

NATIONAL INSULATION ASSOCIATION (NORTHERN IRELAND BRANCH) RESPONSE TO CONSULTATION ON EXTENSION OF NISEP PROGRAMME AND REALLOCATION OF COSTS BETWEEN CUSTOMER GROUPS.

Members of the Association currently carry out a variety of roles within NISEP, many are installers carrying out measures such as loft insulation, cavity insulation and replacement heating systems within people's homes, others fulfil the role of managing agent for the Utility companies involved with the scheme and several are currently Primary bidders.

Our members are also involved in all of the other energy efficiency schemes mentioned in the consultation document. This variety of roles and breadth of experience, gained over many years and from thousands of insulations gives us a unique perspective on the energy efficiency of our housing stock and the success of schemes designed to improve it.

The Government uses periodic surveys to develop Housing Strategy and also their approach to Fuel Poverty. The latest survey was carried out in 2011 and was unfortunately subject to cost pressure, with the result that the sample used was extremely small, with only 1,434 Houses from a total housing stock of 760,00, being surveyed. It has since been shown that the results published are flawed, particularly in the area of cavity wall insulation leaving some of the conclusions questionable.

Because of this, we believe it is very important that Government now revisits the whole issue of energy efficiency and the impact it has on Fuel Poverty and Climate change. The industry has been working with our local universities and academic bodies over the past two years to better understand the issues and raise awareness of the problems we believe exist. With the development of thermal imagery and the reduced cost of borescopes, we are now able to identify and measure energy loss in our Housing stock and in particular where insulation is not as effective as it should be. Working with colleagues in the UK we have now developed several innovative approaches to remedy these issues. These methodologies are now tried and tested and fully accredited by the British Board of Agreement, who are responsible for the regulation of the Insulation Industry.

With regard to the specific questions in the consultation, we would answer as follows:

Question 1. "Respondents are asked to provide any evidence that they have in relation to the impact that the proposals in this paper will have on the groups listed above in relation to Section 75 of the Northern Ireland Act."

The House Condition Survey mentioned above, assessed Fuel Poverty at 42% making Northern Ireland one of the worst in Europe and significantly worse than the rest of the UK. Whilst the survey is flawed it is unlikely this number is overstated.

NISEP has contributed towards limiting the effects of Fuel Poverty over recent years with 80% of the funding ring-fenced for vulnerable domestic customers. It is therefore essential that this funding remains in place until an alternative scheme is fully in situ. By proposing to reallocate 80% of the costs of funding to domestic customers this decision is likely to disproportionately impact the extreme fuel poor who tend to inhabit very energy inefficient homes and are often housebound.

Question 2. “Respondents are asked to provide any further comments on the impact that the proposals in this paper are likely to have in relation to the promotion of equality of opportunity and the promotion of good relations.”

No Further comment.

Question 3. “Respondents are asked to comment on the proposal to extend NISEP on the basis of 80% to domestic customers and 20% to non-domestic customers. Respondents are asked where possible to include any evidence that they might have to support their responses.”

Without the current NISEP scheme the Insulation Industry would have suffered further significant job losses. The consultation paper mentions various alternative schemes but the only scheme which is certain of funding is the Affordable Warmth Scheme which has replaced Warm Homes and the transition from one scheme to another has been handled extremely poorly from the perspective of continuity of work for contractors.

The paper mentions Project Heat but this scheme has been in the making for over two years and very little information is available publicly and as the Industry Body we must express our disappointment over how little engagement has taken place with the people that actually carry out the work!

For several years now a new Energy Bill has been expected which was due to include an Energy Efficiency Obligation (EEO). The Industry was very disappointed at the decision to postpone this past 2016 with no revised timetable set.

Affordable Warmth on its own will have very little impact on the energy efficiency of our Housing Stock and our damning Fuel Poverty Statistics. It is critical that NISEP stays in place until some something is put in its place and until this scheme is fully operational ie it has moved beyond pilot stage.

If NISEP is to continue beyond 2017 in some shape or form we would be happy to cooperate in its redesign. The administrative aspects are protracted and expensive due to the need to effectively re-tender each and year and also with the number of schemes involved.

In closing we would like to thank the Regulator for the much needed support the NISEP Programme has brought to the Industry in very difficult times and to the Energy Savings Trust for their help in ensuring the Schemes’ success

Yours Sincerely,

Bill McCandless

On Behalf of the National Insulation Association (NI)

