



The Office of Gas and Electricity Markets  
9 Millbank  
London  
SW1P 3GE

24<sup>th</sup> September 2013

Dear Will Broad,

**Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard- to- treat cavities**

We write on behalf of the National Blown Bead Association which represents some 80% of the installers and system holders of expanded polystyrene bead insulation blown into masonry cavity walls. The NBBA is a part of the British Plastics Federation

Members of the NBBA are free to make their own submissions and we are aware that detailed points will have been made in separate submissions and so confine these comments to broader matters

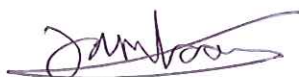
- 1) The industry welcomes the thrust of the ECO scheme to encourage the insulation of hard to treat cavities to improve the insulation of walls which otherwise would fall outside the scope traditional cavity insulation i.e. cavities greater than 50mm.
- 2) We recognize that the hard to treat sector will require high standards of workmanship and careful monitoring in the early stages to ensure customer satisfaction and confidence in the systems used. NBBA members are confident that they can demonstrate their ability to fulfill these requirements.
- 3) The proposed introduction of these new measure on 1 October 2013 is only a few days after the close of the consultation period and this is seen as precipitous if as a result of this consultation changes were to be made to the proposed rules.
- 4) You state that a large number of HTTC measures have been notified to Ofgem and that a large proportion fall outside the definition of HTTC; you are making further checks on the validity of the paperwork. As a result of these concerns the measures are proposed to cover 100% verification of narrow HTTC measures. Whilst understandable this requirement must be relaxed at an early opportunity for companies that demonstrate their ability to conduct their surveys accurately. If an independent assessor must be used the additional costs will act as a deterrent to industry and to the consumer.
- 5) We are also concerned that completion of a Narrow HTTC Declaration Form by an independent assessor will add significantly to the costs of the process.

- 6) There are logistical concerns over using chartered surveyors and other independent persons to check the extra 5% of installations during the "mid" installation phase. Not only does this have to be timed correctly but the costs again come into play. It would be unfortunate and counterproductive if the inspection and administration costs were to increase disproportionately to the value of the cavity insulation.

In summary we are concerned that proposals will be enacted in a very short timescale with little likelihood of changes until the unforeseen consequences become apparent. The whole inspection system must recognize those companies that perform well and encourage the less well performing to raise their game to the highest standards.

The NBBA members would welcome the opportunity to discuss their concerns further and be of assistance in the future to encourage the development of insulation for hard to treat cavities.

Yours sincerely,



Jonathan Bloom  
Senior Executive Industrial Issues