Energy Company Obligation 2015-2017 (ECO2): ECO2.2 Consultation

Question 1:

a) Do you agree with our proposed requirements for pre-existing roof insulation? Please provide reasons for your answer.

Answer:

Yes, as these U-values are worse than those existing in the current AD L1B which is set at 0.35 W/m^2.k (Section 5, Table 3) and therefore captures buildings well below the current U-value rating.

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

Answer:

Not withstanding our agreement with the proposed requirements we believe there is a problem with the means of assessment so installers need to be given a practical means of assessing pre-existing insulation.

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.

Answer:

If there is a likelihood of damp issue arising then we agree. However, if mortar bridging of the cavity already exists, then damp issues are already likely to exist so cavity fill should be avoided. If there are no indications of damp issues then the use of waterproof insulation infill should be considered.

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.

Answer:

We disagree because if a reasonable percentage of a wall can be insulated then this is better than no insulation at all. Equally, we believe that most walls can be insulated but it a question of how much money you wish to throw at the problem. Maybe, the more expensive solutions put the work outside the terms of ECO improvement.

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

Answer:

In areas where driven rain is an issue e.g. west coast of Scotland, the South-West of England and the northern coast of Northern Ireland. The exterior weather wall quickly becomes saturated and takes time to dry out so may well transmit damp across the filled cavity to the interior leaf if the wrong type of insulation is used.

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

They would have to use a camera to view the view the cavity itself.

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

Insulation of party walls and walls facing enclosed passageways need to be included.

It is important that the quality of work undertaken to retrofit cavity walls with insulation is of an acceptable standard and that includes the decision making process on whether to commit to this action or not.

Question 3:

a) Do you agree with our preferred approach (Option1) for calculating the lifetime for multi-fuel DHS upgrades? Please provide reasons for your answer.

Answer:

No. The proportion of CO_2 saving achieved by each generator will depend on the mix of fuels used. This may well vary across the life of the generator and from generator to generator, so a single figure would not be representative for the generators life time.

b) If you do not agree with Option 1, do you agree with any other proposed options for calculating the lifetime for multi-fuel upgrades? If not, can you propose an alternative approach for calculating the lifetime for multi-fuel DHS upgrades?

Answer:

Option 3 – assumes the lifetime is equal to the shortest lifetime of the DHS heat generators. This gives a single figure which can be used universally around the country irrespective of fuel physically used.

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

Answer:

Savings will also depend on the maintenance schedule for each boiler to maintain its efficiency. Some reporting system needs to be introduced to ensure this takes place.

Question 4:

a) Do you agree with our proposed definition of a 'broken down' ESH? Please give reasons for your answer?

Answer:

Yes.

b) Do you agree with our proposal for judging that an ESH cannot be economically repaired? Please give reasons for your answer.

Answer:
Yes, we agree.

c) Do you agree with the thresholds given in the ESH Economic Repair Cost Comparison Table? Please give reasons for your answer.

Answer:

Yes, as industry has approved these figures.

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

Answer:

No.

Question 5:

a) Do you agree that 'boiler and system sludge' and 'unstable firing' alone are insufficient reasons for a boiler to be repaired? Are there any other faults which on their own are insufficient reasons for a boiler to be replaced? Please give reasons for your answer.

Answer:

Yes. Complete failure to ignite/fire would be a fault on its own which would be of insufficient reason for the boiler to be replaced.

b) Do you agree that 'no boiler ignition' and 'unstable firing' should be considered separately? Please give reasons for your answer.

Answer:

Yes. The causes of these two faults may well arise due to different issues which require different remedies.

c) Do you agree that the boiler fault list is suitable to identify faults with non-gas fuelled boilers? Please give reasons for your answers.

Answer:

We do not feel that we are competent to answer this question.

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

Answer:

No.

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.

Answer:

Only to a small extent. The only relatively full proof system is to have a completely independent person to verify that no loft insulation was present in the first place by using photographic evidence.

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

Answer:

No if you pursue the measures suggested, however, you cannot be certain the responses are honest unless the loft is inspected independently.

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.

Answer:

Only by appointing independent inspectors who provide photographic evidence before any work begins. It is possible with modern cameras to over print the photograph with the location of the property using a Global Positioning System (GPS).

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?

Answer:

Yes, it would be fair to regard this situation as being virgin insulation.

Examples of where existing insulation may have to be removed would be where vermin infestation existed, the existence of wasp nests, a build up of bird/bat droppings etc., the insulation had become wet or, in the case of some older types of insulation material where these have the tendency to breakdown into dist.

Question 7:

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

Answer:

Yes.

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?

Answer:

Yes to both questions.

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?

Answer:

Yes, the technical monitoring agents should be appropriately qualified. The qualifications for monitoring personnel must be based on a membership grade set by their professional body which is above and beyond the academic/trade qualifications. A professional body can withdraw a level of professional recognition whereas a basic qualification cannot be withdrawn no matter how poor the quality of workmanship proves to be.

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?

Answer:

Don't know.

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?

Answer:

Yes, but would go further and insist on retraining of installers before they can continue their trade.

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

Answer:

There must be a sufficiently tough penalty for installers who consistently have failures such that their future livelihood is put under threat unless their competency dramatically improves.

Duncan King
Technical Manager
Construction Products Association
duncan.king@constructionproducts.org.uk