



EVIDENCE TO THE ALL PARTY PARLIAMENTARY GROUP FOR EXCELLENCE IN THE BUILT ENVIRONMENT

Presented by the UK Expanded Polystyrene Industry represented by the EPS Group of the British Plastics Federation

Background - The Weight of Our Evidence

In providing this evidence to the APPG for Excellence in the Built Environment, we would reiterate our significant role in the provision of innovative, energy-efficient, carbon-saving products for the UK construction industry. We represent 80% of the expanded polystyrene manufacturing industry in the UK. EPS is a major polymer production sector which is part of a £13 billion UK plastics processing industry. This industry achieves exports of around £5 billion in support of the UK economy. It employs 186,000 people across more than 7,000 companies in Britain. In the last fifty years, plastics have enabled the transformation of the global building and construction sector through their high-performance, economic and energy-saving solutions from double glazing, ducting and drainage products to cladding, cabling and cavity wall insulation. All of these products already fully comply with all legislative and regulatory criteria and performance standards.

1: Best Practice of Sustainable Construction in the Built Environment - how could this be repeated?

The EPS industry has been a constant innovator in sustainable construction. Our products provide enhanced energy-saving performance whilst themselves demanding minimal manufacturing and transportation impacts.

The versatility of EPS, in bead, board form, and increasingly in moulded shapes for construction applications, represents an ideal and proven solution to solid and cavity wall insulation as well as for roofing and flooring applications

We fully support the principles adopted by Government in its 'Green Deal' and ECO strategies. We have serious concerns in particular, about the failure, under current plans, to recognise the pre-existing performance capabilities and future potential contribution offered by EPS towards improving the effectiveness of cavity wall insulation and hence achieving 'Golden Rule' targets.

The in-use factors currently proposed are based on historic surveys (and traditional products) and are a punitive 35% for cavity wall insulation.

Innovation by the raw material manufacturers has resulted in a 20% improvement in thermal values of Grey EPS Bead compared to alternative products.

BRE has conducted large scale tests on several BBA certificate holders' products using Grey EPS bead systems. These demonstrated an improvement beyond the 50% attributed theoretical performance of mineral fibre to 75% for EPS Bead and with the resulting improvement in energy saving.

These results were approved and applied by Ofgem.

In addition EPS cwi systems have demonstrated their performance in terms of rain penetration in tests at the BBA with cavities as low as 40mm and can therefore be part of the solution for "hard to treat cavities".

2: Barriers to Sustainable Construction - what is holding the industry back?

The failure to continue recognition of the significant, demonstrable and independently verified attributes of EPS cavity wall insulation from January 2013, represents a clear barrier to the delivery of ECO and the Green Deal 'Golden Rule'. We therefore urge that our long-established and externally assessed product performance data be included in the calculation model for the 'Golden Rule'.

In addition, the 'Green Deal' scheme has so far failed to provide a mechanism or pathway by which the EPS industry may rightfully appeal for the inclusion of its third-party verified performance data in the calculation model as a means of reducing the 'in-use' factor. This means we are being deprived of a fair route to establishing our provable performance credentials or avoiding our products being disadvantaged both commercially and reputationally by the use of unsupportable 'in-use' penalties which are not relevant to EPS.

We are very concerned that any proposals to establish a transparent mechanism to confirm what has already been demonstrated will be a slow process and cause material damage to our industry while at the same time reduce the effectiveness of this aspect of The Green Deal.

By restricting companies ability to demonstrate the savings achieved under previous Government schemes, 'Green Deal' is effectively ignoring 'industry best practice' for product performance data and, at the same time, acting as a damper to market opportunity and a restriction on trade.

3: Progress on Sustainable Homes - too much, too fast?

The move towards providing sustainable homes at an affordable price cannot be fast enough. But Government's 'Green Deal' is missing an opportunity to improve the carbon footprint of existing homes by failing to acknowledge the significant potential for EPS to provide a fast, reliable, viable, affordable and proven solution for cavity wall insulation.

Any delay in accepting and incorporating known EPS product differentiation evidence (widely available in construction industry/specifier databases) - coupled with the use of inappropriate 'in-use' factors against EPS - not only acts as a barrier to competition and choice (as most recently defined by the Office of Fair Trading Report into Home Insulation) but seriously jeopardises the potential and potency of the Government's 'Green Deal' scheme. It is clearly inappropriate to suggest that EPS insulation experiences failure or risk rates as high as those factored in for other materials and it is unfair to put our industry under constant pressure to re-test and re-validate its products unnecessarily.

4: The Green Deal - is the policy the right one?

As we have stated, our industry supports the principles of the 'Green Deal' but has strong reservations about the failure to acknowledge that the wide range of construction products used to achieve better sustainability are many and complex. It is important that Government urgently accepts the need for existing product differentiation data, supported by independent third-party validation. It should also actively promote such information to the construction sector and wider public as part of the 'Green Deal'. This would become a positive route to providing choice and transparency for 'Green Deal' in line with Government's declared policies.

In conclusion, we believe that, in the current 'Green Deal' framework, we are being unfairly disadvantaged by the failure to accept our proven performance data and, of equal importance, that the aims and achievements of 'Green Deal' in carbon saving will be slower and less effective unless and until this serious shortcoming is corrected.

Submitted on behalf of BPF EPS members including:

Domestic & General Insulation
DSSmith Plastic Foam Products
Energystore
Insta Group
Moulded Foams
Springvale EPS
Vita Cellular Foams
Warmfill