



Knauf Insulation response: OFGEM ECO 2.2
consultation

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About Knauf Insulation

Knauf Insulation is a global manufacturer of insulation products and the largest manufacturer in the UK operating four factories servicing both new build and refurbishment markets.

We have responded to the questions that match our area of operation.

Question 1:

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

No – The recommended loft insulation depth for maximum savings is 270mm. Funding is currently available under ECO to top up loft insulation from the document's recommended 100mm level to this level. There is a disconnect between policy approaches if 100mm is deemed satisfactory for this element of the supplier obligation but worthy of support under another.

In reality the approach also offers a chance to 'put right' displaced or squashed insulation, loft hatch insulation etc that may not currently be present.

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, at the moment.

- 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.

The lack of suitability to be insulated should be confirmed by a suitably qualified individual – e.g. a chartered surveyor.

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

Yes, reasons not to install cavity wall insulation are well documented within ECO guidance such as:

- No functioning DPC
- Excess rubble/mortar in the cavity
- Random stone construction
- Brickwork not in suitable condition

However, rectification work could enable some of the above to be insulated. As with the chartered surveyor report recommendation made in the previous response, a surveyor report should be commissioned to decide whether any rectification work to the cavity can be done cost-effectively.

Others are simply not suitable – e.g. random stone.

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

A Chartered Surveyor report recommendation with supporting photographic evidence.

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.

Yes - this should help reduce false claims. Although this does not represent a robust audit process backed by tangible penalties for offenders.

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

No

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.

Removing the ability for any installer who repeatedly offends to take part in ECO in future would be a preferred penalty for false claims although we appreciate policing this cost effectively is difficult.

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?

It is unclear what 'health and safety' risks the question refers to. There are circumstances where insulation may need removing and replacing due to compression making it ineffective (ie storage piled on top). In that case, it should be claimed as virgin if replaced as the current insulation is not performing.

Again photographic evidence should be provided.

Question 7:

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

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?

The approach may create perverse incentives.

Obligated energy suppliers are obliged to carry out technical monitoring on their contractors. This monitoring clearly has a cost to the energy suppliers.

Therefore, third party inspection organisations who take quality standards seriously may be presumed to fail a larger number of installations, thus incurring larger costs on obligated energy suppliers. It therefore follows those inspection organisations which take quality standards more seriously will be less likely to secure contracts with the obligated energy suppliers than those who fail fewer installations.

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?

We would suggest those agents monitoring decisions linked to Cavity Wall Insulation should be BBA approved surveyors for Cavity Wall Insulation