

Wednesday 29 May 2024

Open Letter

Sarah Albon  
Chief Executive  
Health & Safety Executive (HSE)

By email: [sarah.albon@hse.gov.uk](mailto:sarah.albon@hse.gov.uk)

Dear Ms Albon,

I am writing further to the issue of the HSE document [\*Moisture risk of spray foam insulation applied to timber sloped roofs\*](#) and the two related letters issued subsequently.

[\*Ofgem data in 2014\*](#) showed that up to 10% of retrofit projects were defective and [a 2017 study](#) by Constructing Excellence in Wales, highlighted the unintended consequences of poorly installed retrofit, which can make living conditions worse and lead to an increase in mould and damp problems. Our anecdotal evidence suggests that this problem has not gone away and this is further highlighted in a [BBC article](#) which was published today.

As a result of this, in 2023, the Property Care Association in conjunction with several other bodies issued the [\*Sprayed Foam Insulation Inspection Protocol\*](#). The document is clear about the process that should be taken when evaluating the existing installation of spray foam.

The results from the HSE's modelling is clear: there can be risks using spray foam where the application is not well considered pre-application and does not follow the guidance set out in [BS 5250:2021 Management of moisture in buildings. Code of practice](#).

As the trade association which represents amongst other sectors, damp, timber and residential ventilation specialists, we are acutely aware of the unintended consequences which can occur if the protocol is not followed.

The evidence and media coverage of unsuccessful retrofit projects has led, in many cases, to a lack of consumer confidence in the products already installed in homes, or unwillingness to install insulation due to concern raised in such coverage. Over the coming months, we will be working with other sector bodies to ensure consumers do not panic, leading to decision-making which could adversely affect their property without the proper advice and information. Government needs to support this message and encourage homeowners to work with trained, experienced professionals to access guidance when installing new, or reviewing existing retrofit.

As the government strives to meet its net zero targets, we must carefully manage the retrofitting of the nation's 26 million homes to ensure, this is carried out with each individual residence in mind. Clear communications must be produced to provide homeowners with the information they need to make suitable decisions for their home and incentives must be available to ensure contractors undertake the right, industry-agreed training (which should include training on the impacts of poor installation) before being able to install retrofit using government funding.

We would be delighted to discuss these issues with you further.

Yours sincerely



**Sarah Garry**  
**Chief Executive**

*Cc. Philip White, Director of Building Safety*