

CIGA submission: ECO Consultation into Lifetime for wall insulation measures without an appropriate guarantee

November 2015

Lifetime for wall insulation measures without an appropriate guarantee

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.

Adherence to the CIGA best practice guidance provides additional assurance that Systems hold appropriate technical approvals and that installation will be completed according to laid down requirements. It also provides consumer protection in the event of a defect in workmanship or materials, including property assessment.

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.

For the reasons cited above the alternative assurance route should only be used to determine a lifetime for measures or applications where there is no recognised appropriate Guarantee available (scenario 4). In order to incentivise quality there needs to be very clear guidance on this point.

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?

No

3.2 If yes, please provide details.

Technical monitoring questions for remote re-inspection

Question 4

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

Due to the technical requirements we do not believe that remote re-inspection is appropriate for building fabric measures.

4.2 Please give reasons for your answer.



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?
No
- 5.2 Please give reasons for your answer.
Whilst it is suggested that drill pattern and making good could be appropriate for remote re-inspection a photographic evidence is not sufficient to check the quality of workmanship or that it was completed by a technicians carded as competent for the CWI system involved.
- 5.3 Please list those questions in Appendix 1 where you disagree with the proposal. Please explain your reasons.
CWI 1.4, 1.5 for reasons above.
- 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?
Not Applicable
- 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?
Not Applicable
- 6.3 Do you agree that the photographs need to be GPS location-stamped?
Not Applicable
- 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.
Not Applicable
- 6.5 Do you agree that the remote re-inspection should be conducted by the same agent that conducted the original site audit?
Not Applicable
- 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?
Not Applicable
- 6.7 Do you think that monitoring agents should monitor a minimum percentage of reinspections on site? If so, what is an appropriate percentage?
Not Applicable
- 6.8 Please provide any further suggestions for processes that may increase the accuracy of remote re-inspections, or enhance consumer protections.
Not Applicable



Question 7

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

Not Applicable

