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**Ministry of Business, Innovation and Employment**

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Tēnā koe,

Thank you for the opportunity to respond to the consultation on the 5<sup>th</sup> edition of the Government Procurement Rules.

We represent a strong community of 700 businesses, organisations, and supporters who believe in a better, more sustainable built environment for Aotearoa.

It is our submission that, for many reasons, the proposed changes are a backward step, and fail to deliver value for taxpayers, or growth for New Zealand.

It is a shame to see the proposal to remove requirements for trusted, independent sustainability and energy efficiency benchmarking when building new buildings or leasing building space.

The existing requirements around efficient, sustainable buildings deliver not only better value for government, but also help deliver on the Government's climate, energy, health and social commitments.

We submit that:

- The proposal contradicts the requirements for public value and wise use of taxpayer funds laid out in the proposed rules
- There doesn't appear to have been any cost/benefit analysis, evidence gathered, or stakeholder engagement in the lead up to this decision, violating the Coalition agreement requirement that 'decisions will be based on data and evidence'.
- These changes send a strong signal that this government doesn't believe it needs to lead or walk the talk, and goes against the global current of responsible government procurement
- Better buildings support lower government running costs, reduce peak load, pressure on the energy grid, and contribute to wider health, productivity, and government debt initiatives.
- Keeping NABERSNZ and Green Star ratings for larger buildings aligns with New Zealand's global commitment to double energy efficiency every year to 2030 and aligns with the second Emissions Reduction Plan's expansion of NABERSNZ

- Government and the construction sector are investing significant resources in decarbonising building materials. The most significant way to ensure the materials providers decarbonise is to enable demand for lower carbon materials. As a large procurer of products in New Zealand it assists greatly for the government to continue to certify larger building projects to Green Star.

This government says it is dedicated to the environment. As the largest procurer in New Zealand building to green certified standards and leasing energy efficient offices is a way to illustrate your commitment to environmental stewardship.

The following organisations support the call for keeping NABERSNZ and Green Star certification for use in government procurement of larger new buildings and leases:

- BraveGen
- Climate Energy Professionals NZ
- Daikin New Zealand
- The Facilities Management Association of New Zealand
- Hawkins
- LT McGuiness
- Metals New Zealand
- McKee FehI
- NZ Construction Industry Council
- NZ Institute of Quantity Surveyors
- NZ Institute of Architects
- World Wildlife Fund

We would welcome the opportunity to meet further and to discuss strategies to reduce costs through procurement. There are a number of avenues that Government Property Group can take to significantly reduce costs on green buildings and deliver greater value for New Zealanders.

Ngā mihi nui,

Andrew Eagles

NZGBC Chief Executive