

**Written evidence submitted by the Mineral Wool Insulation Manufacturers Association (MIMA)
(RFH0054)**

Introduction

The Mineral Wool Insulation Manufacturers' Association (MIMA) is a trade body providing an authoritative source of independent information and advice on non-combustible glass and stone wool insulation. We represent leading mineral wool insulation companies in the UK, promoting the benefits of mineral wool insulation and the contribution it makes to the energy efficiency of buildings and the comfort, health and safety of their occupants.

MIMA has a long-standing record of conducting research, advocating for policy, and developing high-performing mineral wool insulation systems which support the retrofit industry in closing gaps in performance between the design intent of energy efficiency measures and their actual performance in use.

As a member of the EEIG, a coalition of leading industry and trade bodies, businesses, including manufacturers, installers and other organisations representing the energy efficiency and decarbonisation supply chain, we echo the EEIG's concerns with regards to the recent suspension of 39 businesses due to poor-quality solid wall insulation installations.

Whilst there are many responsible installers who upgrade and improve homes under government schemes such as ECO or GBIS, we remain fully supportive of a robust compliance and oversight process for retrofit. As an industry we must address any failures that undermine confidence in these government energy efficiency or clean heat schemes but also which may undermine consumer confidence in the vital retrofitting or upgrading of homes across the UK.

MIMA's short response focuses on the second Committee session on "*how best to reshape industry regulation and ensure Government targets are now safely met*" and the positive part that strengthening the link between retrofit measures with actual performance outcomes plays to deliver consumer trust and confidence and subsequently become a crucial component of the government's Warm Homes Plan.

This week, MIMA has published a report "[*Making Performance-Led Retrofit a Reality*](#)"¹ setting out seven recommendations for UK policy and industry standards, geared towards building strong consumer trust and confidence in home retrofit as we transition to Net Zero. It also discusses insulation's important role within our framework and within the context of the electrification of home heating.

Giving Consumer's Assurances in the home retrofit journey:

To 'take people with us' on this transition, the insulation, energy efficiency, and clean heat sectors need to work closely together to ensure we achieve reliably good, proven outcomes for customers when retrofitting their homes.

If we, as an industry, can commit to checking, verifying, and increasingly guaranteeing aspects of building performance as the housing stock is decarbonised, we take many of the real or perceived risks of the transition off the shoulders of householders and onto ourselves. We can better assure customers

¹ See full report, summary and recommendations at www.mima.info

of a positive retrofit experience and a great outcome, ensuring the energy savings and emissions reductions aimed for are realised, and people's homes are comfortable, healthy, and safe to live in.

To achieve these goals, MIMA is calling for policy and standards to evolve so that **by 2030**:

- **Measuring key aspects of home energy performance has become the norm.** Underpinned by three 'Ms': measurement, metering, and monitoring of home energy performance, all UK households getting a home fabric and/or clean heat upgrade should be able to opt for a service from their Retrofit Provider which includes checks of the actual performance of the fabric and clean heating system, pre- and/or post retrofit as appropriate, using accredited methods, technologies, and forms of monitoring.
- **An ever-growing number of households can benefit from 'Outcomes-Based Guarantees'.** Fabric upgrades and clean heating systems working together in homes, alongside widespread and routine checks of their in-use performance, will enable and encourage more Retrofit Providers to innovate with market offerings we are calling Outcomes-Based Guarantees. These are optional contracts with customers whose terms assure or guarantee certain outcomes from a home upgrade, such as a specified, minimum heating system efficiency or agreed energy saving in kWh.

This approach to delivery is based on a simple set of guiding principles:



MIMA's vision:

MIMA's vision is for every household getting their home's fabric or heating system upgraded to be offered a form of Outcomes-Based Guarantee from their Retrofit Provider. An assurance and proof the retrofit work "does what it says on the tin."

Fortunately, we are now in an era where an increasing number of relatively low-cost, low disruption technologies and methods exist to measure how homes perform in terms of their heat demand, energy use, and emissions. Making such testing routine not only drives the development of new Outcomes-Based Guarantees but means Retrofit Providers and their customers no longer need to rely solely on modelled performance estimates which can differ significantly to measured results.

For instance, it is now possible to measure the heat loss of a building relatively rapidly without the occupants having to move out, using Smart Meter Enabled Thermal Efficiency Ratings (SMETER)

technologies. It is also possible to have a heat meter installed with a heat pump to allow its real-time and average yearly efficiency to be checked, interfacing easily with a homeowner's smart phone or tablet.

Such technologies open the door to all kinds of exciting Outcomes-Based Guarantees. For example:

- Heat Geek already guarantees the “overall efficiency” of the heat pump systems fitted by their engineers.²
- Knauf Energy Solutions recently guaranteed an agreed level of energy demand saving in kWh (assessed under standardised conditions) for a social housing retrofit project of 166 homes in Belgium.³
- Octopus Energy offers the “Octopus Zero Bills” guarantee for new build homes, which may, down the line extend to any home which meets their specification.⁴

Guaranteeing heating bill savings

By routinely checking the actual, in use performance a home fabric upgrades and heat pump system efficiency we support Retrofit Providers in coming forward with pledges or guarantees to ‘meet or beat’ the running costs of a household's previous fossil fuel heating system, guaranteeing bill savings, and helping to de-risk delivery.

“There is broad consensus and support for this clean energy transition...We have to make this work financially for people. That is the absolute pre-condition of taking people with us...Think about heat pumps...take up is up...but this only works if we can say to people, you can replace your boiler with a heat pump, and it won't cost you more. If we're saying to people we're going to come along and charge you £1,000s extra we're just not going to take people with us on the transition. That is my strong view...That is why our Warm Homes Plan is important.” *Rt Hon Ed Miliband MP, Secretary of State for Energy Security and Net Zero, 15 January 2025*⁵

Being able to reassure, guarantee, and prove to a homeowner that they will get a good retrofit experience with a positive outcome is a game-changer, and naturally generates consumer trust and confidence in the process. It also delivers important benefits for the country as a whole:

- **Guaranteed heating bill savings for consumers.** Guarantees, for instance, “that bills will not rise” when switching to a clean heating system means householders can feel confident they will realise this result.
- **Guaranteed improvements in housing conditions and health outcomes.** Good insulation, working as intended, can make a home healthier and safer. Guaranteeing energy savings and/or ‘comfort’, for example, ensures fuel poor households and those living in sub-standard housing get genuine, verified improvements.
- **Guaranteed energy demand savings.** Verification of actual heat demand reductions, made one property at a time, adds up to improved energy security.

And for the retrofit industry more generally, if we routinely check aspects of home energy performance and begin to guarantee our installations ‘do what they say on the tin’, this will have many business and reputational benefits.

MIMA is calling for such outcomes-focused targets and policies to be woven into the very fabric of the Warm Homes Plan, helping to de-risk the journey to low energy, low emissions homes, for the

² See [Homeowner Agreement](#)

³ See [CaseStudies \(All\) | KES Site](#)

⁴ See [Making Zero Bill homes the new normal | Octopus Energy | Octopus Energy](#)

⁵ See [\(10\) Post | LinkedIn](#)

consumer and for the Government.

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