

# **EUA response to Building Regulations Part L and F Review – Stage 2A**

## **About us**

The Energy and Utilities Alliance (EUA) provides a leading industry voice helping shape the future policy direction within the sector. Using its wealth of expertise and over 100 years of experience, it acts to further the best interests of its members and the wider community in working towards a sustainable, energy secure and efficient future. EUA has seven organisational divisions - Utility Networks (UN), the Heating and Hotwater Industry Council (HHIC), the Industrial & Commercial Energy Association (ICOM), the Hot Water Association (HWA), the Manufacturers' Association of Radiators and Convectors (MARC), the Gas Vehicle Network (GV Network) and the Manufacturers of Equipment for Heat Networks Association (MEHNA)

EUA represents all the main heating manufacturers in the UK along with the majority of major installation companies, training providers and component manufacturers. Approximately 98% of heating measures installed in UK homes comes from an EUA member.

The Energy and Utilities Alliance (EUA) is a company limited by guarantee and registered in England. Company number: 10461234, VAT number: 254 3805 07, registered address: Camden House, 201 Warwick Road, Kenilworth, Warwickshire, CV8 1TH.

## **Response**

**Do you agree with the introduction of 'Boiler Plus' in Section 6?**

HHIC agrees.

HHIC however believes that the Welsh Government should look to extend Boiler Plus to all boilers installed and not just combination boilers. This would ensure all new gas boiler installed are able to maximise their system efficiency, i.e. by requiring smart/compensating controls, or other suitable "options", to be installed in tandem.

HHIC would comment that there are mixed views amongst our members on the definition of load compensation used in the consultation, which differs from the English policy. Some see it as clarification of BEIS' original policy intent, others that it is restrictive, and could create a cross-border barrier to trade, i.e. there is a concern that products sold in England as "Part L compliant" may not be able to be in Wales. However, there is a consensus view that Boiler Plus policy implementation in England has "worked", and led both to compliance and the energy savings envisaged, which are of course continual, as boilers are replaced.

**Do you agree with the minimum standards for building services in Sections 5 and 6?**

HHIC agrees

**Do you agree with the proposal that when a space heating system is installed or replaced in an existing home, the system should be sized to allow the space heating system to operate at a flow temperature of 55°C or lower where feasible in Section 5?**

We believe that the statement should be '.....to operate at a max flow temperature of 55C or radiator mean water temperature (MWT) of 50C whichever is most suitable for the heat generator to be used, and where economically feasible.'

**Do you agree with the proposed approach for Self-Regulated Devices as in Section 5?**

HHIC agrees

**Do you propose any other future-proofing measure(s)**

HHIC believes that hydronic balancing should also be considered as a recommended measure for new and replacement heating systems. Ensuring that the system is correctly balanced will help make sure that the system is operating at an optimum efficiency level and this can also help reduce consumers energy bills.