

ECO 2.2 CONSULTATION: SCOTTISH GOVERNMENT RESPONSE

Question 1:

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

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

We agree with the proposed requirements.

However, we are interested to hear more on the intention contained within para 1.16 of EPC assessors to undertake score monitoring separate from their EPC assessor role. We understand that Approved Organisations in Scotland have not been consulted on this proposal. We would be keen to understand more on the background to this proposal and what the intended roles, responsibilities and liabilities are. We are also interested in discussing with you the potential for a conflict of interest if the scoring assessor also produced the initial EPC.

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.

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.

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

Vented cavities also cannot be insulated.

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

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

There is no mention of the role of NIA / CIGA installers in assessing technical feasibility.

Q3 calculating the lifetime for multi-fuel upgrades of existing DHS connections

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.

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?

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

We are content with the proposed approach.

Q4 Qualifying electric storage heaters

Question 4:

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

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

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

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

Stating that testing must be after a local circuit protective device – a fuse –and or that any re-set button is cleared of a fault would offer avoidance of misuse.

The savings for repair should not be so excessive as to disincentivise fuel switching to gas in on gas areas.

Q5 Qualifying boilers not functioning adequately

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.

Agree that the cited occurrences are insufficient reasons to replace a boiler.

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

these two cited reasons must be considered separately as they are not inter-related. Simply "unstable firing" means the ignition has occurred but the firing does not remain live.

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.

The Boiler checklist would be most relevant to other fuel types but would be best reviewed by industry safety bodies for each fuel type – oil, LPG and possibly HETAS for Wood Chip and “solid Fuels”

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.

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

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.

Photographic evidence (GPS and Time dated) at time of survey would resolve false claims. Also statistical analysis for hotspots of areas or contractors doing a lot of virgin lofts to target the contractors for more detailed technical spot checks.

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?

An HSE compliant Risk Assessment would have to demonstrate that where for example adding more “Top-Up” insulation to existing that was compromising electrical safety by making wiring too warm and thereby contravening IEE Regulations for load. The insulation should be removed by a prescribed methodology and replaced in a method that did not cause the potential for added risk.

Q7 Technical monitoring process

Question 7:

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

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?

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?

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?

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?

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

Generally a GDA or someone with PAS 2030 certification should be able and competent to cover most works: where added skill are required these will normally be Gas, Electrical and Oil and install work where each respective industry has mandatory qualifications.