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Dear Sir

Consultation – Publically Available Specification 2031

The Institute of Historic Building Conservation is the professional body of the United Kingdom representing conservation specialists and historic environment practitioners in the public and private sectors. The Institute exists to establish the highest standards of conservation practice, to support the effective protection and enhancement of the historic environment, and to promote heritage-led regeneration and access to the historic environment for all.

The Institute's comments on PAS 2031 are as follows:

1. the draft is fundamentally flawed and out-of-date as it focuses on certification by individual measures, rather than on the whole-house approach recommended by the Hansford Review and the forthcoming Bonfield Review
2. the current certification processes and bodies have not recognised the major issues arising from inappropriate EEM applied to buildings of traditional construction – most evident to date in relation to cavity wall insulation, but also for solid wall insulation as highlighted by BRE et al.
3. there is an urgent need for reform of the certification processes and bodies to address these issues
4. this PAS 2031 consultation is premature pending the publication of the Bonfield Review. Its implementation before the Bonfield Review has been published, and by not taking on board the Bonfield Review's recommendations, risks a needless

waste of money and carbon on inappropriate ECO works that will require subsequent rectification.

Yours sincerely

A handwritten signature in blue ink that reads "L. Pickford". The signature is written in a cursive style with a large initial 'L' and a distinct 'P'.

Les Pickford
IHBC Consultations Consultant