will benefit from temporary relief from imminent remediation deadlines, the town itself may also benefit from these buildings having longer to remediate, particularly if there is a greater likelihood of these buildings being seismically strengthened (as opposed to demolished or abandoned).

Human Rights

- 63 The proposals in this paper are consistent with the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993.

Use of external Resources

- 64 No external resources have been used to develop the proposals in this paper.
- 65 The review of the earthquake-prone building system may require external resources, such as consultancy, for example, if the review is not undertaken by MBIE or specialist expertise beyond those available in-house is required. I will provide a full overview of the external resources proposed for use, if any, for consideration when I report back to Cabinet with the review's proposed terms of reference.

Consultation

- 66 The following agencies were consulted in developing these proposals: the Manatū Taonga Ministry for Culture and Heritage, the Ministry for the Environment Manatū Mō Te Taiao, the Department of Internal Affairs Te Tari Taiwhenua, the Treasury New Zealand, the Department of the Prime Minister and Cabinet, WorkSafe, Te Tūāpapa Kura Kāinga Ministry of Housing and Urban Development, Earthquake Commission Toka Tū Ake, and the Parliamentary Council Office.
- 67 Also consulted were government owners of earthquake-prone buildings including: the Ministry of Health Te Whatu Ora, Fire and Emergency New Zealand, and the Ministry of Education.
- 68 Most of the government agencies consulted were generally supportive of the proposals, while noting some potential risks and making some suggestions regarding specific details. The Department of Internal Affairs raised a concern that the integrity of the statutory enforcement role of territorial authorities may be compromised by the proposal for the extension to apply retrospectively to deadlines starting from 2 April 2024, potentially exposing them to legal liability in the event of an earthquake during the period between 2 April 2024 and whenever the legislation is enacted.
- 69 Technical experts were consulted via the Joint Committee for the Seismic Assessment of Existing Buildings, and were supportive of the proposals.
- 70 Five territorial authorities were consulted, and had mixed views on the proposals. Wellington City Council were strongly in support of the proposals; most other councils consulted supported the proposed review but expressed concerns about

extending remediation deadlines, highlighting the life safety risk involved, the loss of momentum towards remediation and the perception that those not complying with the current requirements are being ‘rewarded’ for their complacency.

Communications

- 71 I intend to announce the remediation deadline extension and earthquake-prone building system review once decisions are taken by Cabinet through a press release.

Proactive Release

- 72 This paper will be proactively released subject to redactions as appropriate under the Official Information Act 1982 after announcements are made.

Recommendations

The Minister for Building and Construction recommends that the Committee:

- 1 **agree in principle** to conduct a review of the management of seismic risk to existing buildings starting in 2024;
- 2 **agree** that the Minister for Building and Construction report back to Cabinet by the end of May 2024 with proposed terms of reference for the review of management of seismic risk to existing buildings;
- 3 **agree** to amend the *Building Act 2004* to extend the remediation deadlines for all earthquake-prone buildings that have been issued an earthquake-prone building notice under Section 133AL of the Act, excluding those earthquake-prone building notices which lapse prior to 2 April 2024, by four years from the remediation deadline currently on the notice;
- 4 **note** the Minister for Building and Construction will work with Cabinet colleagues to explore medium-term opportunities to unlock development of current earthquake-prone building sites, **Confidential advice to Government** ;
- 5 **agree** that the extension to earthquake-prone building remediation deadlines will apply retrospectively on and from 2 April 2024;
- 6 **agree** that the amendments set out in recommendation 3 will allow for an additional extension of all earthquake-prone building remediation deadlines by up to two years by Order in Council, including buildings identified as earthquake-prone during the initial four-year period, and excluding those that lapse prior to 2 April 2024;
- 7 **agree** that the further extension may be used only once, for any period of time up to two years; that it must be used by 2 April 2028 or the power is repealed; and that it is to be used for the purpose of ensuring that sufficient time has passed for the proposed review of the management of seismic risk in existing buildings and any subsequent legislative changes to be completed before earthquake-prone building remediation deadlines start lapsing again;

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- 8 **agree** that territorial authorities will be required to reissue earthquake-prone buildings notices with amended deadlines and ensure that notices attached to buildings are updated;
- 9 **agree** that the *Building Act 2004* be amended to prevent territorial authorities charging fees for work they undertake to update the Earthquake-prone Building Register and reissue earthquake-prone building notices as a direct result of the changes proposed in this paper;
- 10 **note** the Minister for Building and Construction expects territorial authorities to take a considered approach to enforcement for lapsed remediation deadlines.
- 11 **agree**, subject to agreement to the above recommendations, to close the Residential Earthquake-prone Building Financial Assistance Scheme and end the Earthquake-prone Building Support Service pilot by 30 June 2024;
- 12 **agree**, subject to agreement to the above recommendations, that the Residential Earthquake-prone Building Financial Assistance Scheme will be closed to new applications and processing of any existing conditional eligibility and loan applications will cease immediately;
- 13 **agree**, subject to agreement to the above recommendations, that the Minister for Building and Construction will immediately instruct Kāinga Ora to enter a wind down period for its functions in relation to delivering the Residential Earthquake-prone Building Financial Assistance Scheme, which is to be completed by 30 June 2024;
- 14 **agree**, subject to agreement to the above recommendations, that the Ministry of Business, Innovation and Employment will commence progressively winding down the delivery of services to participants of the Earthquake-prone Building Support Service pilot immediately, with services to cease altogether and an evaluation to be undertaken by 30 June 2024;

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- 16 **invite** the Minister for Building and Construction to issue drafting instructions to the Parliamentary Counsel Office to give effect to the above paragraphs;
- 17 **authorise** the Minister for Building and Construction to make decisions on any minor or technical matters that may arise during the drafting process;
- 18 **authorise** the Minister for Building and Construction to make decisions, consistent with the proposals in these recommendations, on any issues that arise during the drafting process.

Authorised for lodgement

Hon Chris Penk

Minister for Building and Construction

Appendices

Appendix 1: Regulatory Impact Statement

Appendix 1: Regulatory Impact Statement