

FAO Will Broad

Dear Will

I am writing in response to the Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard-to-treat cavities. Please see below response from Sustain to each question in the consultation:

1. 100% verification of narrow HTTC measures; Sustain are broadly in favour of a verification process to ensure the accuracy of notifications of HTTC measures. However, we would like to seek clarity on the requirement of independence of the Chartered Surveyor, as a delivery partner to Suppliers Sustain would wish to appoint an independent surveyor but your definition suggests that we would not be able to do this as we are not the Supplier, please could you clarify what kind of association to the chartered surveyor is permitted? We would also like clarification for works to whole blocks of flats, we would suggest that one drill hole per elevation of the block would be sufficient for the chartered surveyor to confirm the cavities of the block are narrow rather than drilling a hole in each external wall of each flat. Similarly we would suggest that a representative sample of properties could be drilled to confirm that all the properties in an estate of houses that were built at the same time of the same construction have narrow cavities. Lastly, we are concerned about the extra costs involved in the proposed process and the associated time lag that will occur as a result of the additional requirements proposed.
2. Increased requirements on HTTC measures that require a chartered surveyor's report. As above we would like to seek clarity on whom is independent from the supply chain. Again we would highlight the additional cost and time involved to meet this requirement. However, we are in favour of the proposal.
3. Increased technical monitoring. We are in favour of an increase for the reasons set out by Ofgem however would like to note that organising mid installation technical monitoring of cavity wall insulation is difficult because the works can be completed very quickly and therefore careful management of this will be required. Again, extra costs will be involved in an increase in technical monitoring inspections.

Best wishes

Henrietta Bird
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