



Committee on Fuel Poverty

6th August 2019

ECO3: Improving consumer protection

Committee on Fuel Poverty Responses to ECO3 'Improving consumer protection' consultation

The Committee on Fuel Poverty (CFP) is an Advisory Non-Departmental Public Body sponsored by the Department for Business, Energy and Industrial Strategy (BEIS). Its role is to advise the Government on tackling fuel poverty in England.

The Committee on Fuel Poverty welcome the opportunity to comment on the ECO3 scheme and can confirm that we are happy for our response to be made public. The answers to consultation questions are listed below:

Question 1

Do you agree with the proposal for the incorporation of TrustMark into ECO3 and, in particular, for installers to have to be TrustMark registered businesses to deliver eligible ECO3 measures, with the exception of Demonstration Actions and certain District Heating Systems (DHS) measures? In particular, do you agree that the increased financial protection requirements under the TrustMark Framework should apply in respect of ECO energy efficiency measures (except demonstration actions and certain DHS measures)?

We fully support the TrustMark scheme and also fully support that it should be included as a requirement for household energy efficiency measures installed under the ECO energy efficiency and other Government current/future funded energy efficiency schemes.

Question 2

Do you agree that incorporation of TrustMark into ECO3 is sufficient to demonstrate certification and compliance with the appropriate Publicly Available Specification (PAS) standards?

We have no reason to believe that the TrustMark's Framework Operating Requirements will not significantly improve compliance with the PAS standards. However, it is important to remember that the TrustMark scheme covers three main areas:

- Technical competence required to protect consumers and installers, health and safety, underpinned by enforcement procedures to take action on those that fall below required competence levels;

- Quality performance to ensure that measures are installed in a way that meets requirements for performance and the relevant standards; and
- Customer interfacing skills so that those operating within people's homes do so in a way that is respectful and in line with the good customer service that might reasonably be expected of them

For the TrustMark scheme to be successful, it must meet all three of the above criteria. Whilst the quality of installations and technical competence of installers are relatively easy to measure and audit, the customer experience (particularly for those who are vulnerable) is less easy to measure. We would therefore strongly recommend that robust auditing is put in place to ensure compliance, including ensuring adherence by installers to the Trustmark Code of Conduct which requires the installer to consider "how best to take into account the needs of any vulnerable people in the property".

Question 6

Do you agree that, to the extent they would apply to demonstration actions and certain DHS measures exempt from the TrustMark requirements, the current ECO3 requirements should be updated to move to the new PAS standards (PAS 2035:2019 and PAS 2030:2019) subject to similar transitional arrangements to those set out in paragraph 15 above?

Energy efficiency measures for householders are constantly being developed and we support a constant review of new technology, and that any new measures recommended for ECO or other Government energy efficiency schemes should not be approved until full assurance is in place that installation of such new technologies is covered by robust and auditable standards for:

- Technical competence required to protect consumers and installers, health and safety, underpinned by enforcement procedures to take action on those that fall below required competence levels;
- Quality performance to ensure that measures are installed in a way that meets requirements for performance and the relevant standards; and
- Customer interfacing skills so that those operating within people's homes do so in a way that is respectful and in line with the good customer service that might reasonably be expected of them.

Question 7

Do you agree with our proposed amendment to remove the 400% uplift for replacement boilers delivered outside of the broken heating system cap?

No Impact Analysis has been presented. However, in as much as this was the original policy intention, we agree.

Question 9

Do you agree that first time central heating (FTCH) should be eligible in PRS EPC Band F&G rated properties?

We are of the opinion that the expenditure cap for the Privately Rented Sector Minimum Energy Efficiency measures was set too low (£3,500) as this was clearly below the expenditure necessary to upgrade many Band F and G privately rented properties to Band E. As a result of the low cap, the PRS regulations only upgrade 48% of the 106,000 fuel poor privately rented Band F and G properties to Band E and there is therefore a definite need for further action. These Band F and G properties have average fuel poverty gaps of £1,034 per year and we therefore support this proposal.

Question 10

Do you agree that first time central heating (FTCH) should be included in the LA-Flex in-fill?

There is no Impact Analysis to support this proposal. The proportion of the current ECO3 programme that is eligible for Flex was increased from 10% in the prior ECO scheme to 25%. No data was provided in the ECO3 Consultation to support this increased percentage. Government's reason for introducing Flex was to give Local Authorities the ability to help the delivery of ECO for two main categories of private tenure households:

- Fuel poor households, in particular those who are not in receipt of ECO3 eligible benefits; and
- Low income households that are vulnerable to living in a cold home

The Committee on Fuel Poverty fully supports the concept of Flex, but to date no data has been presented by Government to demonstrate that the Flex programme is delivering on its goals. Should data be presented to demonstrate that the Flex programme is working, we would support the proposal to broaden the current Flex programme with in-fill.

Committee on Fuel Poverty

Email: CFP Secretariat: cfp@beis.gov.uk

CFP Gov.uk webpage: <https://www.gov.uk/government/organisations/committee-on-fuel-poverty>