



GGF consultation response to 'Energy Companies Obligation (EC): Consultation on the changes to the Guidance for Suppliers'

The Glass and Glazing Federation (GGF) is the main representative organisation for companies involved in all aspects of the manufacture of flat glass and products and services for all types of glazing, in commercial and domestic sectors. We represent companies who make, supply or fit, glass and glass related products in the UK and internationally and have approximately 500 members who can be found in over 1,500 business locations throughout the UK.

Members of the GGF include companies that manufacture and install energy efficient windows, in homes and commercial buildings, the performance glass used in every type of building from houses to high-rise tower blocks and the components that are used to manufacture every type of glazing. The GGF's key focus is on improving the energy efficiency of households and commercial premises.

Representing the majority of the key companies in the industry, the GGF has been involved in helping the government to shape the Green Deal and ECO schemes from their inception and has fed into the various consultation exercises throughout. The GGF is supportive of the government's aim to increase the energy efficiency of the UK's housing stock and reduce consumer bills, and believes that ECO is vital to achieving this. We do however believe that in order for the scheme to work better for consumers and businesses, more needs to be done to improve the current schemes and to better incentivise consumers to install energy efficiency measures.

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?

The GGF agrees that cavity wall insulation should be installed to at least 50% of the total exterior-facing wall area of the premises in order to support a secondary measure.

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

The GGF's key aim is to encourage householders to improve the energy efficiency of their properties. It is therefore important that householders are encouraged to undertake works which will help them to fully benefit from the installation of energy efficiency measures.

The GGF believe that householders should be encouraged to install a package of measures in order to significantly increase the energy efficiency of the UK's housing stock. Consumers should therefore be encouraged to take a "whole house approach" to energy efficiency, including energy efficient windows and doors, rather than single measures, to ensure maximum benefit and reduced risk to the building fabric. Including windows with cavity wall insulation within an ECO package, for example, would dramatically improve not only the energy efficiency of the property, but also the likelihood of a package being taken up given their popularity with householders.

The Energy Saving Trust has estimated that as much as 23% of a home's heat energy can be lost through inefficient windows and as such, we ask the government to encourage consumers to install energy efficient windows through offering the various incentives outlined above.

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?



As noted above, the GGF agrees with the 50% benchmark of insulation in order for energy efficient measures to complement each other.

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

Please see the above stated reasons.

2. 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?

The GGF does not have a view on this.

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

The GGF does not have a view on this.

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

The GGF does not have a view on this.

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

The GGF does not have a view on this.

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

The GGF does not have a view on this.

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

The GGF does not have a view on this.

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?

The GGF does not have a view on this.

2h) Do you agree that this minimum level should be set at 50%?

The GGF does not have a view on this.



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.

The GGF is in favour of proposals which will improve compliance with building regulations for any measure which is installed.

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

The compliance of installation with building regulations could be demonstrated by:

- an approval certificate by a building control body, or;
- a building regulations compliance certificate issued by a competent person scheme

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.

The GGF is not aware of any other means of evidencing compliance with building regulations.

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.

The GGF believes that this requirement should come into place for the next ECO obligation period (2015-17). This is because the changes will be able to take place as soon as possible to maximise the energy efficiency potential of the changes, whilst also giving businesses time to adjust to the new requirement.

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

The GGF would strongly encourage Ofgem to include energy efficient windows as an eligible primary measure under CERO, as windows carry wider benefits in addition to the environmental and financial points outlined above.

Whilst reducing carbon emissions is one of the main aims of installing energy efficient measures in a home, there are also broader benefits to doing so. Living in a cold home can be damaging to physical and mental health, particularly for older people or people with disabilities or illnesses. In fact, the World Health Organisation has estimated that between 30% and 50% of excess winter deaths can be attributable to cold indoor temperatures. This means on average at least 65 people a day die in the UK in winter as a result of illnesses due to cold homes. Through improving the energy efficiency of a house, illnesses due to poorly insulated homes could be prevented.

The GGF would be happy to provide further information on this to Ofgem.