

Dear Ofgem

The general principles laid out in the consultation documents seem reasonable enough for the first stage of considering equivalence.

I have two points to make on the principles of the approach:

1. A scheme cannot itself achieve accreditation against ISO17065, so the requirement needs to be clear that the scheme should require any Certification Bodies to be accredited against ISO17065.
2. I think the requirement that an equivalent scheme must certify both product and installers is flawed. If a product is satisfactory it should be able to be installed by an installer deemed competent to install such technology by another scheme. Similarly, a competent installer should be free to install any suitable product however it was approved. If an installer had to be certificated under multiple schemes to install different manufacturers product's of the same technology this requirement would be raising a significant barrier to businesses and restricting the capability of an already small industry. A manufacturer would be faced with having to consider whether there would be sufficient installers for it's market appeal or face seeking certification under each scheme just to achieve effective penetration.

Best Regards

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