



*Sustainable delivery through partnership*



## Consultation Feedback

### Energy Companies Obligation (ECO): Consultation on requirements for demonstrating characteristics of hard-to-treat cavities

#### 1. 100% verification of narrow HTTC measures

We recommend for the word “assessor” as defined by Ofgem’s definition in Appendix 1, is renamed to “verifier”. An assessor is a person that assesses the property’s suitability to have cavity wall insulation installed within the definition of Hard-to-Treat (HTT) and is employed by a contractor under the BBA Assessor scheme.

We also suggest that the Verifier’s company is able to work with a member of the supply chain under the following conditions:

- The Verifier’s company is an independent company with no financial interest in any entity involved in the installation of the measure.
- The Verifier’s company is a member of the RICS ECO Assessor Scheme.

The second point establishes a qualifying level of knowledge and professionalism of the Verifier’s company.

We propose for the declaration of recommendation to be undertaken by following this process:

- The installer assesses that the property qualifies as a narrow HTTC through drilling each elevation.
- These holes are repaired with silicone mastic.
- The verifier can then visit site separately of the installer, remove the mastic, verify the measurements on each elevation and renew the mastic. In this case there is no additional drilling. This overcomes the logistical issues of coordinating visits with the installer.
- These arrangements are to be completed before the installation of the measure.



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2. Increased requirements on HTTC measures that require a chartered surveyor's report

We propose that the chartered surveyor company is able to work with a member of the supply chain if the following conditions are met:

- The Chartered Surveyor's company is an independent company with no financial interest in any entity involved in the installation of the measure.
- The Chartered Surveyor's company is a member of the RICS ECO Assessor Scheme.

The second point establishes a qualifying level of knowledge and professionalism of the Chartered Surveyor's company.

Based on the recommendation made above, we do agree that the Chartered Surveyor assesses the site. However, we believe that the person with appropriate skill and experience – the Verifier - already visits every site. This would be the same verifier who visits the narrow cavity measures.

The Verifier would prepare a report with photographs thus presenting suitable evidence demonstrating the measure qualifies as a HTTC.

3. Declaration by Chartered Surveyor

As a result of the proposal made under point 2, the Chartered Surveyor's report would, therefore, be assessed by the Chartered Surveyor for each property following an on-site visit by the verifier.

The only alteration of wording would be "*I have personally assessed each property that has been visited by our verifier, to which this report relates.*"

This alteration would retain the requirement for 100% of verification to be carried out and would be conducted pre installation of the measure.

We would ask you to consider the fact that the present consultation if carried forward as drafted will result in considerable delays to the delivery of the Energy Company Obligation due to anticipated shortages of suitably qualified persons (Chartered Surveyors and Assessors).

Our recommendation will continue to support Ofgem in its drive to secure the delivery of the obligations but also ensure for the implementation to be practical at ground level.

Should you wish to discuss our responses in further detail, please do not hesitate to contact us.

Sincerely yours,

Nicole Barrett  
Compliance Officer