

Marketing green heating and insulation products

Consumer law compliance advice for businesses

Response to consultation document

16 July 2024

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1. Introduction

- 1.1 This document summarises the main comments made by stakeholders to the Competition and Markets Authority's (CMA) consultation on draft consumer law compliance advice for businesses marketing green heating and insulation products.¹
- 1.2 It also sets out the CMA's response to these comments and, where, relevant, the corresponding changes it has made to the final advice. [The final version of the advice is available on the CMA website.](#)
- 1.3 Alongside the compliance advice, the CMA is publishing [two accompanying short videos and two checklists for businesses to assist their understanding and awareness of the key principles](#) set out in the advice.

Background

Call for information

- 1.4 In September 2022 the CMA launched a call for information looking at consumer protection in the UK green heating and insulation sector.² One of the key themes covered by the CMA's review was an assessment of business practices, focussing, in particular, on how businesses promoted their products to consumers and the information they provided.
- 1.5 Businesses often make claims about the benefits or environmental credentials of their products which can influence a consumer's decision-making. It is crucial that people can trust businesses in the sector to provide accurate, transparent and clear information to help make decisions. Unless claims are honest and prices are transparent, people may not have the confidence necessary to switch to green heating solutions, undermining the move to Net Zero.
- 1.6 The CMA's findings report was published in May 2023 and identified several business practices that could mislead consumers.³ In particular, we highlighted concerns that some businesses may be making potentially

¹ <https://www.gov.uk/government/consultations/consultation-on-draft-compliance-advice-for-businesses-on-the-marketing-of-green-heating-and-insulation-products>

² <https://www.gov.uk/cma-cases/consumer-protection-in-green-heating-and-insulation-sector>

³ https://assets.publishing.service.gov.uk/media/6475f1685f7bb7000c7fa176/Consumer_protection_in_the_green_heating_and_insulation_sector_-_Final_report.pdf

misleading marketing claims about the cost saving, environmental and/or energy efficiency benefits of their products. We were also concerned that businesses who present headline prices on their website and other marketing channels take different approaches to what information is included, making it difficult for people to identify and compare prices.

Draft compliance advice

- 1.7 As part of its role, the CMA produces compliance advice and guidance for businesses to clarify their legal obligations and promote compliance. In light of the findings of our review, we committed to providing guidance to help businesses understand and comply with their consumer protection law obligations when marketing green heating and insulation products.⁴
- 1.8 This work closely aligns with the CMA's strategic priorities, set out in our Annual Plans for 2023/24⁵ and 2024/25,⁶ to ensure that people can be confident they are getting great choices and fair deals, and helping to accelerate the UK's transition to a net zero economy.

Consultation on draft compliance advice

- 1.9 Between 13 December 2023 and 24 January 2024, we carried out a public consultation on the draft compliance advice. This was published on the CMA website and subsequently publicised to a range of stakeholders, including trade bodies representing businesses in the sector, standards bodies which set and/or monitor member businesses' compliance with quality and consumer protection standards in the sector, consumer groups, and fellow enforcers of consumer protection law.
- 1.10 We received 28 formal written responses to the public consultation. The list of respondents who agreed to be named are set out at section 3. We thank all respondents for their constructive engagement in this consultation.

Actions following consultation

- 1.11 We have carefully considered all the responses to our consultation, but we do not in this document address every point made in them or set out every

⁴ The CMA's findings report also highlighted concerns that a number of businesses were making potentially misleading claims about hydrogen use in boilers and put the sector on notice for further action. For information on the CMA's investigation into the marketing of 'hydrogen-blend ready' boilers, see <https://www.gov.uk/cma-cases/worcester-bosch-consumer-protection-case>

⁵ <https://www.gov.uk/government/publications/cma-annual-plan-2023-to-2024/cma-annual-plan-2023-to-2024>

⁶ <https://www.gov.uk/government/publications/cma-annual-plan-2024-to-2025/annual-plan-2024-to-2025>

change we have made to the final compliance advice. Instead, we focus on what appear to us to be the main themes which emerged during the consultation, and a summary of these is set out in section 2 of this document. We also summarise the CMA's response to these points and explain whether, and if so how, we have amended the final advice to reflect any of the comments received.

- 1.12 We are now publishing our final compliance advice. We may, of course, review the compliance advice from time to time, to ensure that it remains current and relevant to businesses.
- 1.13 Since the CMA consulted on the draft compliance advice, the Digital Markets, Competition and Consumer (DMCC) Bill has become law but is yet to come into force. The DMCC Act 2024 has given the CMA powers to determine itself whether consumer law breaches have occurred and the ability to impose fines and order firms to pay compensation to affected consumers. The DMCC Act contains broadly similar prohibitions against unfair and misleading commercial practices as are currently contained in the Consumer Protection from Unfair Trading Regulations 2008. We do not therefore expect that the DMCC Act coming into force will have any impact on the substance of the advice.

Next steps

- 1.14 The main purpose of the compliance advice is to help businesses understand and comply with their existing obligations under consumer law.
- 1.15 With this in mind, we have worked closely with key stakeholders in the sector (including trade bodies and standards bodies) to help us in disseminating, and drawing businesses attention to, our compliance advice, as well as in setting out our expectation that businesses will review and, if necessary, make changes to their marketing materials and practices to ensure compliance with consumer law as soon as possible. The compliance advice has also published on the CMA's website.
- 1.16 We are mindful that the majority of businesses currently in the sector are SMEs, many of which are micro-businesses or sole traders. To help businesses understand our key principles, we have created some short videos and 'at-a-glance' checklist guides to the principles - this should help businesses to quickly and easily consider what changes they might need to make to their marketing materials and practices.
- 1.17 The CMA will continue to monitor businesses' compliance with consumer law in relation to their marketing of green heating and insulation products, as part of its general intelligence-gathering functions (for example, through the receipt of complaints or other intelligence about a trader). Should potential

infringements be identified, the CMA or another consumer enforcement body may decide to take action.⁷

- 1.18 The Advertising Standards Authority (ASA) also plays a leading role in ensuring that marketing complies with consumer protection law. Trading Standards Services have a key role to play, too, in taking appropriate enforcement action. We will continue to work closely with those enforcement partners.

2. Response to consultation questions

- 2.1 The CMA's consultation on its draft compliance advice for businesses marketing green heating and insulation products invited responses to the question shown in bold below.
- 2.2 We have carefully considered all the responses received as part of the consultation.
- 2.3 The CMA's response to the main issues highlighted is included after each question.
- 2.4 We noted that a number of consultation responses included points relevant to several of the questions asked. To avoid undue repetition, we have not repeated every point under every question. Instead, we have described the point under the question to which we think it most closely relates. This is in addition to considering it more generally for all aspects of the compliance advice.
- 2.5 It should be noted that the compliance principles in the draft advice we consulted on were labelled alphabetically (Principle A, B, C etc), whereas they are labelled numerically (Principle 1, 2, 3 etc) in the final advice. Where relevant, this is reflected in the CMA responses below.

Questions on scope

Does the draft compliance advice cover all the important issues and practices concerning the marketing of green heating and insulation products? If not, what else should this compliance advice address and why?

⁷ Subject, in the CMA's case, to its prioritisation principles at <https://www.gov.uk/government/publications/cma-prioritisation-principles>.

Are there any additional sector-specific considerations which the draft compliance advice needs to reflect? If so, what are these and why? How can these be addressed?

2.6 The majority of respondents agreed that the advice covered most of the important issues and practices identified in the marketing of green heating and insulation products. Some respondents made suggestions for expanding and clarifying the advice. These are summarised below.

Products within scope

2.7 Several respondents suggested that the advice should not be limited to green heating products (and insulation) but expanded to apply to all forms of home heating, including traditional technologies such as gas boilers. Reasons given included that businesses marketing other types of home heating products were making similar claims around cost savings, energy efficiency and environmental benefits (and so the principles were also relevant to them), and the need to ensure a level-playing field across all technologies in the home heating market.

2.8 A small number of respondents suggested that the advice should explicitly include other emerging forms of low-carbon heating technologies - in particular heat batteries - in the list of products covered, to help 'future proof' it.

2.9 A few respondents highlighted that solar PV had been included within the advice even though it was not a heating product. It was suggested that the title of the advice did not make it clear that it included solar PV products and so should be revised. It was also suggested that the advice should specifically include solar battery storage products given they were increasingly being installed alongside solar PV systems and could be subject to similar misleading claims.

Marketing channels

2.10 A couple of respondents suggested that the advice should make clear that the principles also applied to claims made verbally, such as over the telephone or in person, as well as to other marketing channels. It was also suggested that it was made clearer that the advice covered other forms of marketing, such as advertising via social media, blogs, and advertorials.

Other comments

2.11 Other comments made by individual respondents included the following:

- One respondent suggested that the advice should make clearer that businesses were not only responsible for their own marketing practices but those of their marketing partners;
- One respondent was concerned that the advice could inadvertently convey the impression that consumer law obligations only applied to a business's advertising rather than to all of the information it provided to consumers throughout the customer journey, and in particular failed to address bespoke claims about product performance made at the contractual stage, which they thought had the potential to be more influential and harmful than generic marketing claims;
- Another respondent suggested that the advice should also cover leasing agreements for solar PV and battery products, as they were likely to become more common in the sector in the next few years.

2.12 A few respondents made specific suggestions for including references to sectoral standards and/or guidance, in particular the Microgeneration Certification Scheme (MCS) standards and new Customer Duty, the MCS and RECC publication *Domestic Heat Pumps: A Best Practice Guide*, and the Code for Construction Product Information.

CMA response

2.13 We have carefully considered the suggestions made by respondents in relation to extending the scope of the advice.

2.14 Although consumer law applies widely, we have not prepared this advice for purposes other than advising businesses who are involved in the marketing of green heating⁸ and insulation products.

2.15 When producing advice and guidance for business, the CMA generally focusses on sector-specific issues that have emerged from an in-depth review of a particular market from which we have obtained relevant expertise. Our advice draws on, and reflects, the specific findings of the CMA's review into consumer protection in the green heating and insulation sector. Our review did not focus on other traditional forms of home heating such as fossil fuel boilers (aside from specific marketing claims being made about the capability of some gas boilers to run on a hydrogen blend).

⁸ See paragraph 2.18 of this response below with regard to the inclusion of solar PV products.

- 2.16 Accordingly, we have not amended the scope of the advice. That said, while the advice is not specifically addressed to traditional forms of home heating, the same general principles will usually be relevant to the marketing of other home heating products. We encourage businesses who market other home heating products to ensure they are complying with consumer law.
- 2.17 We do not consider it is necessary or appropriate to expand the list of green heating products that are specifically referred to as being covered by the advice (which are those products the CMA focussed on in its consumer protection review).⁹ Paragraph 1.6 of the advice states that the products covered ‘**include**’ those that are listed, and as such it is clear that this is intended to be non-exhaustive. This approach will also help to ‘future-proof’ the advice as new green heating technologies emerge or become more common.
- 2.18 We have amended the final advice to make clearer why it also covers solar PV panels. Whilst they are not a green heating product, solar PV panels were included in the scope of the CMA’s consumer protection review and are often advertised in similar ways. We have added a footnote to clarify that solar battery storage products (where sold with solar PV panels) are also covered by our advice.
- 2.19 We have made clearer that the advice applies to marketing practices on any marketing channel, including verbal claims made in person or over the phone. We have also added specific references to blogs, advertorials, and pay-per-click adverts.
- 2.20 We have amended the final advice to make it clearer that businesses are still responsible under consumer protection law where material used in their marketing has been created by a third party, such as a manufacturer. We have also made it clearer that the advice applies both to a business’s direct marketing to consumers and to marketing that it provides to a third party, such as an installer, for use with consumers.
- 2.21 As to the stages of the customer journey to which the advice specifically applies, it draws on, and reflects, the CMA’s consumer protection review and findings. Those focussed on upfront marketing claims made by businesses on their websites and in online adverts; we did not look in-depth at claims being made later in the customer journey. We have, however, amended the final

⁹ See Figure 1.1 of the CMA’s findings report
https://assets.publishing.service.gov.uk/media/6475f1685f7bb7000c7fa176/Consumer_protection_in_the_green_heating_and_insulation_sector_-_Final_report.pdf.

advice to make it clear that consumer law applies throughout the customer journey and that any claims a business makes, or information it provides, about its products (including at the quote and contractual stages) must also be truthful, accurate and complete.

- 2.22 We have included additional wording under Headline Pricing Principle 2 ('Comprehensive') of the final advice to cover situations where products are offered under a leasing agreement (or a subscription service) that require consumers to make regular ongoing payments. We have made clear that businesses must clearly and prominently explain these obligations alongside the headline price, as well as other important information about the consumer's rights and obligations under the agreement.
- 2.23 We have added a footnote to the final advice (at paragraph 1.21) to provide examples of other relevant sector-specific guidance businesses need to consider, such as where a business belongs to a CTSI-approved Consumer Code, TrustMark, and/or MCS.

Questions on the Compliance principles

a) Are the principles on presenting price information the right principles? If not, why not? What other principles would help businesses comply with consumer protection law and why?

b) Are the principles on product claims the right principles? If not, why not? What other principles would help businesses comply with consumer protection law and why?

2.24 There was general support for the principles from respondents. It was broadly agreed that the principles were the correct ones and covered the key issues identified in the CMA's findings report.

2.25 The majority of comments made were on the specific principles included in the draft advice, and these are summarised below.

Unavoidable costs that are genuinely variable

2.26 A few respondents commented on the suggestion in Headline Pricing Principle A ('Accuracy') that the headline price must include any inescapable costs associated with the product, such as those which were necessary for

installation.¹⁰ In particular, they highlighted the challenges of including genuinely variable costs in a headline price where the cost could vary significantly. For example, the additional enabling works and retrofitting that might be needed to install a green heating product were likely to be dependent on a number of factors and vary from home to home, which might make it difficult to accurately state a price for the inescapable costs associated with some of these products.

- 2.27 One respondent also highlighted that a manufacturer may not necessarily be responsible for the installation of their products, for example where the product was fitted by an independent installer, and as such could not be held accountable for any installation costs.

Excluding the value of government funding from the headline price

- 2.28 A number of respondents disagreed with the suggestion in Headline Pricing Principle C ('Transparency') that it was always likely to be misleading to include the value of any government funding in the headline price. It was suggested that the advice needed to take a more nuanced approach to reflect that certain government grants had much wider eligibility than others.
- 2.29 A few respondents acknowledged that it was likely to be less appropriate to include the value of a government grant in a headline price where it had strict eligibility criteria. However, a number of respondents suggested that businesses should be able to advertise a headline price with the grant included if most, or a majority, of UK homes would be eligible for the grant and provided that it was made clear that the grant was included in the price, the value of the grant that had been applied, and that the grant was subject to eligibility criteria.
- 2.30 Some respondents referred, by way of example, to the Boiler Upgrade Scheme (BUS) grant, which they indicated was designed to be widely available to homeowners in England and Wales. It was also suggested that discouraging businesses from displaying the headline price of a heating system with the BUS grant included risked presenting an over-inflated price compared to what consumers could reasonably anticipate paying and might negatively impact efforts to drive up heat pump adoption.

¹⁰ See also the related Headline Pricing Principle B ('Comprehensive') in the draft advice in relation to including the costs in the headline price of any enabling works, other products and/or interventions that may be required for the installation of a product and/or to make it function effectively.

Post-purchase running costs

- 2.31 A couple of respondents raised concerns about the practicalities of including information about post-purchase running costs alongside the headline price, as part of Headline Pricing Principle E ('Post-purchase'). It was suggested that it would be challenging for a business to provide an indicative running cost for a product due to the number of variable factors that could affect these costs, including the fabric of the property, the type of housing, user behaviour, the number of occupants in the house, and energy tariff fluctuations. A respondent also questioned whether there was a specific requirement under consumer protection law to provide details of general (non-contractual) ongoing costs in promotional material.

CMA's response

- 2.32 We have amended Headline Pricing Principle 1 ('Accurate') to give clearer guidance in line with the CMA's views of the relevant requirements of consumer law.¹¹ In particular, in circumstances where some part of the headline price genuinely cannot be calculated in advance. The starting point under consumer law is that wherever the total price of its products or services can be calculated in advance, a business must set out a fully inclusive headline price. But, where some part of the total price genuinely cannot be calculated in advance, a business (i) can give an indicative headline price – for example, including an estimate of the typical additional cost – as long as it does so in a way that is not misleading; and (ii) must clearly and prominently explain how the indicative headline price has been calculated and how the cost would be calculated in other cases. This is now reflected more clearly in Headline Pricing Principle 1 of the final advice.
- 2.33 We have also clarified that businesses do not need to include in their headline price the costs of products and services they do not provide. Provided they do not mislead people into thinking it is fully inclusive of other necessary products and services, their headline price need only cover the things they provide. They are more likely to find themselves on the right side of the law if they make clear that consumers will need to incur other costs from other parties for other services (like delivery and installation, or whichever are relevant).
- 2.34 After careful consideration, we have amended and expanded the advice to be clearer about the circumstances in which we consider it is likely to be misleading to include the value of government funding in a headline price, and

¹¹ In particular, the requirements of the Consumer Protection from Unfair Trading Regulations 2008 (CPRs) and the DMCC Act in relation to misleading actions, misleading omissions and invitations to purchase.

where it is more likely to be permissible (see, in particular, Headline Pricing Principle 5 ('Careful in how you refer to access to government funding')). However, it is important that businesses think carefully before deciding to reference the amount of a government grant in their headline price, given this could significantly influence a consumer's assessment of the affordability of their products.

- 2.35 We have made clear that it is likely to be misleading to include the value of government funding (such as a grant) in a headline price if most consumers are unlikely to qualify for it. Where it is included in the headline price (for example, because most consumers are likely to be able to obtain that funding and pay the stated price), we have set out that businesses should clearly and prominently state next to the headline price that it includes government funding, the amount of the funding, and that there are eligibility criteria.
- 2.36 We have also set out other additional transparency requirements where businesses refer to government funding anywhere in their marketing, such as prominently highlighting the name of the government funding scheme and any important eligibility criteria and signposting consumers to further information from the source of the funding.
- 2.37 Some respondents had interpreted Headline Pricing Principle E ('Post-purchase') in the draft advice as implying that the amount of ongoing running costs always needed to be stated. However, this was not the CMA's intention. We have amended the final advice to make it clearer that businesses are more likely to be on the right side of the law where they tell consumers that other ongoing costs exist. Where businesses do provide indicative data about running costs – for example, in relation to any claims made about future cost savings on energy bills – they must not mislead people and should also describe the variable factors that affect them (such as the size of the property, individual homeowners' energy use and fluctuating energy prices) and the effect those factors are likely to have. We have also moved the reference to post-purchase ongoing costs to Headline Pricing Principle 2 ('Comprehensive'), rather than it being a Principle in its own right (as in the draft advice).

Questions on Illustrative examples

Are the illustrative examples provided in the draft compliance advice helpful? If not, why not? How could they be improved?

Are there any additional or different illustrative examples that would help businesses to understand how to apply the principles in the draft compliance advice? If so, what would these cover and why?

- 2.38 Many respondents thought that the illustrative examples of claims that might mislead consumers were helpful in giving businesses a better understanding of how the principles in the advice applied to their marketing.
- 2.39 Some respondents raised specific queries and drafting suggestions in relation to some of the examples in the draft advice, in particular in relation to the reasons why the headline price or product claim could potentially be misleading.
- 2.40 Several respondents suggested that the advice should also include positive examples of headline pricing and product claims that the CMA considered were likely to be compliant with the principles (so that the advice covered examples of 'good' as well as 'bad' marketing practices) to give an element of certainty to businesses. Alternatively, it was suggested that each of the examples in the draft advice should be expanded to illustrate how the claims could be amended to make them more likely to comply with the law.

CMA's response

- 2.41 The CMA is pleased that most respondents found the illustrative examples helpful. We are also grateful for the specific suggestions we received in relation to some of the examples.
- 2.42 We have made minor changes to some of the examples to reflect amendments made to the relevant corresponding principles and specific comments from respondents on the reasons why they could be misleading.
- 2.43 We have carefully considered the suggestion that we include positive examples of claims that are likely to be compliant with the principles, or expand the existing examples to show how they could be changed to make them more compliant. We appreciate that, in theory, it could be helpful to businesses if the advice were to include illustrative examples of what a 'good' headline pricing or marketing claim looked like, but we do not consider it is appropriate to do so. The CMA is unable to approve or recommend 'model' generic marketing claims for use by businesses on the basis that they are (or are likely to be) compliant with consumer law, and therefore will not be open to challenge.¹² In practice, whether a particular headline price or marketing claim is compliant with consumer law will depend on the specific facts and circumstances of each case (including the evidence held by a business to support any claims made) and would need to be assessed according to the

¹² Currently, only the courts can provide the definitive interpretation of consumer law based on the facts of each case.

marketing communication's probable impact when taken as a whole and in context, rather than looking at it in the abstract.¹³

- 2.44 Nonetheless, we have produced additional 'checklists' to further support businesses to quickly and easily consider how to apply the principles to their marketing and what changes they might need to make.

Questions on general and additional issues

Generally, are there any aspects of the draft compliance advice that you consider need further clarification or explanation, and why? In responding, please specify which section of the draft compliance advice (and, where appropriate, the issue) each of your comments relate to.

Any there any other comments that you wish to make on the draft compliance advice?

- 2.45 Some respondents highlighted the need to ensure that the CMA's advice was aligned and consistent with the Advertising Standards Authority's own guidance, in order to avoid the risk of confusion for businesses. For example, a couple of respondents said that the ASA's guidance was more flexible and allowed for some qualifications in marketing communications to be presented 'one click' away from the landing page if the (online) media was significantly limited by space, whereas they had interpreted the CMA's draft advice as suggesting (at Principle D for Headline Prices and Principle B for Product Claims) that all qualifications and conditions should be shown clearly and prominently on the advert itself.
- 2.46 A couple of respondents stressed the importance of emphasising the particular vulnerability of consumers in this sector, given the products can be complex and expensive and they may not be familiar with some of the newer technologies.
- 2.47 Some respondents also mentioned that it was important to keep the advice under regular review given this was an evolving sector, and to monitor for emerging issues and practices for consideration and inclusion in updated versions of the advice.

CMA's response

¹³ This will depend on the medium in which the marketing communication appeared, the audience and its likely response, the nature of the product and any material distributed to consumers.

- 2.48 The CMA has worked closely with the ASA to ensure consistency between our advice and the ASA's Codes and guidance. The principles in the final advice are, in the CMA's view, consistent with businesses' obligations under the ASA's Advertising Codes as well as consumer law.
- 2.49 With regard to the provision of additional information through qualifications, we have amended the relevant principles to make it clearer that important qualifications must always be presented clearly and prominently in the marketing communication (such that they cannot be overlooked), whatever the media. By 'important' qualifications, we mean qualifying information that consumers need to know to make informed decisions, referred to in the relevant consumer legislation (the CPRs and the DMCC Act) as 'material information'. The more important the qualifying information, the greater the prominence is likely to be necessary to ensure that consumers are not misled (by an omission) into making decisions.
- 2.50 In our view, this is consistent with the ASA's guidance on the presentation of qualifications in online media significantly limited by time and space, which makes clear that consumers should not have been misled materially by an omission into clicking an advertisement in the first place.¹⁴
- 2.51 Although our draft advice highlighted the importance of businesses considering the circumstances in which people make decisions, we have further emphasised that this is a sector where consumers make infrequent purchases of expensive and complex products involving relatively new technology that they may be unfamiliar with. In any assessment of whether a business is complying with its obligations under the CPRs (and, in due course, the DMCC Act), account will be taken of the potentially vulnerable position consumers may find themselves in when buying green heating and insulation products.
- 2.52 We will keep the compliance advice under periodic review in light of any developments in relevant case law and emerging marketing practices in the sector, and if appropriate, amend it to ensure it remains up to date.

Overall, is the draft compliance advice sufficiently clear and helpful for the intended audience? Is the language and terminology helpful? In particular, we are mindful that the majority of businesses in the sector are SMEs, many of which are micro-businesses or sole traders.

¹⁴ See <https://www.asa.org.uk/static/5ef9f4e1-3949-4978-af9b08c0c2d21eeb/CAP-qualifications-guidance.pdf>

- 2.53 Generally, a few respondents raised concerns that the legal status of the advice might be unclear to some smaller businesses, who may be less familiar with relevant law and the CMA's role.
- 2.54 A few respondents also reiterated the importance of providing the compliance advice in such a way as to be easily understood by the primary audience of small businesses. Examples included the provision of the advice in more accessible formats and the use of summaries, checklists and key takeaways in the advice itself.

CMA's response

- 2.55 We are conscious that the majority of businesses in the sector are SMEs, many of which are micro-businesses or sole traders who may have a limited understanding of consumer protection law.
- 2.56 To ensure that the advice is easy to understand, it focusses on the key principles that businesses need to be aware of, and follow, when marketing products, supported by practical illustrative examples of how they can be applied to different marketing claims.
- 2.57 In response to specific comments from respondents, we have modified some of the language used in the advice and provided further explanatory text to help businesses understand their obligations. We have also made clearer the status of the CMA advice by expanding and moving clarifying text from a footnote into the main body of the advice document.
- 2.58 As noted at paragraph 1.16, as well as publishing the final advice, we have also produced some additional resources to make the advice as accessible as possible. We have published two short videos and 'at-a-glance' checklists which provide businesses with a simple guide to the principles contained in the advice. We hope all these will mean that every business can easily understand their obligations under consumer protection law and what they must do in order to ensure that their marketing is compliant.

3. List of respondents

Stakeholders that submitted a written response to the consultation:

Advertising Standards Authority

British Gas

Chartered Institute of Plumbing and Heating Engineering

Chartered Trading Standards Institute

Citizens Advice

EDF

Energy Ombudsman

Energy UK

Good Energy

Heat Pump Association

Heat Pump Federation

Heating and Hotwater Industry Council

Home Insulation and Energy Systems Quality Assured Contractors Scheme (HIES)

Installation Assurance Authority

Kensa Group

MCS Service Company Limited

Mineral Wool Insulation Manufacturers Association (MIMA)

Nesta

Octopus Energy Limited

Renewable Energy Consumer Code (RECC)

Rockwool UK

Skoon Energy

Thermal Storage UK

Trading Standards Scotland/COSLA

Trust Electric Heating

TrustMark (2005) Limited (TrustMark)

Vaillant Group UK Limited

Which?