

# HAMILTON CITY COUNCIL STAFF SUBMISSION

## CodeMark: Proposed Transition to New Mark of Conformity (November 2022 Consultation Document)

Ministry of Business, Innovation and Employment



20 December 2022



**Hamilton  
City Council**  
Te kaunihera o Kirikiriroa

# Improving the Wellbeing of Hamiltonians

Hamilton City Council is focused on improving the wellbeing of Hamiltonians through delivering to our five priorities of shaping:

- **A city that's easy to live in**
- **A city where our people thrive**
- **A central city where our people love to be**
- **A fun city with lots to do**
- **A green city**

The topic of this submission is aligned to the priority '**A city where our people thrive**'.

## Council Approval and Reference

This submission was approved by Hamilton City Council's Chief Executive on 20 December 2022.

Hamilton City Council Reference D-4527576 - Submission # 715

It should be noted that the following submission is from staff at Hamilton City Council and does not necessarily represent the views of the Council itself.

## Introduction

1. Hamilton City Council staff would like to thank the Ministry of Business, Innovation and Employment for the opportunity to make a submission to its November 2022 Consultation Document **CodeMark: Proposed Transition to New Mark of Conformity**.
2. The feedback from Hamilton City Council staff to a number of the Consultation Document's questions is outlined below.

## CodeMark Mark of Conformity Transition Period

3. The Ministry of Business, Innovation and Employment's November 2022 Consultation Document notes the following in regard to the transition period:
  - *The Building (Building Products and Methods, Modular Components, and Other Matters) Amendment Act 2021 (the Amendment Act) introduced a new certification scheme for modular component manufacturers (BuiltReady) and also made changes to strengthen the existing CodeMark product certification scheme.*
  - *The introduction of BuiltReady along with the revision of the CodeMark scheme, provided an opportunity to review and propose a new brand visual identity for CodeMark. As CodeMark has scheme rules which specify requirements on how the CodeMark brand – the mark of conformity - must be used on certified products, MBIE is proposing a transition period to allow product certification bodies, certificate holders, manufacturers, and suppliers sufficient time to change over to the new CodeMark brand. The purpose of this consultation is to seek feedback from affected parties on whether the proposed transition is a sufficient timeframe to implement the new mark of conformity.*

## Consultation Questions

4. **Question 1-1.** Do you agree that the proposed transition period is sufficient time for scheme participants to implement the new CodeMark mark of conformity requirements for any product produced and packaged after 1 Sept 2024?
5. **Response:** Yes, we are of the opinion that the transition period is sufficient and reasonable to allow the participants to implement the new CodeMark branding. The participants will have an 18-month period from being able to use the new branding (until all their products must display it), which we consider is a reasonable timeframe to sell all stock with the old brand, without requiring too much removal of product for rebranding.
6. **Question 1-2.** Do you consider 1 September 2025 a reasonable deadline for certificate holders to have changed all product packaging over to the new mark of conformity including all existing product at the various points of supply chain?
7. **Response:** Yes, we are of the opinion that this is sufficient and reasonable for the same reasons as outlined to the response to question 1-1 above.
8. **Question 1-3.** If you have any other feedback regarding where the mark of conformity is currently being used, and what the impact of the new mark of conformity is for each of those uses, please add to the free text box below.
9. **Response:** We have no further comment to make.

## Further Information and Opportunity to Discuss Our Submission

10. Should the Ministry of Business, Innovation and Employment require clarification of the submission from Hamilton City Council staff, or additional information, please contact **Alister Arcus** (Principal Building Advisor - Building Control) on 07 838 6881 or email [alister.arcus@hcc.govt.nz](mailto:alister.arcus@hcc.govt.nz) in the first instance.
11. **Hamilton City Council staff would welcome the opportunity to discuss the content of this submission in more detail with the Ministry of Business, Innovation and Employment.**

Yours faithfully



**Lance Vervoort**  
**CHIEF EXECUTIVE**

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