Please find our (HHIC) response to your consultation below, we had several responses from our members.

1. As a general comment there are problems listed on the "boiler fault list" which are not directly boiler faults and which would be more accurately described as "System" problems not boiler faults. These could result in the boiler not functioning properly / efficiently.

The first action should / must be to investigate if the system problems can be economically repaired and then to consider if permanent and economically un- repairable damage has been done to the boiler. Only then should boiler replacement be considered under the ECO scheme.
I point here particularly to gas rate and / or gas supply pressure outside boiler manufacturers tolerance and where the most likely causes are insufficient checks of the availability of gas during installation or a change in the availability since installation. Similarly System sludge has it's origins and solutions in problems in the system, perhaps incorrect treatment of primary water.

Point k on the boiler fault list which currently reads
k) for combustion boilers only , unsatisfactory hot water flow rate or temperature.
This would benefit from the additional text at the end to give :-
k) for combustion boilers only , unsatisfactory hot water flow rate or temperature which are outside the manufacturers specification / tolerance.

Turning to the questions in the consultation which you request a response on (Consultation repeated in red with my comments in blue):-

Question 5:
a) Do you agree that 'boiler and system sludge' and 'unstable firing' alone are insufficient reasons for a boiler to be replaced? Without further investigation of the cause and the potential for economic repair these faults would be insufficient reason, the proposal hints that the most likely response to unstable firing is a repair. But it all depends on the root cause findings, the damage identified as having been caused, the potential for economic repair and availability of spares. So in some (uncommon) circumstances these faults when investigated may lead to the conclusion that a boiler replacement is the most effective solution alongside the correction of the root cause of the problem. Are there any other faults which on their own are insufficient reasons for a boiler to be replaced? With a similar argument (and as discussed above) gas supply and gas pressure faults are much more likely to require a system (gas supply pipe) corrective action than a boiler replacement. Please give reasons for your answers. (All ready given in the response)
b) Do you agree that 'no boiler ignition' and 'unstable firing' should be considered separately? Please give reasons for your answers. Yes , because in terms of determining the root cause and assessing the possibility of economic repair there are differences between these two faults.
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. No comment
d) Do you have any further comments or suggestions relating to this policy area? Only the suggestion for point k) see above.

2. I agree with your assessment that some faults are not a reason to replace a boiler.

   However, I am surprised that they are not considering one major factor for replacing the boiler.

And this is proving how efficient the boiler operates. This is what the whole debate is all about.

Therefore I suggest to add flue efficiency to the equation.

Every installer uses a flue gas analyser these days. Therefore it would be easy to stipulate a flue efficiency threshold as to when the boiler is eligible to be replaced.

My suggestion is that flue losses of >10% is an eligible criteria for 'not functioning efficiently'. All other fault criteria are usual wear and tear and can be repaired, and I wouldn't class this as 'not functioning efficiently'.

There are loads of old boilers in the field which home owners don't want to replace because they are working, but i think it comes the time now where we have to tell home owners that these in-efficient devices are no longer acceptable.

If you could confirm receipt of our response.

If you require any further clarification, please do not hesitate to ask.

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