



Saint-Gobain Consultation Response
Energy Companies Obligation (ECO): changes to the Guidance for Suppliers
19th September 2014

Introduction

As the world leader in designing, manufacturing and distributing construction materials, Saint-Gobain is committed to meeting some of the fundamental challenges faced by the world today: reducing energy consumption, limiting our impact on the environment, and creating a new generation of buildings which are safe, comfortable and energy efficient. It employs over 193,000 people, 16,750 of which are in the UK and Ireland, and operates in 64 countries.

Globally Saint-Gobain spends over £350 million every year on R&D and its network of R&D centres employ 3500 researchers.

In the UK and Ireland, some of the best known and respected brands in the construction sector are part of the Group, including British Gypsum, Isover, Weber, Celotex, Saint-Gobain Glass, Glassolutions, Saint-Gobain PAM, Ecophon, Jewson, Graham and International Timber. The comprehensive product range spans glass and glazing products, building insulation (exterior, cavity, loft and internal wall), timber products, plasterboard and drylining systems, photovoltaic glass, architectural solar and safety window films, water supply systems, solar solutions and many other building products. They operate from a network of over 1000 distribution sites and 40 manufacturing plants. Together they offer a range of high performance and innovative products that help create a more sustainable built environment and improve our daily lives.

The response below is being submitted on behalf of all Saint-Gobain businesses in the UK associated with construction.



Response

New CERO primary measures: Minimum insulation level to support a secondary measure

Cavity wall insulation

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, in order to remain consistent with criteria for other insulation measures. However, we believe secondary measures should not be eligible for ECO funding prior to easy to treat fabric primary measures such as cavity and loft insulation being addressed. A whole house fabric first approach to retrofit is the only way to create buildings that are comfortable and healthy for its occupants.

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

This will simplify the requirements and give consistency across the different measures.

Roof-space insulation

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, although we should encourage the insulation of the entire area where possible. However, we believe secondary measures should not be eligible for ECO funding prior to easy to treat fabric primary measures such as cavity and loft insulation being addressed.

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

This will simplify the requirements and give consistency across the different measures.

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

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. However, where access cannot be gained to part of a roof, and where it is cost-effective to do so, a loft hatch should be fitted in order to gain access to install insulation. This would represent an overall cost benefit in reducing energy usage. E.g. where the amount of energy lost if the roof space is left uninsulated would be more costly than the price of installing a hatch.

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

Yes. Isolated properties within a block of flats cannot be individually insulated. Also, kitchens abutting an external wall could not be insulated without extra costs associated with the upgrade.

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

Photographic evidence alongside an assessor / surveyor report. Cavity inspections. Site visits with reports. Where social housing is being upgraded it may be deemed each house type has the same layout and that a benchmark can be taken against this for survey purposes to reduce unnecessary cost.

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

Yes. Where there is a lack of ventilation or if the roof pitch is too low.

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

See answer to 2c.

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

If there are bats (rare / endangered species) in the loft space.

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, but proof should be required, i.e. via a surveyor / assessor.



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

Yes, however we believe secondary measures should not be eligible for ECO funding prior to easy to treat fabric primary measures such as cavity and loft insulation being addressed.

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, we agree that evidence should be required to prove that an installation complies with Building Regulations in a move to improve final quality and performance. However, this is not possible to do for a product or system prior to installation as the original structure must also be taken into account. Requirements for materials and workmanship under Building Regulations are already set out in Approved Document Regulation 7. CE marking with a performance level capable of meeting building regulations should be sufficient evidence for a product, unless the product is part of a system such as Cavity Wall or Solid Wall insulation system where certification of the system should be required. This is also consistent with Annex D of the Green Deal Code of practice. We believe that the product requirements for the two schemes should be the same and that Annex D of the Green Deal Code of Practice should apply to ECO also. Requiring anything additional for products over and above CE marking and Declaration of Performance may contravene the EU Construction Product Regulation.

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

Approved Document Regulation 7 should be referred to. The only other way to demonstrate compliance is through inspections (by building control or an independent inspector / surveyor) from the supplier based on a ratio of workload.

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.

Refer to 3a and 3b.

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.

We think it should be alongside version 1.2 as it makes sense to make the changes together.



4. General comments on our guidance (version 1.2)

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

Section 4.51 - We believe that before a connection to a district heating system is eligible as a primary measure, BOTH wall and roof-space insulation should be installed at the property. A fabric first approach is believed to be widely accepted across industry and within Government and forms the basis of Part L in 2013 including the use of Fabric Energy Efficiency Standard (FEES).

Section 4.63 (A, B and C) – For cavity walls the evidence should be by the use of bore holes or thermal camera.

Section 4.65 – We would recommend that the definition be changed to ‘internal or external wall insulation which lowers the U-value of the treated walls to the level required within the Building Regulations’.

Further Information

For further information on the Saint-Gobain response please contact:

Jade Lewis

Advocacy Leader

Saint-Gobain Delegation UK

c/o British Gypsum Head Office

East Leake

Loughborough

Leicestershire

LE12 6HX

Direct Dial: +44 (0)115 945 1875

Mobile: +44 (0)7979536734

Fax: +44 (0)115 945 1924

Jade.Lewis@saint-gobain.com

<http://www.saint-gobain.co.uk/>