

Dear Eco Team,

Thank you for the opportunity to take part in the Eco 2.2 consultation. Please find our response below.

Question 1:

Proposal for consultation: requirements for pre-existing roof insulation

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

We agree with your proposal provided that the evidence from an EPC confirming the age of dwelling and in cases where the insulation does not match the dwelling age then a u-value calculation should be provided by an appropriately qualified DEA/OCDEA will be accepted and sufficient.

Question 2:

Cavities which cannot be insulated: Pre-conditions for DHS under CERO & CSCO

- a) We agree with your proposal that a wall with a section of cavity narrower than 40mm cannot be insulated. Through experience we have found that there is an increased risk of bridged mortar resulting in a lack of confidence that the full cavity is filled.
- b) We agree with your proposal
- c) No
- d) From a compliance perspective we believe a supplier should be able to demonstrate that a cavity wall cannot be insulated with a report from a chartered surveyor.

Question 3:

Calculating the lifetime for multi-fuel upgrades of existing DHS connections

- a) We agree with your preferred option 1 for calculating the lifetime for multi-fuel DHS upgrades. This is a consistent method of using SAP data as well as being in line with the updated lifetimes of individual fuel technology types.

Question 4:

Qualifying electric storage heaters



- a) We agree with your proposed definition of a “broken down” ESH.
- b) We agree with your proposal for judging that an ESH cannot be economically repaired. However as with qualifying boilers would we assume an electrical heating engineer will have to make these conclusions? Some guidance around the appropriately qualified individual will be useful.
- c) We agree with the thresholds given in the ESH Economic Repair Cost Comparison Table

Question 5:

Qualifying boilers: Not functioning efficiently

- a) Given the industry perspective that boilers with these faults alone can be repaired at a reasonable cost we agree that they insufficient reasons for a boiler to be replaced.
- b) We agree that ‘no boiler ignition and unstable firing should be considered separately.
- c) We agree that the boiler fault list along with notes is suitable to identify faults with non-gas fuelled boilers.

Question 6

Virgin loft insulation: New requirements

- a) We believe that the proposed changes to your requirements will reduce false claims however we are also conscious that the pre and mid inspections will be impossible to book in with TM agents. We are also conscious that you will find some installers may convince the customer to sign a declaration and or tell the technical monitoring agent that there was no insulation.
- b) We believe that option 4 will be far too difficult to implement for several reasons, firstly there is currently a shortage of TM agents and secondly, when appointing agents they do not confirm their availability resulting in making it very difficult to monitor and obtain TM.
- c) We believe a possible way of reducing false claims with virgin lofts is, if a loft measure has been **proven** to be falsely claimed as a virgin loft then the installer will need to do post inspections on all of the lofts that they have submitted through that particular funder.
- d) Where loft insulation is a health and safety risk, photographic evidence and an explanation from an appropriately qualified person should be provided and as a result obtain full funding for the measure.

Question 7

Technical monitoring process: Revisions

- a) We agree it is more appropriate to assess quality and accuracy of scores separately.
- b) We do not agree that a reactive process is a good solution this will increase admin costs and tracking costs. In addition with only a 5% standard some companies may fall under the raider. Therefore standardising across the board is our preferred option.
- c) We agree that technical monitoring agents should have qualifications to avoid false fails.
- d) We agree that the qualifications for the score failures in paragraph 1.16 are appropriate.
- e) We agree with the time scales.

If you have any questions on the above please feel free to contact me

Kind regards

A handwritten signature in black ink that reads "Chandni Patel". The signature is written in a cursive style and is underlined with a single horizontal line.

Dr Chandni Patel  
Technical and Compliance Manager  
Tel: 075401 23141