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SUBMISSION ON PROPOSED CANTERBURY AIR PLAN

In support of the submission from NZHHA Schedule 7, Part 1: Installation, registration and maintenance of domestic solid fuel burners pCARP 1364

The NZ Home Heating Association was formed in 1985, by a group of wood heating manufacturers and retailers who saw a need to improve the standards of product and workmanship within the industry.

Since then the Association has played an active role in the development of appliance and installation standards both nationally and internationally and has become the industry's mouthpiece. It also plays a major role in the development and promotion of clean air standards, and energy and resource conservation. It runs a certification for installer and retailer members to help ensure that the appropriate standards are maintained at all levels within the industry. The Association is affiliated with similar trade groups and organisations throughout the world.

The New Zealand Home Heating Association is a trade organisation, comprising of most of NZ's leading manufacturers, retailers and installers of domestic wood burning appliances. The Association is dedicated to providing professional services and advice to its members and their customers.

Membership - NZHHA membership currently includes 12 Manufacturers, 61 Retailers and 234 Registered Installers. It works in partnership with BRANZ, Ministry for Environment, Building Officials Institute of NZ, Australian Home Heating Association Incorporation, Standards NZ, Standards Australia and Environment Canterbury.

Relationships - NZHHA works closely with Environment Canterbury on all aspects of Solid Fuel Heating, from the authorisation to the installation, supporting in full, the Good Wood Program and ensuring information, advice and training is available to house holders and consumers about how to run their

wood burner correctly and efficiently, so they burn clean. We support all initiatives on clean burning of wood burners.

Training - The Association has invested in the development and design of a comprehensive competency based training course on Solid Fuel Heating for installers and retailers. Members progress through the training to meet certification standards. This includes all aspects of installation.

- An introduction to Solid Fuel Heating concluding with an exam;
- Submission of a logbook;
- Regularly audits;
- Pre-course reading and questionnaire;
- Intensive training in Solid Fuel Appliance Installation Technicians and an exam; and
- Refresher courses every 2 years to keep up with advances in technology.

Our training courses are very widely accepted in the building Industry and we provide training for most of the Territory Authorities throughout New Zealand.

Of note, to ensure a fire burns clean, our training includes

- Correct placement of the appliance;
- Flue heights;
- Wind directions; and
- Checking the inversion layer and the consequences.

This furthers the work undertaken by Manufacturers who invest significantly in research and development of product to make a clean burning appliance.

NZ Manufactures distribute the cleanest burning wood fires in the world today. If they are not fitted by appropriately trained and qualified installers, then all the research and testing undertaken by Manufacturers to combine efficiency and environmental responsibility is wasted.

Other organisations provide minimal training, some as little as 2 pages of documentation, and often a halfhearted, and misguided attempt to cover the basics. NZHHA training is focused solely and intensely on Solid Fuel heating. We have recognized, and addressed a significant and alarming gap in expertise in the trade sector. Installers are comprehensively trained in a targeted manner, specific to only Solid Fuel Heating, to ensure an installation that provides consumers with a safe, warm and healthy home environment.

Standards AS/NZ – In 2001 the NZHHA were responsible for writing the AS/NZS2918, AS/NZS4012, and AS/NZS4013 Standards; and currently have two Members of its Executive on the CS062 Committee which are writing the new standards for AS/NZS2918, AS/NZS4012-2014 and AS/NZS4013-2014.

Other Submissions have acknowledged AS/NZS2918 which is a safety standard on the installation of wood burners. Of importance, AS/NZS4012 and 4013 are the standards that are applicable to Emissions.

- 4012 for the method for determination of power output and efficiency; and

- 4013 for the method for determination of flue gas emissions

It is particularly concerning that no other organisation includes these standards as compulsory in their training, and most have not acknowledged these in their submissions. These important Standards are covered in depth in the NZHHA training.

Fair Trading – We are concerned other organisations are trying to marginalize NZHHA in terms of discrediting the level of ability and training required for installation. The reality is poor training, no training or naivety is a recipe for explosions and fire in the home, and potential human tragedy.

Currently, a certified gas fitter is the only person who can install a gas appliance because they are solely trained for that purpose. In applying the logic noted above, if Solid Fuel Heating Appliance Technicians were working against the Fair Trading Act so is any other trade qualified person.

Costs - Being a NZHHA member and a Registered Solid Fuel Appliance Installation Technician would not and should not increase costs to the Consumer in any substantial way. Our training is conducted by NZHHA, a not for profit organisation that doesn't overcharge our members. Our trained and certified technicians are more knowledgeable, and somewhat faster in their work. Overall costs to install a wood fire by our trained installers are less than a burner installed by a plumber or builder with no comprehensive industry training and expertise.

Some submissions have noted their technicians would be required to attend NZHHA training, incurring additional costs. NZHHA training costs are minimal in comparison to other organisations. Given the significant expertise attendees are gaining and the professionalism certification brings to the industry, and the health and safety benefits to consumers, costs are insignificant. It is a small price to pay for clean air, and safe and compliant installations.

No preferred installers - Under no circumstances has NZHHA established, or are we expecting to operate a preferential installer system. It is our view our training covers all aspects of installation and helps support our Manufacturers to help clean up air quality. The facts show over the years that NZHHA and its Installers, Retailers' and Manufacturers have done just that and it is our intention to continue in this regard. Our membership and training is available to anyone who shares our goal to promote public health and safety, and air quality through correct and compliant installations.

Under the Building Code a solid fuel heating appliance must be installed to the Manufacturers specifications. 90% of our Manufacturers' state either: "must be, should be, or ideally be installed by an approved Installer registered with the NZHHA."

So in affect if we are to follow the Manufacturer's Instructions, as is required under the Building Code, all solid fuel heating appliances should be installed by a Solid Fuel Heating Appliance Technician registered to the NZHHA.

Summary - Any person or any tradesperson can join the NZHHA and undertake the necessary and appropriate training. The NZHHA has had an 22% increase in membership over the past 2 years which is

now showing that our training is extensive and valuable to the industry and the consumer. A number of plumbers and builders are becoming members and have undertaken the training. They recognise the value and risk mitigation that NZHHA brings to installer compliance.

Submission – The Association continues its submission that the Canterbury Air Regional Plan implements as intended *Part 1 – Installation – that Domestic Solid Fuel Burners installed after 28 February 2015 are to be installed, or their installation approved, by a person or company accredited as a Solid Fuel Appliance Installation technician by the New Zealand home Heating Association.*

The NZHHA considers this position provides a safe, warm and healthy environment for consumers, and protects the environment by lifting clean air standards, including controlling the discharge of contaminants into the air, demonstrating energy and resource conservation.

The Association proposes a small grace period which would allow for plumbers, or other industry colleagues who currently undertake installations, to transition through our training and certification standards over the next year.

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If you would like more information about this topic, please contact the Secretary at 04 473 6011 or email Info@homeheat.co.nz.

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