

ECO 2.2 Consultation – ROCKWOOL Response

Q1 a) Do you agree with our proposed requirements for pre-existing roof insulation? Please provide reasons for your answer.

While we broadly agree with the proposed requirements for pre-existing roof insulation, there is a risk that the relatively low standards set could mean that low cost measures, specifically top-up loft insulation, are not encouraged. This would mean missing out on the easily available, albeit modest, carbon and cost savings associated with this measure.

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

No further comments.

Q2 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.

While we strongly support the proposal that cavity wall insulation should not be used in multi storey buildings where the wall has a section of cavity which is less than 40mm as high rise buildings are subject to greater risks associated with the higher levels of exposure to wind driven rain, we do not agree that such walls cannot be insulated. ROCKWOOL has extensive experience of insulating these buildings with external wall insulation solutions which offers a weather resistant energy efficiency solution.

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.

No we do not agree with the proposal that a wall which adjoins a wall which cannot be insulated also 'cannot be insulated' as much will depend upon the nature of the walls in question. The appropriateness of wall to be insulated should be judged by a suitably qualified professional.

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

Another scenario may be non-traditional building types for which no insulation system has been approved (and/or where no guarantee is available).

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

To maintain consistency with other administrative requirements, a Chartered Surveyor's report should be required as evidence.

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

ROCKWOOL understands that cavity party wall insulation will be included as a primary measure within ECO. We strongly support this development which potentially opens up millions of homes to the substantial energy savings that can be achieved by this measure.

However, we would strongly urge Ofgem to attribute a more realistic in-use factor to the thermal performance of this measure. The in-use factor attributed to the measure is far too high which

unfairly impacts the attractiveness of this measure compared to other energy saving measures, and does not reflect the potentially massive energy savings available. The high levels of performance of this measure (heat loss through uninsulated party cavity walls can be equivalent to the heat loss from the remainder of the entire insulated envelope of the building) have been demonstrated in real-life scenario testing not through calculated values.

Q6 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.

The proposed evidence to demonstrate eligibility as virgin loft insulation is unlikely to be effective in its current format. A declaration from the occupier or the landlord should be obtained prior to the installation taking place and not during the installation or at handover. This declaration should be mandatory along with the evidence that the assessor was able to gain access to the loft. Technical monitoring should be used to provide an additional level of authentication and not as a means of demonstrating compliance.

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

No comments.

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.

As described in our answer to Q6a) above i.e. "A declaration from the occupier or the landlord should be obtained prior to the installation taking place and not during the installation or at handover. This declaration should be mandatory along with the evidence that the assessor was able to gain access to the loft. Technical monitoring should be used to provide an additional level of authentication and not as a means of demonstrating compliance."

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?

We are not aware of any health and safety risks associated with materials currently and commonly used in lofts. Where existing insulation is removed and replaced, this must be counted as a top-up loft insulation as a proportion of the savings are not 'new' to the building. As a large proportion of loft insulation installations would have been carried out under previous energy efficiency schemes, there is an inherent risk of double counting of the carbon savings attributable to schemes if it is accepted that removal of insulation can be claimed as a virgin loft. It would also act as an incentive to unscrupulous individuals to make fraudulent claims about the suitability of existing insulation.

Q7 a) Do you agree it is more appropriate to assess quality of installation and the accuracy of scores separately?

Yes we agree that it is appropriate to assess quality of installation and the accuracy of scores separately as these are separate processes.

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?

Yes we strongly agree with the proposed reactive monitoring rates described and believe that these, in combination with a quarterly monitoring period, are more conducive to identifying and tackling poor performance than the current technical monitoring rates.

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?

Yes we agree that technical monitoring agents should be suitably qualified.

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?

No comments.

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?

No we do not fully agree with the proposed timescales for remedial works and re-scoring to be conducted. Paragraph 1.58 gives suppliers three months to remedy or re-score a measure. However the attributed savings should be revoked immediately and not awarded unless the remediation or re-scoring takes place. It should not take six months following the discovery of the failure.

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

No further comments.