

The Future of the Energy Company Obligation

Community Housing Cymru Group response

1. About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 155,000 homes and related housing services across Wales. In 2012/13, our members directly employed 8,000 people and spent over £1bn in the Welsh economy. Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

Our vision is to be:

- A dynamic, action-based advocate for the not-for-profit housing sector.
- A 'member centred' support provider, adding value to our members' activities by delivering the services and advice that they need in order to provide social housing, regeneration and care services.
- A knowledge-based social enterprise.

In 2010, CHC formed a group structure with Care & Repair Cymru and CREW Regeneration Wales in order to jointly champion not-for-profit housing, care and regeneration.

Care & Repair Cymru (C&RC) are the “Older People’s Housing Champion”. We are a national charitable body and actively work to ensure that all older people have homes that are safe, secure and appropriate to their needs.

Care & Repair Cymru is committed to improving the health & wellbeing of older people in Wales by providing advice and assistance with home improvements, adaptations and general repairs.

We work in partnership with a number of organisations including the Welsh and local Governments and the Welsh NHS. We also work with third sector organisations and HAs to ensure that older people have access to a range of housing and social solutions that enable them to live in housing that meets their individual needs.

There are 22 Care & Repair Agencies covering the whole of Wales. Each agency provides a wide range of services and support for older and vulnerable people, helping them to remain living independently in their own homes and communities.

Summary of Community Housing Cymru Group’s consultation response

The Community Housing Cymru Group (CHC) is disappointed and concerned about the changes being considered in the consultation to ECO, the UK Government’s main energy efficiency programme. CHC is particularly concerned with the proposed cuts to its main programme, CERO (Carbon Emissions Reduction Obligation), and proposals to reduce its SWI target for 2017 to only 100,000 properties.

The 100,000 SWI target is very unambitious considering the high level of households living in hard to treat homes and in fuel poverty across the UK. The cut to the SWI target is particularly disappointing as HAs across Wales were reliant on using ECO to treat their hard to treat properties.

To ensure that all regions across the UK are treated fairly, CHC believes that DECC should consider putting a regional target or quota on the number of solid wall properties an energy supplier must target, especially as the target for installing solid wall insulation will be severely cut.

CHC believes that DECC should also consider lowering the target for SWI 2015 and then increasing the SWI target thereafter to 2017.

CHC and its members are concerned that having loft and cavity wall insulation as a primary measure goes against what ECO was designed to target and do. Adding low cost measures such as loft and CWI hinders progress in alleviating fuel poverty and treating hard to treat homes in Wales.

Tenants and homeowners in Wales already in fuel poverty and economic hardship will suffer further due to the changes to ECO. As a consequence to these changes, more tenants across Wales will remain in fuel poverty and live in hard to treat homes. The UK and Welsh Governments will also miss their carbon reduction and energy efficiency targets.

Housing associations across the UK need the UK Government to deliver a consistent energy efficiency policy. We call on the UK Government to maintain ECO funding and their investment in energy efficiency.

CHC is responding to the questions in the consultation which are most pertinent to HAs and the sector in Wales.

15 April 2014

Question 1: Do you agree that the 2015 CERO target should be reduced by 33 per cent from 20.9mtCO₂ to 14mtCO₂?

CHC understands the background behind the Department of Climate Change's (DECC) decision to reduce the 2015 CERO by 33 per cent. However, CHC believes that the changes are excessive. As an impact of these big cuts to targets, more homeowners and tenants will remain in fuel poverty and in energy inefficient, hard to treat homes.

There is concern that as a consequence of the changes to ECO and, in particular, CERO, Wales will fare proportionately worse than other regions in the UK. Already in Wales, housing associations have had to deal with uncertainty over their prospective ECO schemes due to energy companies' delays as a consequence of UK Government ECO changes.

A number of our members across Wales have stated that energy companies, as a consequence of government decisions, delayed and stopped negotiating on ECO

whilst waiting for changes to ECO to be implemented, with some even changing their ECO commitments and agreements.

Due to the uncertainty over ECO, CEROs reduction and changes to the SWI target, HAs' ability to plan their energy efficiency and maintenance programme of works for 2014/15 has been affected. HAs haven't been able to plan ahead as they are uncertain over whether they can obtain ECO funding in the future and, if so, how much funding can be secured to improve their Solid Wall Insulation (SWI) and hard to treat properties.

There is a concern that energy suppliers and companies may choose as a result of the ECO changes to target easier English ECO regions rather than Wales to meet its CERO and other programme targets. According to the latest DECC statistics, a provisional 528,886 measures had been installed under ECO; however, only six per cent were in Wales (31,809).

Before the ECO consultation was announced, Wales already had a lower percentage of measures installed per 1,000 households compared to its English and Scottish counterparts with only 24 ECO measures installed per 1,000 households in Wales.

There is a danger that without stringent guidelines from DECC, energy companies may go for the easy projects and ignore the harder to treat and smaller number of solid wall schemes in Wales.

There is evidence that energy companies target only top rated schemes (i.e. the most carbon savings) and high density (over 500 properties) numbers, sidestepping good HA led schemes in Wales with smaller density of properties and fewer carbon savings for other larger profitable schemes.

DECC should consider putting a regional target or quota on the number of solid wall properties an energy supplier must target and meet to ensure that all regions across the UK are treated fairly, especially as the target for installing solid wall insulation will be severely cut.

Question 2: Should the new 2015 CERO target be applied to Phases 1, 2 and 3, or to Phase 3 only?

There are benefits for evenly distributing the CERO target across all three phases. DECC can set minimum targets for energy suppliers to deliver and HAs and the independent supply chain have an idea of the number of properties the energy suppliers can target for a particular phase and plan accordingly.

However, having said that, applying the new 2015 target to phase 3 only can be seen as only really benefiting the energy companies.

HAs across Wales require highly skilled building and maintenance teams and well trained local contractors to help build and maintain their housing stock. Tinkering with the phases puts an uncertainty on the construction industry, its solid wall contractors and maintenance teams. Uncertainty caused by ECO as well as other UK energy efficiency schemes has impacted on the supply chain in Wales. It has impacted on training, employment of new apprentices and the retention of skilled contractors in the industry. Changes to ECO and other programmes such as the Feed in Tariff has impacted on the ability of independent contractors to compete in the delivery and installation of SWI as well as other energy efficiency measures.

A possible consequence of changes to ECO and other UK Government energy efficiency schemes is that it may inhibit HAs' future ability to maintain and improve its remaining hard to treat housing stock in Wales once ECO and other UK Government schemes end.

There are issues of bottlenecks in the supply chain if the target is applied to phase 1, 2 and 3; however, if DECC decides to apply only to phase 3, then smaller supply chain companies may be affected as there will be a slack for their product and services.

DECC needs to consider the implications of phasing CERO and other ECO streams on the supply chain as well as the implications on the employment and retention of highly skilled contractors before deciding which route to take.

Question 3: Do you agree that underachievement against the CERO target at 31 March 2015 should be able to be carried forward at a penalty rate of 1.1 times the amount of the shortfall?

A number of members have been affected by the changes to ECO following the Autumn Budget announcement. This impacted on a number of prospective schemes and investment.

CHC and members believe that there needs to be some form of penalty if an energy company misses its CERO and other ECO targets. CHC believes that this penalty needs to be publicly clear and transparent. Applying it in a meaningful manner is the important factor. CHC believes that any penalty, either monetary or in further carbon emission targets, should be sufficient so that the energy company share holders would be interested.

CHC believes that energy companies who miss their ECO/CERO and/or energy efficiency targets should be penalised. However, whether it should be monetary or in another form is open to discussion. CHC is concerned that any monetary fine or penalty will not be kept within ECO, therefore DECC needs to ensure that any monetary fine is kept within ECO. DECC should also consider another form of penalty, where an underperforming energy supplier should have an increased carbon emission or CERO target for 2016-17 if they miss their initial target.

Question 4: Do you agree that CSCO and Affordable Warmth targets should remain unchanged for 2015?

The CHC Group welcomes the fact that CSCO targets remain unchanged for 2015. However, members are continually disappointed that they are unable to apply for Affordable Warmth. The inability of HAs to apply for Affordable Warmth has raised some confusion in HA led schemes where HAs have supported 'right to buy' homeowners in receiving Affordable Warmth funding to enable their scheme to go ahead.

CHC and its members believe that Affordable Warmth should also be available to HAs across the UK.

Question 7 Do you have views on how such a cap mechanism should be calculated and then implemented? Do you have a view on how such a cap could work alongside the proposed SWI minimum threshold, and whether there are distinct implications for any of the three ECO sub obligations?

CHC and its members feel that there should be a simple mechanism in place to calculate SWI. The mechanism should make it easy to calculate the SWI and the amount of carbon it will yield, and set the ECO funding accordingly.

Question 9: Do you agree that the ECO scheme should be extended from March 31 2015 to March 31 2017?

The CHC Group welcomes the fact that ECO will be extended from March 2015 to March 2017. However, while extending ECO until 2017 is good in principle, it is a shame that in doing so, the Government needs to make severe cuts in its provision, for example, cutting the CERO target and lowering the SWI target to only 100,000.

It is disappointing that in extending ECO to 2017, fewer householders will be supported out of fuel poverty and fewer hard to treat homes will be targeted and installed with SWI.

From a member perspective, it is disappointing that by extending ECO, but lowering and cutting targets, HAs across Wales now need to re-plan their housing improvement and maintenance plans and look elsewhere to fund its hard to treat properties.

Question 15: Do you agree that all forms of cavity wall insulation, including standard “easy to treat” cavities installed from April, should be eligible as a primary measure under CERO?

Question 16: Do you agree that loft insulation which is installed from April 2014 should be eligible as a primary measure under CERO?

On the whole, RSLs across Wales have already taken advantage of previous UK and Welsh Government energy efficiency schemes and installed loft and CWI measures into their tenanted homes. HAs and, more importantly, tenants, will not

benefit from the fact that loft and cavity wall insulation is available through the CERO.

CHC and its members are concerned that having loft and cavity wall insulation as a primary measure goes against what ECO was designed to target and do. Adding low cost measures such as loft and CWI hinders progress in alleviating fuel poverty and treating hard to treat homes in Wales.

The consultation states that DECC recognises that the new proposals are likely to see a greater focus on cheaper, easier measures and a correspondingly diminished role for SWI in ECO delivery.

One member stated that if the focus is taken away from hard to treat and SWI and more on 'soft' measures such as loft and CWI, HAs in Wales may not be able to justify the level of expenditure required by its funders on its non-traditional stock, hence only delivering reduced improvements, or worst case, not investing, leaving people in hard to heat homes and potential fuel poverty.

CHC and its members are very concerned that, as a consequence of ECO and CERO changes, tenants living in solid wall and hard to treat properties already in fuel poverty and economic hardship will suffer further due to changes to ECO, especially in relation to lowering CERO SWI targets and the re-introduction of 'soft' loft and cavity wall insulation as primary measures.

These changes don't significantly benefit householders and tenants in fuel poverty and they don't improve the energy efficiency of hard to treat homes across the UK.

Question 19: Do you agree with the proposal to extend the number of eligible areas under CSCO from the lowest 15 per cent of areas, as identified using the Index of Multiple Deprivation, to the lowest 25 per cent of areas for measures delivered from 1 April 2014?

CHC welcomes the increase in CSCO eligibility to the poorest 25%. This will greatly improve HAs' ability to develop larger ECO schemes and improve a larger number of its hard to treat properties.

Many rural areas in Wales, in particular West and North East Wales, are in off gas areas and in the poorest 25%. However, there are a number of issues affecting HAs'

ability to develop ECO schemes within rural areas in Wales. RSL properties in rural areas are pepper potted across their areas of operation, traditionally making it difficult to entice energy suppliers to improve their housing stock as they were seen as uneconomical and did not meet carbon reduction target requirements.

A number of HAs in Wales have found it difficult to develop ECO schemes large enough to entice energy suppliers. Having a larger scope of areas by expanding area eligibility helps HAs to conceive and develop more ECO projects.

DECC needs to recognise that HAs work across different local authority boundaries and may not have a large density of properties to develop large scale schemes in one local authority area.

DECC needs to have an obligation for local authorities and energy suppliers to co-operate with HAs and other groups in the development of ECO projects. There were instances under the Community Energy Saving Programme (CESP) across the UK when schemes were developed with or without HA co-operation and housing stock.

Having an obligation on local authorities and energy suppliers to disclose and co-operate with all housing providers, including HAs, on the development of ECO schemes will greatly increase properties targeted within the poorest 25% of communities.

Question 20: Do you agree with the proposal to change the criteria for measures installed under the CSCO rural sub target so that, measures delivered from 1 April 2014 can count towards the sub target if they are installed at any domestic property located in the poorest 25 per cent of rural areas, as well as to households living in rural areas that are in the Affordable Warmth Group.

CHC welcomes that 25% of CSCO will now go to rural areas. This change will hopefully improve the chances of HAs with hard to treat housing stock in rural areas of Wales to entice energy companies to install measures under ECO. However, CHC is concerned with the present DECC rural definition as this does not take into account the dispersed nature of rural Welsh communities. CHC is concerned that some rural ECO schemes may miss out due to DECC's current definition.

One West Wales HA has found it difficult to entice energy companies to fund their prospective ECO scheme. They have a credible SWI scheme involving hard to treat properties within one small town; however, due to their rurality and low density of properties, a number of energy suppliers have stated that they are unable to fund their scheme as it would be uneconomical for them.

DECC needs to take into account the dispersed nature of rural Welsh communities and improve its rural definition to take this into account. DECC needs to ensure that energy companies have the flexibility to work across local authority boundaries to ensure that RSLs and HAs with rural properties have an equal opportunity to obtain ECO funding to improve their hard to treat properties.

Question 26

Do you agree that there should be a SWI minimum figure equivalent to 100,000 properties insulated with SWI by 31 March 2017? Should this be set as number of properties, or as a carbon equivalent? If the former do you have any views on how this should be set? If the latter, do you have suggestions as to how the target should be calculated?

As we have previously stated, the proposed changes to ECO are likely to result in a dramatic reduction in the investment of SWI, irrespective of how DECC decides to set its SWI targets.

The 100,000 target is very unambitious considering the high level of households living in hard to treat homes and in fuel poverty in the UK. Targeting only 100,000 for the whole of the UK will ensure that, due to UK Government policy, only a small proportion of hard to treat properties will be targeted, ensuring that in Wales, a large proportion of tenants currently living in hard to treat homes will remain in hard to treat homes and in fuel poverty. It will also impact on the SWI industry and the ability of independent suppliers to retain their trained staff.

32% of properties in Wales are solid walled, compared to 27% in England. Such properties are more often situated in rural areas, and are often 'hard to treat' in a number of respects, such as situated off the gas network, leaving dwellers more vulnerable to fuel poverty.

Care & Repair agencies in Wales support older people to ensure that their homes are safe, secure and warm, including supporting people out of 'fuel poverty'. Older

people living in 'hard to treat' homes are more vulnerable to fuel poverty, due to living on fixed incomes and the cost of heating homes through oil and solid fuels.

Solid wall insulation is costly and difficult to access through fuel poverty schemes such as NEST (Welsh Government Fuel Poverty scheme in Wales) in Wales.

CHC believes that DECC should consider lowering the target for SWI 2015 and then increasing the SWI target thereafter to 2017.

As stated earlier, if DECC is to cut the number of SWI installations, it should consider putting a regional target or quota in place to ensure that the number of SWI installations an energy supplier must install is fairly delivered. This will ensure that all regions across the UK are treated fairly.

If solid wall insulation targets are cut, as proposed, extremely vulnerable people will be unable to access such insulation and will be plunged further into fuel poverty.

The UK Government needs to ensure that HAs are not disproportionately penalised by the cut in SWI.

Question 27: Do you agree that we should specify SWI lifetimes in legislation for installations accompanied with an appropriate guarantee, and do you have any views on what the specified lifetime should be?

Question 28

Do you have a view on whether lifetime for other measures should also be set in legislation, and if, which measures?

CHC members have raised concerns over the quality of some installations of measures under ECO. A key issue DECC needs to focus on is ensuring that installations being completed are of good quality and will not cause problems in the future. All measures installed under ECO, if they haven't already, should have a guarantee over a number of years. For example, SWI covers 25 years for defective materials.

DECC and Ofgem need to set legislation in particular on SWI as this is a measure which is largely untested. BRE have recently produced their report in relation to SWI issues and members have raised issues with cavities being filled that should never have been filled in the first place. Legislation would be invaluable in the future to

ensure that bad workmanship is corrected and that HAs and homeowners are not liable to any future costs.

CHC believes that DECC should set a requirement for independent post inspections of SWI and other measures to ensure that measures are installed correctly. There should be an independent body such as SWIGA or equivalent to monitor all installers. DECC and Ofgem need to set up guidelines to ensure that, for large schemes, a number of properties are independently checked pre and post installation to ensure quality.

Question 61: Do you have views on the accounting treatment of the obligation?

Members have reported to CHC that there is no straightforward accounting mechanism under ECO. Members have reported that energy companies have different accounting mechanisms for the £/carbon they offer, depending on, for example, whether they are doing it directly or through a HA chosen installer. Also, energy companies offer different £/carbon prices for prospective schemes. All this makes tendering and choosing the right energy company and delivery mechanism more difficult.

HAs are mainly interested in the value for money and community benefits of ECO. The way ECO is designed makes it difficult for HAs, as well as local authorities, to make the correct investment decision.

CHC and its members feel that there should be a simple mechanism in place to calculate SWI. The mechanism should make it easy to calculate the SWI and the amount of carbon a project may yield, and set the ECO funding available accordingly.

At present our member organisations expose themselves to a lot of risk when the level of funding is so uncertain. If there was an improved accounting mechanism, HAs would be able to clearly compare energy companies' offerings and achieve better value for money and achieve longer term plans.

DECC needs to have an ECO accounting policy to make energy companies more transparent and a simpler accounting mechanism for calculating £/carbon tonne rates.

Question 62: Government invites views on what elements of the ECO scheme rules would benefit from simplification, and if so, how this can most effectively be done while still ensuring that the scheme objectives are met and the schemes integrity maintained?

Members have reported that their experience of securing ECO funding has been very challenging to say the least. Members have reported that the ECO scheme is complex and the amount of administration and paperwork needed to comply with Ofgem and DECC requirements is onerous.

One member stated that they were required to work long hours to comply and submit information to meet Energy Company and Ofgem requirements.

CHC understand the strict requirements needed for HAs in Wales to receive ECO funding and to ensure that work has been carried out to a good standard; however, the way ECO is designed, there is too much of a burden on ECO scheme managers to deliver a scheme.

One HA ECO scheme manager reported that he and his team had to attend over forty contract meetings with energy providers and their investment contractors over the course of their ECO scheme timeline. CHC feels that this is an unnecessary burden on HAs and other organisations.

DECC needs to ease the reporting burden on HAs and scheme managers. It needs to refine and remove the complexity of the reporting systems. It needs to develop a simpler accounting procedure to ensure that measures and £/carbon tonne rates are counted effectively. It also needs to develop a simpler tracking system for scheme managers.

Question 63: Government invites views on what elements of the ECO scheme rules would benefit from simplification, and if so, how this can most effectively be done while still ensuring that the scheme objectives are met and the schemes integrity maintained?

The consultation asks under question 63 whether the Government could better utilise local authorities and /or other trusted local organisations to promote delivery of ECO.

HAs are well respected and trusted local organisations in Wales. HAs are experienced in sourcing and delivering UK and Welsh Government energy efficiency programmes, leading on tenant engagement and providing energy efficiency, fuel poverty and benefit advice to its tenants as well as the wider community.

HAs across Wales already have a wealth of experience in promoting UK and Welsh Government energy efficiency schemes. For example, they engaged and worked with communities to promote programmes such as Carbon Emissions Reduction Target (CERT) and CESP, as well as Arbed in Wales.

Care & Repair agencies in Wales provide technical assistance to support older people to remain living in their own homes. Technical advisors advise, design and oversee works such as adaptations and works to improve energy efficiency, supporting older people through the whole process. Care & Repair agencies also assess people's financial capabilities, making applications to benefits and grants which are applicable, such as Nest.

Navigating and comprehending fuel poverty and energy efficiency schemes, particularly in Wales, due to the number of national and locally available schemes, is incredibly difficult for the consumer. Care & Repair have ensured that their advisors are able to support older people to access the schemes which are best for them, through training and knowledge transfer.

Care & Repair agencies support older people throughout Wales and are therefore well placed to promote the delivery of ECO. We believe that partnerships with such organisations in the public and third sector would be of benefit. This would help ECO providers to identify the most vulnerable householders, who would benefit from ECO.

Care & Repair are actively seeking to set up a social business to work with an energy company/ECO provider to support them in providing measures, funded under ECO. This would enable us to identify and support older home owners through the process and help to lift them out of fuel poverty.

DECC needs to recognise that HAs and other agencies are sometimes better placed to lead or advise on ECO schemes than local authorities. Local authorities, due to budget cuts, are understaffed and may not have the capacity or knowledge of HAs to lead on ECO schemes.

Tenant engagement, behavioural change and energy efficiency advice

HAs are experts in tenant engagement. Due to the economic downturn and, in particular, due to recent benefit changes, there has been a strong level of investment in tenant engagement in recent years.

HAs in Wales have expert knowledge in tenant engagement and have a wealth of experience in providing energy efficiency and behavioural change advice to tenants and people in the wider communities.

HAs across Wales have developed numerous behavioural change programmes – educating tenants through targeted engagement programmes aimed at reducing fuel poverty, reducing energy consumption and training volunteers to provide energy advice.

They have developed numerous behavioural and energy efficiency education projects. These projects have been successful in training and employing unemployed tenants to become energy advisors and mentors and have encouraged tenants to become more energy efficient and reduce their energy consumption.

Best practice learnt from these projects could be developed further and, with additional funding, delivered in other communities and wider areas.

Here are two case studies of how HAs promote energy efficiency and how they could support in the delivery of ECO. There are many other such schemes across Wales where HAs are delivering energy efficiency schemes and support to their tenants and the wider community.

- In North Wales, one HA has developed a community energy wardens programme targeting people who have been in long term unemployment and offering them six month paid work placements, working with residents in deprived communities to reduce energy costs and carbon emissions through energy advice. These community energy wardens have provided advice to tenants to promote their HA's ECO scheme as well as advising 'Right to Buy' homeowners in the community on how to obtain Affordable Warmth and working with energy suppliers to obtain money on their behalf.
- In South East Wales, a HA has been delivering a successful project which aims to tackle fuel poverty in low income areas by providing energy efficiency advice and small scale energy efficiency improvements. The project involves using community groups to promote energy efficiency, install energy efficiency measures and advise and raise awareness of reducing energy bills and fuel switching and becoming Green Energy Champions. This project has been very successful in delivering change within the community and has just won an NEA award for community benefit.

These types of schemes could be rolled out by DECC to support the take up of ECO and, in particular, Affordable Warmth in communities.

Delivery of Arbed Phase 1

In Wales, HAs delivered the Welsh Government's first phase of the Arbed programme across Wales' Regeneration Areas.

HAs were funded to deliver domestic energy performance projects which, amongst other aims, supported fuel-poor / low-income households, led on the delivery of energy efficiency measures most appropriate to properties, and worked with partners to reduce the impact on households and maximise private household involvement.

Arbed Phase 1 funded measures to over 7,500 households in Wales. Over 4,000 social and private homes with SWI were installed below market rate due to the economies of scale gained from area-based schemes and leveraged funding.

Arbed Phase 1 supported the development of local supply chains in low energy technologies and energy efficient measures. Installers on Arbed Phase 1 operated primarily, or solely, in Wales with a number of the remaining companies having large employment bases in Wales.

Through Arbed Phase 1, one HA installed solar panels and SWI on its hard to treat properties. Through the installations of these measures, tenants saved money on their heating and electricity bills.

Using local suppliers and Welsh-based installers sourced from Welsh HA installer networks, Arbed Phase 1 was successful in improving the energy efficiency of tenanted and homeowner properties across Wales.

Below is the evaluation for Arbed phase 1:

<http://wales.gov.uk/topics/environmentcountryside/energy/efficiency/arbed/publications/phaseoneevaluation/?lang=en>

HAs are well respected and trusted local organisations in Wales. In Wales in particular, HAs have a wealth of experience of delivering energy efficiency schemes, behavioural change programmes and community and tenant engagement.

DECC and devolved governments should utilise the delivery, tenant engagement skills and experience of HAs across Wales and the rest of the UK. DECC should be utilising the knowledge of HAs in their delivery of ECO.

If you require further information about any issues raised within the CHC consultation response, please e-mail: tomos-davies@chcymru.org.uk.

**Community Housing Cymru
16 April 2014**