

Please find our comments below in red. We've concentrated our comments on the Building Regulations questions, as discussed at the workshop.

Comments:

3. Compliance with Building Regulations: Installation of a measure

3a) Do you agree with our proposal to require evidence that the installation of a measure complies with Building Regulations? Please give reasons for your answer.

Yes, as this is a legal requirement anyway, but may not be being done in all cases. Asking for evidence will improve compliance and thereby reduce the risk of non-compliant work on properties for consumers and the energy suppliers.

3b) If this requirement was introduced, how could compliance be demonstrated?

You have listed the current ways of demonstrating compliance. For eligible measures, most installers will want to use the Competent Person Scheme (CPS) approach. For CPS, the installer will have a certificate of registration with an authorised scheme and be listed as a registered company on the relevant website allowing them to self-certify. Therefore, it is sufficient to check that their registration is current, rather than needing to check each installation record, although an installer should confirm that they have notified that work through their scheme. It would be worth listing, or referencing, the measures that require Building Regulations notification and the relevant CPS schemes available (see Schedule 3 of the Building Regulations for England. Wales also allows CPS, but they are not used in Scotland). For Local Authority Building Control, installers would need to show they had notified the work direct to the relevant LA.

3c) Are you aware of any other means of evidencing compliance with building regulations other than those listed (for either the installation or the product and system, or both)? If so, please provide details.

No, but as mentioned at the workshop, it would be best to keep in the existing requirements for products and systems as well as the new installation requirements so that product/system and installation are covered where required, particularly for measures like cavity wall and solid wall insulation. The Building Regulations require cavity wall insulation to be carried out by an installer approved to use specific approved systems, so both aspects need to be covered adequately.

3d) Do you think we should introduce this requirement from the date version 1.2 of the guidance takes effect or for the next ECO obligation period (2015-2017)? Please give reasons for your answer.

Introduce for version 1.2, as installers should already be notifying relevant work. Also, Building Regulations compliance was included in previous Technical Monitoring questions but dropped from the latest versions, i.e. Version V1 May 2013, question 24 for CWI (a different number for other measures) specifically asked 'is there evidence that the installation and materials comply with building regulations?'. This question was removed in the version V2.1 March 2014.