

5 July 2013



Hon Maurice Williamson  
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Dear Minister

I noted from your interview yesterday afternoon with Mary Wilson, that there was a reference to “illegal building consents”.

IANZ has never stated that consents issued were illegal. The allegations of illegality are a misinterpretation of the findings in our reports.

In September 2012, during our assessment of Christchurch City Council Building Consent Authority (CCC BCA), IANZ identified a number of consents where full compliance with the requirements of the Building Code or Act had not been demonstrated. This does not necessarily mean that consents were issued that were invalid – there could have been a lack of evidence to support the decisions made, the consent may not have been issued within 20 working days as required by the Act, or it may have been unclear what work the consent was issued for.

Our report of 1 July 2013 referred to this finding: “The IANZ review at that time identified building consents that did not meet the requirements of the Building Code and/or Act.”

Mary Wilson has rephrased this sentence as “Consents did not comply with the law”. As stated above, this is a misinterpretation of our findings in that it implies that serious failure will result.

While granted consents may not be technically compliant with the requirements of the Building Code and /or Act, this should never be interpreted as “Consents are not legal”.

I hope this clarifies the situation.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Dr Llew Richards', with a stylized flourish at the end.

**Dr Llew Richards**  
CEO