



1222 Moonshine Rd,  
RD1, Porirua 5381  
Private Bag 50 908  
Porirua 5240  
New Zealand  
P: +64 4 237 1170  
[branz.co.nz](https://www.branz.co.nz)

23 June 2025

**SUBMISSION TO:** Ministry of Business, Innovation and Employment (MBIE)

**SUBMISSION ON:** Consultation – Building Product Specifications

**SUBMITTER CONTACT INFORMATION:**

Dr Chris Litten  
General Manager, Research  
BRANZ  
Private Bag 50 908,  
Porirua 5240  
Email: [redacted]

The Building Research Association of New Zealand<sup>1</sup> (BRANZ) welcomes the opportunity to work with MBIE to provide technical feedback on the draft first edition of the Building Product Specifications (BPS).

BRANZ's primary role is as an independent science and research organisation, established by the Building Research Levy Act 1969. BRANZ is the only national research institution focused exclusively on building and construction. Alongside research, BRANZ offers commercial, independent, science-based testing and assurance services. BRANZ has over 50 years of expertise in assessing both domestic and international products entering the market.

As such, BRANZ is well placed to provide technical feedback on the BPS. To do this, each new Standard will need to be carefully considered for use in the New Zealand context. To resource this work effectively will require significant time and a reprioritisation of our in train research and testing assurance work.

This point was noted as a risk in our submission on *Building Act changes removing barriers to using overseas building products*, dated 5 July 2024<sup>2</sup>. In that submission, working with BRANZ was framed as a suggestion to mitigate the implementation risk:

6. *Utilise BRANZ's significant technical expertise and capability. We welcome further discussion with MBIE on ways we can assist, as we are concerned about the estimation of capacity, effort, cost and level of expertise required to undertake and maintain these Building Act changes.*

---

<sup>1</sup> <https://www.branz.co.nz/>

<sup>2</sup> BRANZ submission dated 5 July 2024 on Building Act changes removing barriers to using overseas building products can be accessed here <https://www.branz.co.nz/sector-leadership/building-act-changes-removing-barriers-to-using-overseas-products/>

*Specifically, the building product specification instrument will require investment and effort as the industry (including BCAs) will be relying on it. It will need constant, consistent, rigorous updating, with an upfront investment and commitment to ongoing maintenance and supporting capability.*

As well as the technical resource and time involved, there is the issue about accessing the overseas Standards. BRANZ has access to some of the Standards referenced in the draft first version of the BPS, but accessing those we do not currently have will require an outlay of over \$10,000.

We have not been able to undertake detailed consideration of the draft BPS in the three weeks provided to meet the 23 June 2025 deadline for feedback. We continue to welcome the opportunity to discuss with MBIE ways we can more thoroughly consider the draft BPS and review to the appropriate level, commensurate with our technical knowledge and capability of the BPS content.

Yours sincerely

A handwritten signature in blue ink, consisting of a stylized 'C' and 'L' with a horizontal line across the middle.

Dr Chris Litten  
General Manager, Research