



**Hamilton City Council – Staff Submission**

**Lead and Corrosion Resistance in  
Copper Alloy Plumbing Products -  
Proposed Transition Period End  
Date Extension - Consultation  
Document (April 2024)**

**Ministry of Business, Innovation and  
Employment**



**26 April 2024**



**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 staff submission is aligned to the priority **A green city**.

## Council Approval and Reference

This staff submission was approved by Hamilton City Council's Chief Executive on 26 April 2024.

Submission # 761.

It should be noted that the following submission is from staff at Hamilton City Council and does not therefore 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 the **Lead and Corrosion Resistance in Copper Alloy Plumbing Products - Proposed Transition Period End Date Extension - Consultation Document (April 2024)**.
2. The response/feedback from Hamilton City Council staff is outlined in the Ministry of Business, Innovation and Employment's official submission form - copy attached.

## Further Information and Opportunity to Discuss Our Submission

3. 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 Unit) on **07 838 6881** or email [alister.arcus@hcc.govt.nz](mailto:alister.arcus@hcc.govt.nz) in the first instance.
4. Hamilton City Council representatives 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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# Consultation submission form

## LEAD AND CORROSION RESISTANCE IN COPPER ALLOY PLUMBING PRODUCTS

Proposed transition period end date extension



# How to submit this form

This form is used to provide feedback on proposals found within the lead and corrosion resistance in copper alloy plumbing products - Proposed transition period end date extension consultation document.

When completing this submission form, please provide comments and reasons explaining your choices. Your feedback provides valuable information and informs decisions about the proposals.

You can submit this form by 5pm, Tuesday, 23 April 2024 by:

- Email to: [buildingfeedback@mbie.govt.nz](mailto:buildingfeedback@mbie.govt.nz), with subject line '**Building Code transition period extension consultation 2024**'
- Post to:  
**Building Code transition period extension consultation 2024**  
Building System Performance  
Ministry of Business, Innovation and Employment  
PO Box 1473  
Wellington 6140

Your feedback will contribute to further development of the Building Code. It will also become official information, which means it may be requested under the Official Information Act 1982 (OIA).

The OIA specifies that information is to be made available upon request unless there are sufficient grounds for withholding it. If we receive a request, we cannot guarantee that feedback you provide us will not be made public. Any decision to withhold information requested under the OIA is reviewable by the Ombudsman.

# Submitter information

MBIE would appreciate if you would provide some information about yourself. If you choose to provide information in the "About you" section below it will be used to help MBIE understand the impact of our proposals on different occupational groups. Any information you provide will be stored securely.

## A. About you

Name: Alister Arcus

Email address:

## B. Are you happy for MBIE to contact you if we have questions about your submission?

☒ Yes

☐ No

## C. Are you making this submission on behalf of a business or organisation?

☐ Yes

☐ No

If yes, please tell us the title of your company/organisation:

Hamilton City Council

## D. The best way to describe your role is:

☐ Architect

☒ BCA/Building Consent Officer

☐ Builder or tradesperson (please specify below)

☐ Building product manufacturer or supplier  
(please specify the type of product below)

☐ Designer (please specify below)

☐ Engineer (please specify below)

☐ Residential building owner

☐ Commercial building owner

☐ Other (please specify below)

☐ Prefer not to say

Please specify here:



#### E. Privacy information

- ☐ The Privacy Act 2020 applies to submissions. Please check the box if you do not wish your name or other personal information to be included in any information about submissions that MBIE may publish.
- ☐ MBIE may upload submissions, or a summary of submissions, received to MBIE's website at [www.mbie.govt.nz](http://www.mbie.govt.nz). If you do not want your submission or a summary of your submission to be placed on our website, please check the box and type an explanation below:

*I do not want my submission placed on MBIE's website because... [insert reasoning here]*

#### F. Confidential information

- ☐ I would like my submission (or identifiable parts of my submission) to be kept confidential and have stated my reasons and ground under section 9 of the Official Information Act that I believe apply, for consideration by MBIE.

If you have checked this box, please tell us what parts of your submission are to be kept confidential.



# Lead and corrosion resistance in copper alloy plumbing products

On 2 November 2023, MBIE introduced a new limit to the maximum allowable content of lead permitted in copper alloy plumbing products used for drinking water supplies, and a new requirement for copper alloy water supply system components to be dezincification resistant.

A transition period is currently in place, with the change in allowable lead content set to come into force on 1 September 2025, and the change regarding dezincification resistance on 1 November 2024.

When these changes were consulted on and announced in 2022, the lead in plumbing products transition period end date of 1 September 2025 was in alignment with the introduction of equivalent plumbing product changes in Australia. However, Australia has since extended their transition period end date by eight months, to 1 May 2026.

We are now proposing to extend the transition period end date for the new lead in plumbing product provision in New Zealand, to 1 May 2026. This is an extension of eight months and aligns with the transition period end date in Australia.

We are also proposing to define the term *lead free* to improve clarity for the identification of products that meet the requirements of the new lead in plumbing product provision, and make editorial changes.

Additionally, we are proposing to extend the transition period end date for the new dezincification resistant copper alloy provision to 1 May 2026. This will align with the transition period end date for the lead in plumbing product provision. This proposed change will provide clear, consistent and aligned timeframes for those that need to adapt the types of copper alloys used to manufacture plumbing products.

Aligning the lead in plumbing product transition period end date in New Zealand with that in Australia will provide plumbing product manufacturers and suppliers additional time to make the necessary changes.

## Questions for the consultation

1. Do you support amending Acceptable Solution G12/AS1 to re-align the transition period end date for the new **lead in plumbing product provision** to come into effect in New Zealand with the date when equivalent requirements will come into effect in Australia?

This would extend the transition period for the new lead in plumbing product provision by eight months, to 1 May 2026.

☐ Yes, I support it

☒ No, I don't support it

☐ Not sure/no preference

**Is there anything you would like to tell us about the reason(s) for your choice?**

This has been widely advertised and plumbers, suppliers and merchants within the plumbing industry are well aware of the changes and the timelines attached to them and should have prepared for this.

New Zealand does not align with Australia in multiple other areas within the construction industry and we must continue on our own pathway and ensure that we are complying with the principles and purposes of the Building Act 2004.

We have a duty of care to ensure that these purposes and principles are upheld, and by delaying the date we are at risk of breaching S3a.1, S3a.2, S4.2b.

2. Do you support amending Acceptable Solution G12/AS1 to align the transition period end date for the new **dezincification resistant copper alloy provision** with the transition period end date for the lead in plumbing product provision?

This would extend the transition period for the new dezincification resistant copper alloy provision to 1 May 2026.

☐ Yes, I support it                      ☒ No, I don't support it                      ☐ Not sure/no preference

**Is there anything you would like to tell us about the reason(s) for your choice?**

As per question 1 above, this has been widely advertised and plumbers, suppliers and merchants within the plumbing industry are well aware of the changes and the timelines attached to them and should have prepared for this.

New Zealand does not align with Australia in multiple other areas within the construction industry and we must continue on our own pathway and ensure that we are complying with the principles and purposes of the Building Act 2004.

We have a duty of care to ensure that these purposes and principles are upheld, and by delaying the date we are at risk of breaching S3a.1, S3a.2, S4.2b.

3. Do you support amending Acceptable Solution G12/AS1 to provide a **definition for lead free**, similar to equivalent definitions used in Australia and the USA?

☒ Yes, I support it                      ☐ No, I don't support it                      ☐ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

It will ensure clarity and consistence in approach New Zealand-wide with a definition.

4. Do you support amending Acceptable Solutions G12/AS1 and G12/AS3 to address the editorial changes as proposed?

☒ Yes, I support it                      ☐ No, I don't support it                      ☐ Not sure/no preference

Is there anything you would like to tell us about the reason(s) for your choice?

**5. What impacts would you expect for your business from the proposed changes?**

These impacts may be economic/financial, environmental, health and wellbeing-related, or other areas.

None if these proposals are adopted. It will be 'business as usual'.

# Thank you

Thanks for your feedback, we really appreciate your insight. It helps us keep pace with modern construction methods, the needs of New Zealanders and ensures people are safe and healthy, living in durable homes and buildings.

To help us continue to improve the Building Code, we would appreciate any suggestions or comments you may have on what is working and how we can do better.

Please leave your feedback here:

