

Our Ref: BM181016



18th October 2016

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Dear

RE: BBA Certification of External Wall Insulation

Further to my letter of 7th October 2016 regarding the above.

We have now had the opportunity to discuss with a number of our Clients the issues which they have raised with us, and I thought it would be helpful to provide an update in a 'FAQ' format so that we are all accessing the same information

Q1 Should this windload calculations' review not already be covered in existing Certificates?

A1 The BBA follows a principle that Certificates provide the necessary information to enable a suitably experienced and qualified individual to carry out the structural calculations on a case by case basis. The BBA established the data based on tests and provides guidance to be used when considering the wind load calculations and assessment of pull out and pull through of the fixings with their correspondent safety factors (see section 4 "Design Considerations" and 7 of Certificates). The BBA was therefore relying on Certificate holders, system designers and structural engineers to follow the standard methodology and knowledge of the system, together with the data given in Certificates to apply to and interpret in the results of their calculations.

In the cases of concern so far identified, had the requirements set out in our Certificates been met, then these unfortunate incidents, which have the potential to jeopardise the reputation of products and installers alike, would not have occurred.

Q2 Why haven't BBA picked this up before?

A2 The BBA would have expected that in the event of a significant failure of the system or the installation, either the Certificate's holder or the installer would have informed the BBA of the failure immediately. These failures have been reported by the end users and not by the Certificate holders and has required us to undertake investigations to understand the problem and implement a solution.

Once we were aware of the February 2016 failures, we immediately wrote to clients and installers inviting them to inform us of any other failures that they were aware of. Receiving no responses, we needed to satisfy ourselves that there were no similar systems installations problems which could put the public at risk and so we began our enquiries. I'm sure you will agree that it is vital we are informed of failures for the reasons we have set out in this update.

Product Approval

Installer Approval

Test Services

Management Systems

Q3 Charging to do this is inappropriate given money paid for certificates.

A3 The type of catastrophic failure which came to our attention, coupled with the attendant ramifications for public safety and the reputation of a rapidly growing sector, demanded a major response from the BBA. Since February 2016, the BBA has met the costs associated with hundreds of hours of expert-led investigation to determine the probable causes of the failure.

If, as we believe, there may be a wider problem, we expect that many more hours will be required. Whilst we regret any additional costs in these commercially challenging times, having borne the costs to this point, we are unable to continue to do so given the scale and nature of the work involved.

Q4 Threatening withdrawal of Certificates if Clients don't co-operate is very bad.

A4 The impact of this type of failure on the reputation of the sector and public confidence is significant. Indeed, the sector and its representatives would be highly criticised if there had been no substantial response. To stand up and back the sector, BBA has to be confident that we know that every Certificate holder is doing what is necessary to protect the interests of the public. Under these conditions, I hope it is understood that exceptions cannot be accommodated. Equally, that we stand by our approach that each and every Certificate holder will receive the same information in the same way.

Q5 There was a lack of consultation pre-letter (7th October 2016).

A5 This is an issue of enormous commercial sensitivity for those involved to this point who have every right to expect confidentiality. That said, BBA - through its network of technical contacts - has engaged with a significant number of companies to help form and inform our view of the scale of the problem.

Q6 This should be covered in the original system testing and certification.

A6 Please see my response to Q1 above.

Q7 Wind loading should be checked as part of BBAs annual audits - so why is this extra checking needed?

A7 Windload calculations have not been checked as part of annual audits to this point. Given that serious failures have occurred, I am sure that you would agree that it is entirely proper that immediate steps are taken to identify any further problems.

Q8 This relates to system certification and ongoing audit, so if BBA has concerns that it has not addressed this matter previously they should cover the cost of checking - not the system designer?

A8 As stated in Q1/A1 above, if all Clients adhered to our Certification requirements then it is unlikely that a failure would have arisen. It is regrettable but our investigations thus far suggest that some Clients have proceeded with wind-load calculations which are incorrect. Also, some calculations have been provided by third parties perhaps suggesting that some suppliers may not have the internal technical expertise available to verify these calculations. Where this occurs, some companies may believe that they are complying with their Certification requirements when they are not.

The lack of expertise in this area will be a concern and the BBA will be hosting a technical conference at which all our system suppliers will be invited to address some of the technical challenges that the industry is currently facing.

It is regrettable that these checks are necessary but we believe that our actions would be considered to be reasonable by the public and their representatives in the event of another significant failure.

Q9 It's another CASS.

A9 The Cavity Assessor Surveillance Scheme was introduced in direct response to concerns raised by the insurance industry and policy makers that cavity wall insulation installations were being carried out on unsuitable properties. CASS is designed to improve public confidence and protect the reputation of responsible installers. Our hope is that industry Associations back these measures designed to protect the interests of their members.

Q10 Why wasn't this raised by BBA at the NIA conference (5th October 2016)?

A10 Our brief for that event was '*what's happening at the BBA*' in the strategic framework of quality and standards. There are a myriad of tactical issues that occur every day, some of which can be summarised in a PowerPoint bullet but some should not be. We feel that this issue was not suitable for communication via that medium.

Q11 Why can't an industry Association act as a collective to discuss the overall proposal as opposed to individual company issues?

A11 BBA's contractual position in respect of existing Certificates is with individual companies, not with the industry Associations. Also, there will be many permutations of situations for individual Clients which we are not sure can be effectively dealt with centrally. Further, there are a number of Associations with a range of remits and it may not be wise to use an Association-centred approach to achieve resolution of this significant operational issue. However, we have corresponded and spoken separately with the Associations with whom we are meeting to discuss this matter shortly.

In conclusion, may I also take this opportunity to thank our Clients for their prompt, supportive and engaged responses on this difficult matter which we will have resolved as soon as possible. If there are further issues or queries that you wish to raise with us, please feel free to do so.

Please remember the date for windload calculation submissions that we are all working to is Friday 2nd December 2016.

Yours sincerely



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