



Andrew MacFaul
Consultation Co-ordinator
Ofgem
9 Millbank
London
SW1P 3GE

DATE

Dear Mr. MacFaul,

**Glass and Glazing Federation (GGF) response to the Energy Company Obligation (ECO) 2015-2017:
Consultation on specific HHCRO requirements**

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 and doors. This includes double and triple glazed windows and doors, rated A+ to C, 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.

The GGF are supportive of the proposed requirements for ECO for the obligation period 2015-2017 and welcome the inclusion of a supplier to be able to credit certain ECO1 measures towards their ECO2 HHCRO as surplus actions. However, the GGF would like to take this opportunity to highlight the important role glazing, windows and doors play in the efficiency of homes.

The installation of energy efficient glazing plays an important role in contributing towards more energy efficient housing. Windows have been proven to be popular with consumers in various energy efficiency trials and as such, should be further promoted in ECO schemes to encourage uptake. The Energy Saving Trust has estimated that as much as 23% of a home's heat energy can be lost through inefficient windows. The installation of energy efficient windows is therefore essential in order to reduce energy loss from domestic homes as part of a "whole house approach", thereby reducing carbon emissions and household bills to help bring people out of fuel poverty.

Although CERO is not the focus of the consultation, 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 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 installation of energy efficient glazing plays an important role in helping to create more energy efficient housing, and given its many benefits, the GGF believes that energy efficient glazing should be incentivised further in government schemes.

We therefore look forward to further developments within the ECO scheme and the GGF are happy to provide any further assistance or information on this matter.

Yours sincerely,

Nigel Rees
Group Chief Executive and National Secretary