

18 October 2018

Ministry of Business, Innovation and Employment
PO Box 1473
Wellington 6140

By email: Healthyhomes@mbie.govt.nz

Healthy Homes Standards

Dear Sir/Madam

The New Zealand Medical Association (NZMA) wishes to provide feedback on the above consultation. The NZMA is New Zealand's largest medical organisation, with more than 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders. Our submission has been informed by feedback from our Advisory Councils and Board.

Background and general comments

1. We congratulate the Government for progressing this important work. The NZMA strongly supported the Healthy Homes Guarantee Bill which enabled the Government to set health-related requirements for rental homes.¹ Housing is a key social determinant of health and an important mediating factor in health inequalities and poverty. Cold and damp housing is a contributor to asthma and other respiratory conditions.² World-leading research undertaken in New Zealand has found that improved health outcomes can be achieved through housing interventions such as retrofitting insulation and providing improved heat sources.³ These

¹ NZMA. Submission on Healthy Homes Guarantee Bill. 21 June 2016. Available from http://www.nzma.org.nz/_data/assets/pdf_file/0015/50127/NZMA-Submission-on-Healthy-Homes-Guarantee-Bill-No-2.pdf

² Asher I, et al. Asthma and Respiratory Foundation NZ child and adolescent asthma guidelines: a quick reference guide. NZMJ 1 December 2017, Vol 130 No 1466. Available from <https://www.nzma.org.nz/journal/read-the-journal/all-issues/2010-2019/2017/vol-130-no-1466-1-december-2017/7425>; Asthma and Respiratory Foundation of New Zealand 2015. Te Hā Ora (The Breath of Life): National Respiratory Strategy. Wellington: November 2015, Available from <https://www.asthmafoundation.org.nz/about-us/advocacy/national-respiratory-strategy>

³ Thomson H, et al. The health impacts of housing improvement: A systematic review of intervention studies from 1887 to 2007. American Journal of Public Health. 2009;99(S3):S681-92; Howden-Chapman P, et al. Effect of insulating existing houses on health inequality: Cluster randomised study in the community. British

interventions have been found to be cost-effective. An economic evaluation of the Warm Up New Zealand (WUNZ) Programme (which subsidised retrofitting insulation and heating to homes built pre-2000) had a benefit-cost ratio of 3.9.⁴

2. The NZMA strongly supports the development of standards for rental homes covering minimum levels for heating, insulation, ventilation, draught-stopping, drainage and moisture-ingress. Our submission takes a principles-based approach to these standards, drawing on specific evidence where it is available. As we are not technical experts, when it comes to identifying preferred options across each of these standards, we recommend that MBIE listens to organisations with appropriate expertise such as He Kainga Oranga, the Housing and Health Research Programme at the University of Otago, Wellington. We are disappointed that MBIE did not progress our previous suggestion to develop a standard relating to the overall thermal efficiency of a dwelling and ask that consideration be given to developing this.

3. We recognise the importance of setting rental housing standards that are clear and enforceable. We believe that these standards need to be set at a level that addresses the relevant health concerns without becoming excessively bogged down in exacting minutiae for little health gain, and while being mindful of compliance costs that may be passed on to tenants. We recommend that robust mechanisms be established to comprehensively evaluate the standards that are introduced. These should include monitoring of objectives, compliance, as well as costs, including those that may be passed on to tenants.

4. We have previously conveyed our view that those providing rental housing need to ensure the health and safety of their occupants, just as all other businesses must ensure the same for their consumers and employees. If there is evidence showing that landlords will transfer the costs of meeting these standards to tenants, we suggest the Government consider options to mitigate this. These could include the form of subsidies or other financial incentives (eg, making the costs tax deductible). There is a precedent for this with the provision of insulation subsidies in the past for landlords who had tenants with a community services card and other needs.

5. We note the important alignment between health and environmental goals that this work will contribute to. For example, improved insulation of housing and more efficient heating will have benefits for health while helping to reduce carbon emissions. Along with the health benefits, we believe that the environmental co-benefits of this work should be factored into future cost-benefit analyses.

Specific comments on the standards

Heating

6. Heating standards should be set at a level that ensures the living areas of a home are acceptably warm in winter. The World Health Organization (WHO) recommends that interior house temperatures should be maintained above 18 degrees, while a higher temperature (20 degrees) is recommended for certain groups such as very young children and elderly persons.⁵ As

Medical Journal. 2007;334(7591):460-4; Howden-Chapman P, et al. Effects of improved home heating on asthma in community dwelling children: randomised controlled trial. BMJ. 2008;337; Jackson G, et al. Reduced acute hospitalisation with the healthy housing programme. Journal of Epidemiology and Community Health. 2011;65(7):588-93

⁴ Grimes A, et al. Cost benefit analysis of the Warm Up New Zealand: Heat Smart Programme. Wellington: Motu, Covec, He Kainga Oranga/Housing and Health Research Programme, University of Otago, Department of Mathematics, and Victoria University for the Ministry of the Environment;2012. Available from: http://www.healthyhousing.org.nz/wpcontent/uploads/2012/05/NZIF_CBA_report-Final-Revised-0612.pdf

⁵ Ormandy D, Health and thermal comfort: From WHO guidance to housing strategies. Energy Policy. 2012;49:116-21

we have previously pointed out, any measures to secure warmer interior house temperatures need to take into consideration a combination of household income, energy costs and the energy efficiency of the house. The cost of heating poor-quality housing falls unequally on low-income households, contributing to the key issue of fuel poverty.

7. We agree with the proposal, as part of the heating standard, to create a class of acceptable heating devices that are efficient, healthy and affordable. We suggest that heaters with exposed bars should be added to the list of heating devices that have been identified as not acceptable, given their potential to burn or electrocute.

Insulation

8. Insulation is vitally important to help retain heat to keep a home warm, and a key component of the overall thermal efficiency of a dwelling. We welcome proposed standards that attempt to improve on the status quo while balancing costs of compliance. A recent New Zealand study reported that retrospective insulation and heating under the WUNZ programme reduced total hospitalisation rates for all children by 6%.⁶ Hospitalisation rates for children in low-income households were reduced by 12%. Tellingly, hospitalisation rates for children in rental housing were reduced by 19%.

9. For homes where there is an absence of double glazing in bedrooms, we suggest consideration of an additional requirement for thermal drapes or heavy window coverings.

Ventilation

10. Ventilation

Poor ventilation leads to dampness and mould which, in turn, contributes to poor health outcomes. A recent New Zealand study found a strong association between mould and childhood wheeze.⁷ We welcome proposed ventilation standards that improve on the status quo.

Moisture ingress and drainage

11. Moisture entering a home from outside often contributes to damp and mould issues inside the home and, consequently, to poorer health. We welcome proposed standards relating to moisture ingress and drainage that improve on the status quo.

Draught stopping

12. Draughts increase the risk of a cold indoor temperature and make it harder and more expensive to heat homes. New Zealand research has demonstrated that even minor improvements in draught stopping can improve the warmth of homes.⁸ We support the proposed standard to stop unnecessary gaps or holes that cause noticeable draughts, which we believe is an improvement over the status quo.

⁶ O'Sullivan K, et al. Child and youth fuel poverty: assessing the known and unknown. *People, Place and Policy*; 2016:1/1, 77-97. Available from <http://extra.shu.ac.uk/ppp-online/child-and-youth-fuel-poverty-assessing-the-known-and-unknown/>

⁷ Shorter C, et L. Indoor visible mold and mold odor are associated with new-onset childhood wheeze in a dose-dependent manner. *Indoor Air*. 2018 Jan;28(1):6-15

⁸ Rangiwhetu L, et al. Effects of minor household interventions to block draughts on social housing temperatures: a before and after study. *Kotuitui: NZ J Soc Sci*. Sep 2017; 12:2, 235-245: Available from <https://www.tandfonline.com/doi/full/10.1080/1177083X.2017.1372787>

Timeframes, implementation and compliance

13. We note that several options are presented for the timing to implement the standards. These options take into account the need for landlords, industry and government to understand their obligations, build capacity and comply with the standards. We believe that there needs to be a specific and enforceable timetable to implement the standards. We support a phased approach to implementation over a period of no longer than five years.

14. We note that MBIE is proposing that compliance with these standards can be pro-actively encouraged through education and incentives, but that compliance can also be reactively enforced. We have previously expressed our concerns with standards that rely on the continuation of a self-regulatory system where the onus is on landlords to assess their property and undertake any actions to meet the minimum proposed standards. There are strong disincentives to tenants reporting problems with their rental housing. We continue to call for a more reliable method of enforcement of housing standards, such as a warrant-of-fitness model as suggested in an MBIE-commissioned cost-benefit report on housing standards.⁹ Under such a regime, it has been estimated that 80-90% of landlords would comply, ensuring that far more tenants would benefit from improved housing. There is already considerable New Zealand research and experience with a warrant-of-fitness in housing that could be drawn on.¹⁰

We hope our feedback is helpful and look forward to the learning the outcome of this consultation.

Yours sincerely



Dr Kate Baddock
NZMA Chair

⁹ Blick G & Davies P. Cost benefit analysis for a minimum standard for rental housing, Prepared for the Ministry of Business, Innovation and Employment. 2014, Sapere Research Group Available from <http://www.mbie.govt.nz/publications-research/publications/housing-and-property/cost-benefit-analysis-minimum-standard-rental-housing-report-prepared-for-mbie.pdf>

¹⁰ Bennett J, et al. Results from a Rental Housing Warrant of Fitness Pre-Test. 2014, He Kainga Oranga/Housing and Health Research Programme, Department of Public Health, University of Otago, Wellington: Wellington. Available from <http://sustainablecities.org.nz/wp-content/uploads/Results-from-a-Rental-Housing-WOF-PreTest-May-2014.pdf>; Bennett J, et al. Towards an agreed quality standard for rental housing: field testing of a New Zealand housing WOF tool. Aust N Z J Public Health, 2016.10.1111/1753-6405.12519; Bosch M. Trial of Rental Housing Warrant of Fitness Scheme with Housing New Zealand 2014, Housing New Zealand Corporation; Smith N, Trial of Rental Housing Warrant of Fitness Options with Housing New Zealand Corporation (Cabinet Paper). 2013, Office of the Minister of Housing: Wellington. Available from <http://www.mbie.govt.nz/what-we-do/housing/pdf-document-library/cabinet-paper-trial-rental-housing-wof-options-housing-nz-nov2013.pdf>