

## 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.**

We believe that the proposed changes will reduce false claims for virgin lofts – though it will not eliminate them altogether. We believe that the declaration and the new technical monitoring question, drafted in the consultation document, can be worded better to be further reaching – by wording the declaration along the lines of the following: *I can confirm that no insulation was removed in the lead up to the installation - and that no insulation was present, in the loft area, before the loft insulation was installed.*

In any guidance Ofgem need to be clear in their meaning behind 'part of the loft area' in the following statement: *A declaration is obtained from the occupier or the landlord, as applicable, by the installer at the time of installation or handover to confirm that no insulation was present, in all or part of the loft area, before the loft insulation was installed.*

Our understanding is that if a section/area of the loft has no insulation then this area is classed as virgin loft and only this area (m<sup>2</sup>) should be claimed as a virgin loft i.e. not the whole loft area. If no insulation is present in any area of the loft, then the whole loft is claimed as a virgin loft.

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

We envisage logistical difficulties in arranging pre and mid installation inspections. Loft jobs are completed in a relatively short time span and a crew will typically undertake a number in any given day. Our experience from pre and mid installation inspections for Under Floor Insulation has been a level of wasted time for the inspectors due to no shows by the customer and/or crew.

**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.**

We understand there may be difficulties in this but for the benefit of the programme develop a process to check activity against previously notified activity would make it easy for all those involved in the supply chain to validate virgin lofts. Make available details of all Loft Jobs already banked / notified under previous or current obligations – via a controlled access / log on verification to an Ofgem database. (This will be especially useful to determine whether loft insulation removed due to H&S reasons, can have new loft insulation installed and still be notified under ECO) - see point **d)** below.

**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?**

If all of the loft insulation needs to be removed due to H&S concerns then it should be claimed as a virgin loft. Where there are real H&S concerns insulation material will need to be removed and the loft will be back to its pre-install state with little or no carbon savings going forwards - due to the removal of the insulation. If the loft subsequently has loft insulation re-installed then this should be viewed as a new measure.

### Health & Safety Risk

Note: an example of contamination is where two neighbouring properties were suffering H&S issues from rat infestation in their lofts (potential for customer to contract Leptospirosis - Weils' disease and Salmonella). The council quite rightly removed the contaminated loft insulation but failed to replace it. These properties were now back to pre-insulation heat loss. Any previous programme claims for the savings are now incorrect and if the properties don't receive insulation it could leave vulnerable customers in fuel poverty with an uninsulated loft due to contamination. In this example the properties were insulated and the installer is out of pocket as the measures cannot be claimed. In future the installer may not be willing to take this risk again and in different circumstances vulnerable customer may not benefit.

Though the job may have been banked under CERT (or another obligation) – that carbon saving is now incorrect as savings are not being made. The property should become viable for a loft measure again – a process needs to be developed to support people unfortunate enough to experience infestation (or other issues), that may lead to them losing their loft insulation - and therefore money through with heat loss going through the roof.

Contamination can be shown via photographic evidence

*We have drafted further detail on infestation - potential guidance:*

### **Guidance on contamination, damage and infestation of loft insulation**

Existing loft insulation which is still **fit for purpose** shall be left in situ and topped up where necessary to comply with current building regulations/standards.

Whenever existing loft insulation is found to be unfit for purpose and it has to be removed, the reason for the removal of the existing loft insulation shall be recorded. All supporting evidence - including photographic evidence – supporting documentation – insurer's letters - signed customer statements shall be retained for a minimum of six years.

Examples of insulation being unfit for purpose include:

- Health, safety and welfare concerns (e.g. asbestos fibre / ACM / hazardous material contamination)
- Contamination due to various infestation (see types of loft infestation below) or pigeon/bird litter
- Contaminated insulation – e.g. with excessive amount of rubble, dirt and dust
- Mould forming - due to prolonged damp atmosphere being present in the loft – caused by poor ventilation
- Insulation that has broken down: – older insulation takes on powder-like properties and loses the ability to trap air, negating the insulating properties of the insulation
- Insulation that has accidentally been subject to an excessive amount of water e.g. from leaking pipes – from leaking roofs in extreme wet weather – from melting snow draining into the loft etc.

### **Types of Loft Infestation**

Types of **Vermin** infestation in a Loft:


**Mouse Droppings** - thin, spindle-shaped (pointed ends), about ½ cm

**Brown Rat Droppings** - blunt, spindle-shaped, 1½ to 2cm

**Black Rat Droppings** - pointed, sausage-shaped, 1½ cm in length

**Squirrel Droppings** - similar to Brown Rat droppings, rounder, 1½ to 2cms

**Bat Droppings** - - dark brown or black, 4-8mm long. Similar to mouse droppings, but crumble into a fine powder when crushed.



Can lead to: Leptospirosis /  
Weil's disease from rat urine.  
Salmonella

Types of **Insect** Infestations in a Loft

An insect infestation is most likely to be caused by attraction to food, textiles or wood stored in your loft, or they may be living off the droppings of other pests in the loft such as rats, mice, squirrels.

- Moths and their caterpillars attacking insulation or stored items in a loft
- Woodworm – initially boring into beams and woodwork
- Other insects e.g. wasps

**Note: Before proceeding with the re-insulation a Loft – whatever issue has led to the removal of the insulation must be resolved first.**