Questions for Consultation

Question 1

1.1 Do you agree that the default lifetime for wall insulation measures without an appropriate guarantee is 0 years?

Yes

1.2 Please give reasons for your answer.

Products that do not have an appropriate guarantee shouldn't be eligible to get ECO funding

Question 2

2.1 Where there is alternative assurance available in support of the lifetime, do you agree that we should determine the lifetime through a case-by-case assessment of the evidence, up to a maximum of the standard lifetime for that measure type?

No

2.2 Please give reasons for your answer.

There should be an agreed standard test specification throughout the industry. The testing of products needs to be carried out in real situations and not just not under lab conditions.

Question 3

3.1 Do you consider that an alternative approach would be more appropriate in determining the lifetime for wall insulation measures without an appropriate guarantee?

Yes

3.2 If yes, please provide details.

The use of innovative products should be encouraged so that new solutions can be brought forward. However, the determination of suitability and assessment of durability / lifetime needs to be carried out by an appropriate UKAS approved laboratory e.g. BRE and again, in real life walls. Walls constructed in labs are not representative of most of the existing post 1890 cavity wall built homes throughout the UK. Such walls have a range of inherent problems through poor design or construction, such as cavities of varying widths, excessive mortar snots narrowing the cavity, failed DPCs, open mortar joints, cracked brickwork with cored or missing wall ties.

An insulation product with a particular performance characteristic should be substantiated eg enhanced fillability attributes, severe exposure to wind driven rain performance, life-time of flood resilience protection, improved thermal performance.

Question 4

4.1 Do you agree that in some circumstances, remote re-inspections are appropriate?

In some instances but NOT with the points related to Cavity Wall Insulation. In fact a more detailed survey/inspection would be required.

Inspecting the drill hole pattern alone will be insufficient. The areas covered under CWI 1-3 are not comprehensive enough, for example, under CWI 3 the range of potential failures is all encompassing and should be broken down into the individual failure elements in the same way as CWI 4 and CWI 5.

In some instances, particularly with Cavity Wall Insulation there are multiple problems which need to be re-inspected, for example, any individual home may have a number of issues including problem cavities, no DPCs, corroded or missing wall ties, bulging outer leaf, etc, etc. Current practice is only to inspect against one particular aspect in isolation and does not cover the overall condition of the cavity walls.

4.2 Please give reasons for your answer.

Experience with installers is that if work is not carried out in accordance with the BBA requirements then the further “remedial” work is frequently also not carried out correctly. The fact that a property has not been completed in accordance with the BBA certificate is indicative that for post remedial work a higher level of inspection is required ie a thermal imaging survey to assess the fillability and that there are no voids in the insulation which could again result in the transfer of rainwater to the inner leaf and consequent damp associated issues.

Question 5

5.1 Do you agree that it may be possible to remotely re-inspect the technical monitoring failure types we suggest in Appendix 1?

As answer 4.1

5.2 Please give reasons for your answer.

As answer 4.2

5.3 Please list those questions in Appendix 1 where you disagree with the proposal. Please explain your reasons

As answer 4.2

5.4 Please list any other failure types that you feel should be included. Please explain your reasons.

None.

Question 6

6.1 Do you agree that technical monitoring fails can only be re-inspected remotely in cases where the technical monitoring agent has deemed it possible during their original inspection?

Yes, providing that the technical monitoring is sufficiently robust and that the Surveyor carrying out is competent.

6.2 Do you agree that remote re-inspections must be conducted using photographs taken before and after remedial works, and that original photographs must be taken by the monitoring agent during their original inspection?

Yes, and as identified previously, should include thermal imaging of fillability.

6.3 Do you agree that the photographs need to be GPS location-stamped?

Yes.

6.4 Do you agree that the technical monitoring agent should be able to request additional evidence to assist with the remote re-inspection? If so, please provide examples of suitable evidence.

Yes.

Examples include:

- Thermal imaging
- Volumes of fill materials documented through an approved process
- Density check results on fill material
- Wind driven rain exposure calculations for the property
- Flood maps – Environmental Agency

6.5 Do you agree that the remote re-inspection should be conducted by the same agent that conducted the original site audit?

Yes, to take responsibility and prevent different opinions that may reflect on contractors ability to be paid.

6.6 Do you agree that the technical monitoring agent must conduct a site audit if there is any doubt in the evidence assessed during the remote re-inspection?

Yes.

6.7 Do you think that monitoring agents should monitor a minimum percentage of re-inspections on site? If so, what is an appropriate percentage?

Yes, 5% per installation team.

6.8 Please provide any further suggestions for processes that may increase the accuracy of remote re-inspections, or enhance consumer protections.

Thermal imaging

Volumes of fill materials documented through an approved process

Density check results on fill material

Wind driven rain exposure calculations for the property

Flood maps – Environmental Agency

Question 7

7.1. Please estimate the time that could be saved by these proposals?

No time saved at the front end, However, current CWI failure rates will drive the industry towards an increase in inspections, not a decrease, which causes additional time required when rectification is undertaken.