

Please see below ECO Consultation 1.2 response:

**1a) Do you agree that insulation of a cavity wall must be installed to at least 50% of the total exterior facing wall area of the premises in order to support a secondary measure?**

Yes

**1b) Please give reasons for your answer (including any alternative suggestions for an acceptable minimum threshold).**

Without a minimum installation level the calculated energy savings will not be achieved, as is within the draft the secondary measures should also have a minimum threshold.

**1c) Do you agree that roof-space insulation must be installed to at least 50% of the total roof-space area of the premises in order to support a secondary measure?**

Yes – installation should be in accordance with industry standards with not only coverage but product and depth stipulated

**1d) Please give reasons for your answer (including any alternative suggestions for an acceptable minimum threshold).**

To gain appropriate efficiency from the installation an accepted industry standard should be available taking into consideration not only a minimum threshold but also Ventilation in accordance with Approved Document F, F2 (Condensation in Roofs) of the Building Regulations or Technical Standard K (Ventilation of Buildings, Regulation 23) of the Building Standards (Scotland)

**2a) Do you agree with the reasons we are proposing for judging why any of the roof-space or exterior-facing wall area cannot be insulated?**

Yes

**2b) Are there any other scenarios where the exterior-facing wall area of a premises being connected to a DHS cannot be insulated?**

Unable to comment

**2c) How can suppliers demonstrate for compliance purposes that the exterior-facing wall area cannot be insulated?**

Pre installation surveys and evidence of construction types should be able to evidence these exceptions and highlight further recommendations/alternatives, if applicable.

**2d) Are there any other scenarios where the roof-space area of a premises being connected to a DHS cannot be insulated?**

Unable to comment

**2e) How can suppliers demonstrate for compliance purposes that the roof-space area cannot be insulated?**

As above pre installation surveys and evidence of construction types should be able to evidence these exceptions and highlight further recommendations/alternatives, if applicable.

**2f) Are there any additional factors that can affect the decision on whether or not to insulate a premises?**

Building Regulations could have an impact on what is appropriate and all requirements should caveat 'where compliant with Building Regulations' specifically ventilation and energy efficiency requirements, Approved Documents F & L.

For premises, not including those within a multi-storey building which is not located on the top floor

**2g) Do you agree that, where the roof-space area or total exterior-facing wall area of the premises are insulated to less than 100% but more than a specified minimum level, a DHS connection should be eligible where the remaining area cannot be insulated?**

Yes

**2h) Do you agree that this minimum level should be set at 50%?  
Setting the level to 50% provides consistency throughout the document**

**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 – all installations are required to be compliant with Building Regulations and there is a framework, in the form of Competent Persons schemes available for the majority of the measures, this should be utilized to an additional layer of robustness to ECO.**

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

Compliance with Building regulations can be demonstrated before engagement of installers in the form of certification with an accredited Competent Person Scheme operator, following a completed installation compliance can be demonstrated through certificates of compliance which are already contained in the majority of PAS2030 compliant handover packs.

**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

**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.**

For the supply chain to implement the requirement in all activities its realistic to look for introduction in the next ECO obligation period (2015-2017)

**4a) Please provide any further comments on the changes to our DRAFT guidance document (version 1.2).**

No comments