



## ECO 2.2 Consultation Response

### Question 1:

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

***We agree.***

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

***No.***

### 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 present there are no approved technologies to insulate a cavity less than 40mm. Any installation of this nature would be ineligible for a required 'appropriate guarantee'.***

- 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, insulating walls which adjoin a wall which cannot be insulated would increase the risk of condensation.***

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

***A cavity wall would not be suitable for insulation if there is no BBA approved product/system.***

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

***Typically reasons why a cavity wall could not be insulated could be justified by either a Borescope photo of the cavity; alternatively a photograph showing that the wall thickness is not suitable for insulation.***

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

**No.**

**Question 3:**

a) Do you agree with our preferred approach (Option 1) for calculating the lifetime for multi-fuel DHS upgrades? Please provide reasons for your answer.

***This seems logical, although sits outside the remit of the NIA.***

b) If you do not agree with Option 1, do you agree with any of the 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?

***Agree with Option 1, although sits outside the remit of the NIA***

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

***No further commentary.***

**Question 4:**

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

***This seems logical, although sits outside the remit of the NIA.***

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

***This seems logical, although sits outside the remit of the NIA.***

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

***This sits outside the remit of the NIA, and we therefore are unable to provide commentary on this point.***

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

**No.**

**Question 5:**

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

***This seems logical, although sits outside the remit of the NIA.***

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

***This seems logical, although sits outside the remit of the NIA.***

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.

***This seems fit for purpose, although sits outside the remit of the NIA.***

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

**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 in relation to each change.

***We disagree that the proposed changes would in any way reduce false claims of virgin loft insulation.***

***We do however agree with Point 1 and feel it's essential that access is gained for all loft related visits to ensure all subsequent carbon calculations are undertaken on an evidence based approach.***

***Points 2, 3 & 4 would be ineffectual in reducing false claims as they are easily by-passable by any agent wishing to falsify claims.***

***Point 4 is also unnecessary and unviable. To install a Virgin loft under ECO requires the visit of Approved Technical Assessors, Domestic Energy Assessors, ECO RICS Chartered Surveyors (potentially) as well as Green Deal Installers. By including a Technical Monitoring Agents visit to this list adds significant cost.***

***Additionally, non-compliance in this area relates to fraud and not policy. Adding oversight costs will not remedy fraud issues but instead increase delivery costs across the supply chain. An additional cost burden would prove disastrous within the current ECO framework. Instead we would recommend a more robust approach to PAS2030 oversight.***

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

***The Technical Monitoring Agents visit as well as adding significant cost into ECO delivery would also require Homeowners/Tenants to be present for another visit. This would significantly reduce the quantity of ECO measures being delivered as it adds another level of complexity and disruption to an already overly complicated scheme.***

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.

***There are no fail safe solutions to ensure that Virgin loft claims have not been falsified.***

***False claims can be reduced by adding a requirement for photographic evidence to substantiate a Virgin Loft Claim. This coupled with the declaration mentioned in 6.5 (which on its own is ineffectual) could be incorporated into the Declaration of Conformity.***

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?

***Loft Insulation shouldn't be claimed as virgin unless the existing insulation is compromised and has to be removed.***

***There a number of health and safety risks whereby insulation should be removed including (but not limited to):***

- ***Asbestos***
- ***Fire/Water Damage***
- ***Infestation.***
- ***Polystyrene bead installed. Polystyrene is a fire risk within loft spaces.***

***Installers would also require access to previous scheme data to ensure that funding has not previously been claimed.***

Question 7:

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

***Technical Monitoring should be separated into its component parts (installation methodology & scoring) to ensure that measures are evaluated correctly.***

***Accuracy of scoring fails should not be attributed to an installer who has installed a measure to its appropriate PAS 2030 standard. It should be attributed to the Domestic Energy Assessor or their oversight body for corrective action.***

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?

***This would reduce ECO costs and help to provide a consistent framework for all installers to work towards regardless of which Energy Supplier they submit Carbon to.***

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?

***All Technical Monitoring Agents should be appropriately trained to carry out their relevant assessments (whether Scoring or Installation based). Energy Suppliers need to ensure they are satisfied that TM Agents are fit for purpose.***

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?

***Domestic Energy Assessors or suitably qualified personnel should be monitoring carbon scoring on ECO measures.***

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?

***This seems logical and would provide a simple and consistent framework.***

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

***We would encourage Ofgem to include installers in the forthcoming Technical Monitoring template review and we would be happy to provide representatives. This would ensure that practical questions are included and the template is more in line with established best practice.***

***NM/NIA/20015***