NATIONAL INSULATION ASSOCIATION RESPONSE TO ENERGY COMPANIES OBLIGATION (ECO) CONSULTATION ON THE CHANGES TO THE GUIDANCE FOR SUPPLIERS

QUESTION 1.

MINIMUM INSULATION LEVEL TO SUPPORT A SECONDARY MEASURE

Insulation of a Cavity wall & Roof Space Insulation

a) 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?

This is a sensible approach and in line with best practice thought processes.

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

Typically the main reasons that a property's entire wall area is not insulated relate to existing elements such as; solid wall present on an elevation, access related issues and/or other precluding factors.

If 50% is mandated the property will still achieve significant heat loss and/or carbon reduction savings thus enabling an additional (and equally) cost effective secondary measure to be introduced.

c) 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?

This is a sensible approach and in line with best practice thought processes.

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

Typically the main reasons that a property's roof area is not insulated relate to elements such as; access related issues and/or other precluding factors.

If 50% is mandated the property will still achieve significant heat loss and/or carbon reduction savings thus enabling an additional (and equally) cost effective secondary measure to be introduced.

QUESTION 2.

Connections to a district heating system: Pre-conditions for the premises under CERO and CSCO

a) 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?

We believe that this a sensible approach that ensures that the fabric of a building is treated before heat generation measures are added.

A 'Fabric First' approach is necessary to ensure that heat loss is assessed and reduced in as practical and cost effective way as possible.

It should be clarified that cost, including access costs, are not a legitimate reason why a wall area cannot be insulated.

We would also suggest a robust process to determine how refusal of consent from Landlords to treat the building fabric/roof space could be evidenced. This includes the broad scope on which it is suggested that this might be legitimately withheld.

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

Other reasons might include;

- *Unsuitable building construction type - for which there are no products currently approved and/or no Guarantees available.*
- *Pre-existing building defects that aren't possible to rectify.*

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

Building on established OFGEM procedures we would suggest a Chartered Surveyors or Structural Engineers report.

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

A Chartered Surveyors/Structural Engineers Report (or similar) should be the mechanism to identify why this area can't be insulated.

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

A Chartered Surveyors/Structural Engineers Report (or similar) should be the mechanism to identify why this area can't be insulated.

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

A Chartered Surveyors/Structural Engineers Report (or similar) should be the mechanism to identify why this area can't be insulated.

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

g) 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, as with the criteria for primary measures we believe it is sensible that these rules are the same as those applicable to the eligibility of primary measures. This saves confusion.

h) Do you agree that this minimum level should be set at 50%?

We feel that 50% provides the necessary flexibility and as with primary measure eligibility, cost benefit considerations will ensure that the maximum practicable area is insulated.

QUESTION 3.

Compliance with Building Regulations: Installation of a measure

a) 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.

After careful consideration we do not believe that there needs to be an additional requirement within ECO Guidance to prove compliance with Building regulations.

After attending the recent OFGEM workshops it was clearly evident that this requirement is being driven by poor quality installations as identified by the OFGEM team or their agents.

Compliance with Building regulations is deemed as adherence to legislated insulation levels, heat loss values or thermal properties. This does not in any way address quality of any individual installation.

Industry driver s to ensure and address quality falls squarely within the PAS2030 framework.

All Installers who are accredited under PAS2030 are accredited on the basis of their internal measure journeys, individual measure quality and the use of a suitable PAS2030 approved system.

NIA has highlighted to DECC and OFGEM on many previous occasions that there is significant evidence of light touch accreditation bodies who are accrediting Installers using a 'light touch' process. Good examples can be seen on any internet search where the promotion is titled Fast Track/Easy/Quick Training or similar.

In many instances Installers are being accredited without site based install evidence being assessed.

This seriously effects install quality and is a dangerous precedent that's been set within Industry.

We would suggest that consistent poor quality installations are referred back to the Installers accreditation body with a copy to UKAS. Consistent failures should result in a robust review by UKAS. This will assist in eliminating the quality issues as evidenced by OFGEM.

With regards to Building Regulations; all systems (CWI/SWI) have to have BBA approval. BBA approval of the system also dictates how this should be installed to comply with current Building regulations – this is also covered in PAS2030.

Provided Installers are registered for the 'BBA Approved System' they have installed in a property then no further evidence should be required.

Please note;

1. *System Designers and Manufacturers also accredit installers; this is a process that is in addition to PAS2030. Usually this involves comprehensive training and on-site assessments.*

   Quality related issues should also be forwarded the relevant System Designers and/or Manufacturers in the same manner as suggested for PAS2030 Quality failures.

2. *Building Regulations differ between measures; some measures do require notification and some do not. Additionally, Building regulations vary within individual UK Country's.*

3. *External Wall Insulation requires Building Control notification and this is covered via PAS2030 guidelines and the Guarantee system which asks for this detail prior to a guarantee being issued.*

In summary we deem it wholly unnecessary to add this requirement as it will add time, complexity and cost.

It also adds an unnecessary burden on timelines with Suppliers likely to wait until Building Control approval before accepting a measure that they can safely bank.

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

The proposal to require property specific evidence could add significantly to the complexity and costs of demonstrating compliance.

In the unfortunate event this is introduced we would suggest the following;

For England and Wales we would suggest an approach based on evidence to determine that work was undertaken by a member of a competent person's scheme, such as CWISC in the case of CWI.

In Scotland, where fitment of CWI is not notifiable, or for measures where a competent person's scheme is not available, the following should suffice;

1. *Evidence that the System used was technically approved for the building construction type, such as a BBA Agrement certificate or similar.*

2. *Evidence that the installation was completed according to the relevant technical approvals - PAS 2030/Manufacturers/System Designers guidelines etc.*

c) 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.

As under version 1.1a we would suggest an approach that could be based on evidence that work was undertaken by a contractor who was a member of a relevant competent persons scheme (CPS) or approved by BBA as part of the System Certification, such as CWISC in the case of CWI.

We believe that the independent assessment of CPS schemes by UKAS would provide a higher level of assurance than the suggestion posed in question 3.

Our considered opinion is that the controls necessary to address quality already exist via PAS2030.

d) 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.

We believe that it important that the revision of the guidance is used as an opportunity to simplify administration rather than complicate and add costs.

Therefore we would suggest that these proposals are;

1. *Not introduced at all (except for minimum insulation levels).*

2. *Introduced at a later point; no earlier than April 2015 and only once the proposed alternative of basing compliance on evidence that the contractor was covered under a competent person's scheme can be evaluated.*

Early introduction of this proposal would be a major blow to an already fragile market. Ideally, a number of elements within this consultation should be dropped to due to the significant and unnecessary impact this will have on install timelines.

QUESTION 4.

General comments on our guidance (version 1.2)

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

We welcome confirmation that suppliers do not need to hold all evidence but can 'outsource' Installers to hold this.

Under 4.63 covering eligibility of district heating it is not clear how the existence of wall insulation can be demonstrated without a disruptive investigation potentially causing disturbance and invalidating any Guarantees. Therefore one alternative would be to require confirmation that a CIGA or alternative/relevant Guarantee exists for the property.

Whilst HTT and Standard cavities are now classified as a single primary measure, it needs to be recognised that where a HTT cavity is treated additional safeguards and technical requirements may apply.

In version 1.1a the requirement for a Chartered Surveyors report for HTT cavities was intended to ensure that they were correctly classified. Therefore it is not clear why in Annex 1 a CS report is still specified for HTT measures, although HTT cavities should continue to be covered by an appropriate Guarantee which would ensure that that necessary checks have been carried out and that a product technically approved for the application was installed.