

**Submission deadline: 6 August 2019**  
**Submission to: [beisecoteam@beis.gov.uk](mailto:beisecoteam@beis.gov.uk)**

## About BESA

The Building Engineering Services Association (BESA) is the **UK's leading trade organisation for building engineering services contractors** – representing the interests of firms active in the design, installation, commissioning, maintenance, control and management of engineering systems and services in buildings. We have more than 1,000 members with a combined estimated turnover of £3.6 billion; BESA's members operate through the whole process from design of a building through construction, occupation, refurbishment and, ultimately, decommissioning.

## Our submission

BESA has chosen to only answer questions 1 and 2.

- 1. Do you agree with the proposal for the incorporation of TrustMark into ECO3 and, in particular, for installers to have to be TrustMark registered businesses to deliver eligible ECO3 measures, with the exception of Demonstration Actions and certain District Heating Systems (DHS) measures? In particular, do you agree that the increased financial protection requirements under the TrustMark Framework should apply in respect of ECO energy efficiency measures (except demonstration actions and certain DHS measures)?**

Yes. In principal, BESA supports the ECO3 scheme incorporating TrustMark, (in the form of the TrustMark Government Endorsed Quality scheme), in addition for businesses eligible to deliver ECO3 measures to be TrustMark registered.

It is important that ECO3 measures are installed by competent traders within well-run firms; it is a Government-organised scheme and having the work undertaken by such firms makes sense for the wider 'green' agenda in gaining public trust and support.

But equally, it is important for TrustMark to be sensibly implemented. ECO work is normally only a small part of installers' revenues. Reputable traders will already have gone through a technical and company standing competency process (which covers much the same technical and company standing requirements). Clearly the additional TrustMark criteria need to be capable of being delivered by other competent person scheme / certification providers, as currently happens with TrustMark's current / initial certification mark.

As part of this, the implementation of TrustMark and the additional notification of measures of installed works lodged in the TrustMark Data Warehouse should not undermine existing certification schemes such as competent person schemes (under MHCLG's oversight), where data is already being lodged and transferred to relevant Government departments.

This is because the introduction of more complexity for data collection and transfer will undermine existing certification schemes and TrustMark will need to work with industry to ensure no additional cost or repetition of data collection, reporting and recording is taking place via other approved government schemes.

Ultimately, if installers regard the additional TrustMark authorisation to be costly or difficult to achieve, fewer installers will participate in ECO. This will inevitably push the cost of delivering ECO measures up, particularly for those outside the big 6 energy supply companies, who tend to sub-contract more due to being leaner operating models.

**2. Do you agree that incorporation of TrustMark into ECO3 is sufficient to demonstrate certification and compliance with the appropriate PAS standards?**

Yes. Certification and compliance with the appropriate PAS standards are achieved through the TrustMark approved competent person scheme providers. This should continue to be the approach and BESA would recommend the scheme providers be accredited to BSEN17065 to ensure consistency of standards when applicants are assessed. This ensures PAS criteria is met.

