

Dear ECO team,

Please find below our response to the consultation questions for which we can provide comments:

Question 2:

a) Do you agree with our proposal that a wall with a section of cavity narrower than 40mm cannot be insulated? Please provide reasons for your answer.

Yes, as the BBA has not approved any cavity wall insulation systems for cavities narrower than 40mm.

b) Do you agree with our proposal that a wall which adjoins a wall which cannot be insulated also 'cannot be insulated'? Please provide reasons for your answer.

Yes, because of the moisture risks outlined in the consultation.

c) Are there any other scenarios where a cavity wall cannot be insulated? Please provide reasons for your answer.

System built properties, Properties with a cavity compromised with debris and cavities with recessed or raked joints in high exposure areas. Filling the cavity in these situations could lead to water penetration or condensations risk.

d) For compliance purposes, how can suppliers demonstrate that a cavity wall cannot be insulated?

By completing a thorough assessment fully documented with photographic evidence to support their findings.

e) Do you have any further comments or suggestions relating to this policy area?

Question 6:

a) Do you think the proposed changes to our requirements will be effective in reducing false claims of virgin loft insulation? Please provide reasons for your answer in relation to each change.

Change 1) Yes, providing the evidence is robust.

Change 2) Yes, providing the customer doesn't feel pressured in any way.

Change 3) Yes.

Change 4) Yes, but to accomplish this may be difficult in practical terms.

b) Do you see any difficulties in implementing these changes? Please provide reasons for your answer.

Change 1) No, providing the evidence can be corroborated.

Change 2) No.

Change 3) No.

Change 4) Yes, the mid-installation inspection is logistically very difficult to accomplish.

c) Do you have any suggestions for other controls or requirements we could introduce to reduce or prevent such false claims? Please provide reasons for your answer.

Change 1) Yes, The person recommending the measure should substantiate their findings with digital photographs obtained on the day the EPC was undertaken.

Change 2) The installer to supply the customer with a pre-paid envelope that will go to the supplier, this will help with impartiality.

Change 3) Yes, the question should say: 'was there any insulation in the loft before the EPC assessment was completed?'.
Change 4) No.

d) Where existing insulation is removed because it is posing health and safety risks and new insulation installed, should the measure be claimed as virgin or top-up loft insulation? Can you provide examples of health and safety risks that would require insulation to be removed and how a supplier could demonstrate these risks?

Virgin Loft. Health and safety risks include: water damage from a previous roof leak or pipe fracture, infestation from Birds, Bats or vermin, asbestos containing materials or an incorrect type of insulation used.

Question 7: (NB: Please see Appendix 1 before answering any of the below questions)

a) Do you agree it is more appropriate to assess quality of installation and the accuracy of scores separately?

Yes, this is reasonable.

b) Do you agree with the proposed reactive monitoring process described in paragraphs 1.45 to 1.56 of Appendix 1? Do you think the monitoring rates are appropriate?

Yes, and the rates appear appropriate.

c) Do you agree that technical monitoring agents should have certain qualifications as explained in paragraph 1.15 of Appendix 1? Can you suggest which qualifications are most appropriate for different categories of measure?

Yes, but it may be better to look at these qualifications in terms of inspection competence, i.e. UKAS accreditation as a certification and/or inspection body under EN 45011/ISO 17065

or ISO 17020, as for PAS 2030 assessment and surveillance. Qualifications as an installer operative in each measure category are not necessary.

d) Are the qualifications listed in paragraph 1.16 of Appendix 1 appropriate for score monitoring agents? Are there any other qualifications that you would suggest?

Being a qualified Domestic Energy Assessor is not always necessary for score monitoring, as the base information can be checked using the monitoring questions by a competent inspection body as above.

e) Do you agree with the proposed timescales for remedial works and re-scoring to be conducted outlined in paragraphs 1.58 and 1.59 of Appendix 1?

Yes, these seem reasonable.

f) Do you have any further comments or suggestions relating to this policy area?

As a suggestion, the use of UKAS accreditation for technical monitoring agents would help ensure independence and that ECO measures are installed in accordance with relevant standards i.e. PAS 2030.

Please do not hesitate to contact us if you have any further questions on these comments.

Regards

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