



Glass and Glazing Federation

18 January 2012.

Mr G Barker MP
Minister of State DECC
House of Commons
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Dear Minister

Following the publication of DECC's "The Green Deal and Energy Company Obligation" consultation; the following Fenestration Industry Trade Associations and operators have met to discuss their opinions on this proposed scheme:

Glass and Glazing Federation; Flat Glass Manufacturers Association; British Plastics Federation; British Woodworking Federation; Council for Aluminum in Buildings; Steel Window Association; National Federation of Glaziers; Association of Composite Door Manufacturers; FENSA; Network Veka; British Glass Manufacturers' Confederation.

Each Trade Association may submit their own submission to the consultation, however we have general consensus on the following key points regarding the consultation and the impact on this industry sector:

- We all welcome the Government's initiative to help improve the thermal performance of the existing building stock within the UK, and the recognition of the contribution energy efficient windows and doors will contribute to reducing carbon emissions.
- We also support the requirement for determining the competency of the workforce for Green Deal.
- We do have concerns that the reduced data SAP software to be used by the Assessor does not accurately reflect the true energy savings made by replacing windows. We are worried that the recognition of the thermal properties of the existing window (if not single glazed) is not accurately determined and the benefits of solar gain (included within Building Regulations with Window Energy Ratings) is not included. This will reduce the financial and energy savings over the life time of the product and have major implications for energy efficient windows and doors with meeting the Golden Rule. In addition, for the floor area of a property being assessed, the default window area is assumed. This will not accurately determine the energy savings from replacing windows and doors if the calculation is not based on factual information.

- We welcome the use of ECO for solid wall insulation; however, we would like to remind you that whenever the installation of solid wall insulation is undertaken the interface with windows and doors needs to be replaced to prevent cold bridging or potential water ingress to the fabric of the building. If the fenestration products are to be removed and refitted, this would be a suitable time to replace and upgrade the measure – windows and doors should logically be included as a package with solid wall insulation under ECO.
- Heat loss from windows and doors may be as high as 25% of that from the building. With regard to the Golden Rule the cost of replacement windows and doors places these measures in the same financial bracket as Solid Wall Insulation. In principle then should not windows and doors be subject to ECO eligibility?
- We do have fears that the Green Deal could significantly change the established supply chain and market balance which includes national companies, large and small regional companies as well as micro enterprises. This could have a significant impact on the number of companies and staff employed by them in the future. In particular the W&D industry is successful and characterized by the competition engendered with literally thousands of installers competing for consumer and commercial premises' business. Any result that limited this natural competition through a select number of "National Players" would be bad for consumers and bad for this industry.
- We do have concerns that the Green Deal scheme is very bureaucratic; in its application window and door replacement may not be included in the actual measures taken due to the requirement for a top up payment imposed by the Golden Rule. The problem being that the large implied costs incurred by GDP's will dilute the savings available from the industry's products.
- The additional administrative procedures required under the Green Deal will result in the customer paying more for their products than when buying them directly from a replacement window company - this is an inadvertent deterrent within the system for the consumer to purchase under Green Deal.
- There are a number of aspects of the "Golden Rule" that appear to be flawed, at least as currently described within the consultation document. In particular it is not commercially realistic to expect insurers to provide IBG's for periods of 25 years, or more, anymore than it is realistic to expect installers and/or GDP's to provide product performance warranties for such periods. Our industry is unanimous in proposing that its current practice of providing very generous 10 year warranties on installed products should not and in fact, cannot be exceeded.
- We are also extremely worried about the potential impact of the time lag between now and the Green Deal being launched in October; consumers may hold back from purchasing products until the Green Deal is launched. This will further damage this industry which continues to be impacted by the recession. We therefore request the



Government keep this initiative low key with regard to the consumer until just prior to the launch in October.

To simplify the scheme and to not exclude any business (as long as suitably certified) we would like to make the following proposal:

The Assessor undertakes their survey and produces a report for the measures that could be updated and improved. For windows and doors this would show the energy saving and financial savings over 10 years (this would tie in with the existing warranty and insurance backed guarantees which are virtually standard across the replacement window and door industry). This financial saving less any Green Deal Provider administration fee would be used to generate a voucher for replacement windows and doors, which could then be redeemed from a Green Deal Approved Installer. The voucher would detail the number and location of the windows and doors (if the whole house is not to be upgraded) and specification to ensure the calculated energy savings from the survey are met. This approach would mean that all the other benefits for which a consumer wishes to replace windows and doors e.g. increased security, reduced maintenance, improved acoustics, improved architectural look, better ventilation etc. could be passed through to the building owner. It should also be recognized that there is a large range of consumer choice for replacement windows and doors (unlike most of the other measures within the Green Deal. These include: type of material (timber, PVC-U, aluminum, steel, composite), style of window (vertical slider, tilt - turn, casement, fixed light), colour of product, glazing options, hardware options. These options need to be discussed between the installer and the building owner to prevent the imposition of a "standard" Green Deal window which the consumer would not want fitted. The voucher can be taken to any Green Deal approved installer to get the work undertaken. The voucher would be redeemed from the Provider for payment on completion of the works.

We hope that our suggestions and concerns will be seriously taken into consideration; we would be more than pleased to discuss any of these issues in more detail with either yourself or your officials to ensure the success of the Green Deal.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nigel Rees', is written over a horizontal blue line.

Nigel Rees
Chief Executive
Glass and Glazing Federation.