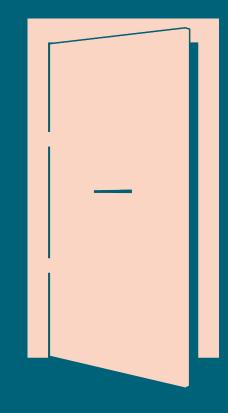
A Foamidable Challenge

Tackling the impact of the mis-selling of spray foam insulation







Executive Summary

The last few years of sky-high energy prices have led many people to look for ways to reduce their bills. Insulating your home can be an effective way of doing this, with many households being able to save several hundred pounds a year.¹

If all UK homes were upgraded to an Energy Performance Certificate (EPC) rating of C or higher, this could save consumers £24 billion on their energy bills by 2030.² For this reason, many people have turned to spray foam insulation.

However, when this form of insulation isn't installed properly, it can have disastrous consequences. For those affected, the consequences can go far beyond inconvenience. In the worst cases those who have this in their roof begin to see serious material damage to their homes such as condensation, damp and rotting timbers, all of which carry potential health risks. We have seen cases of our clients falling victim to mis-selling of this insulation, having been promised savings or benefits that never materialise.

The costs of removal and remedial work can be substantial, running into the thousands of pounds. To complicate things further, the removal market is rife with rogue traders looking to take advantage of desperate consumers. Yet, for many affected by this, there is nowhere obvious to turn. There is no clear source of independent advice, no accessible route to redress, and no safety net. As a result, consumers are often left to struggle on their own to put things right. These ongoing problems pose a risk to the Government's Warm Homes Plan which aims to upgrade up to 5 million homes in this Parliament. We welcome the Government's recent announcement to strengthen the consumer protections landscape. This will help to ensure growth in these markets while reducing consumer detriment and restoring confidence. Action taken must cover the full range of measures and technologies, including upgrades through government schemes and outside of them. It is vital that people feel supported through the process and know where to turn when things go wrong.



Our findings

- Over the past four years, the Citizens Advice consumer service has seen the numbers of complaints relating to spray foam insulation skyrocket.
- In 2024 it represented 1 in 5 of the complaints we received about all low carbon installations.
- In that same period it represented 1 in 3 of all complaints about insulation.
- A large number of these complaints have been driven by an increase in rogue traders operating in this market using tactics like cold calling, mis-selling and pressure selling.

To better understand the issues, Citizens advice commissioned polling to investigate the issues experienced by people who have had spray foam insulation installed in their loft. We found that of those who told us they had spray foam insulation:

- One third (33%) of them had at least 1 issue with it.
- 8% of them were told that it must be removed.
- 6% of them had been told it had caused damage to their roof.

Recommendations

The government should ensure that those who are having issues with **government backed installations** are supported. These households should not be left without help to put things right or out of pocket paying for their own repairs, so it is vital that the Government provides support to resolve issues.

Regulation should ensure more accessible routes of redress for those affected, including the creation of a single Ombudsman.

3 The Government should **establish a mandatory single quality scheme** for the low carbon home upgrades market. This would ensure people can trust their installers in not only spray foam insulation but across the market.

There must be **stronger legal enforcement** against companies acting maliciously in this market.

Consumers should have easy access to **free and independent advice** at all stages of the process

5

What is spray foam insulation?

Spray foam is an insulation that is 'sprayed-on' as a liquid and expands into a foam to help trap in heat. It can be used to insulate walls, ceilings, floors and roofs in residential and commercial buildings.

It can be an effective form of insulation but it is not always appropriate. For example, spray foam insulation shouldn't be installed in properties with a timber framed roof because the timber needs to be able to breathe and sprayed-on insulation prevents this. This foam can also can make it more difficult for the timbers to be inspected, causing uncertainty for surveyors.

Spray foam can also cause problems if installed poorly, such as using the wrong type of foam, applying too much, applying it to damp timbers, blocking ventilation, or even covering up existing defects. If installed inappropriately or poorly spray foam can cause problems with ventilation, leading to damp and in some extreme cases decomposition of the roof timbers. This report will focus specifically on its use in roofs and attic spaces, where it is most commonly used.

For the majority of people who have spray foam in their loft, it will have been installed correctly and will be appropriate for the property, so will not cause problems.

However, our research shows that around **one third (33%) of people we surveyed with spray foam insulation in their loft have reported having problems.** This means that they may need to have it removed, or may have already done so. Some have already reported damage to their roofs.

Because of these issues it has developed a poor reputation amongst lenders, leaving people trapped in homes they're unable to sell or remortgage unless the foam is removed

Complaints have risen sharply over recent years.

The Citizens Advice consumer service offers free advice on consumer issues. Between 2020 and 2023 the number of complaints relating to spray foam insulation increased steadily but in 2024 complaints more than doubled from the the previous year. In 2024 spray foam was mentioned in 21% of all of the cases related to green home upgrades. This is up from 9% of cases in 2023.

Our data shows the sharp rise in 2024 is in part being driven by an increase both the number of rogue traders operating in this market and an increase in tactics like cold calling, mis-selling and pressure selling. As well as a rise in people worried about selling their home.

Number of consumer service complaints relating to spray foam between 2020 and 2024, by quarter



The unchecked growth in spray foam insulation

Rising energy costs and government backed schemes have driven demand for insulation, with spray foam marketed as an easy solution. However, poor oversight has led to mis-selling and bad installations, including instances where it was not the correct measure to install at all.

Government Schemes and Funding

Some installations were funded through schemes like the Green Homes Grant. Consumers who received these installations may have trusted that spray foam was appropriate for their property because they were receiving it through a Government scheme. But it is clear that in some cases, spray foam was installed in properties where it was not appropriate or it was installed with poor quality workmanship.

Aggressive Cold-Calling and Mis-Selling

Many homeowners were pressured into installations through cold calls, door-to-door sales, and misleading advertisements. Some traders falsely claimed their spray foam products were government-approved or were required for EPC improvements. Vulnerable consumers were particularly targeted, often with high-pressure sales tactics that did not fully explain the risks.

A Market with No Unified Standards

The lack of an easily recognisable, mandatory quality standard for spray foam insulation makes it difficult for consumers to know who to trust. The current consumer protections landscape for low carbon technologies is made up of a range of different organisations including consumer codes, certification bodies and insurance providers. This can be difficult to navigate for consumers and means there is no single brand or set of consistent standards that consumers can check their installer against. This creates opportunities for unqualified or rogue traders to carry out installations without properly assessing whether spray foam is suitable for the property.

Consumers would benefit from a **mandatory single quality scheme** for all traders operating in the low carbon home upgrade market, including mandatory certification. Requiring traders to provide certification with an installation would give consumers confidence that installers are being held to high standards and are only installing measures that are suitable for their property.

This would make it harder for rogue traders to continue to operate by moving between schemes or targeting the "able to pay" market, where accreditation isn't currently required. However, any quality scheme must be underpinned by a **robust legal enforcement regime** with clear and enforceable consequences for criminal behaviour. This new approach to enforcement would provide a backstop to help stamp out fraud and fraudulent practices.



A significant number of people with spray foam insulation are experiencing problems

Among those we surveyed who reported having spray foam insulation, 1 in 3 said they had experienced at least one issue with it

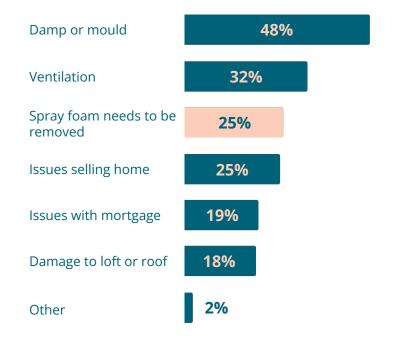
33% of the people who told us that they had spray foam insulation in their loft said they had experienced at least one issue. This would suggest that a large proportion of people could be forced to remove their insulation, fix it or in extreme circumstances, completely replace the roof of their property.

The most common problems people reported were cases of damp or mould, followed by issues with ventilation. This is because when spray foam is incorrectly or inappropriately installed it can lead to too much moisture being trapped.

Of those people who told us they had experienced issues, **25% of them were told that their foam needed to be removed.** Failure to remove the insulation can make lenders hesitant to provide mortgages for these properties. This is reflected in the number of people we see who are struggling to sell or remortgage their home or get finance. **25% of people experiencing issues have reported problems with selling their house.**

In a worst-case scenario, the foam can damage the roof to such a degree that the roof will need to be repaired or completely replaced. This can cost tens of thousands of pounds to fix, an amount that means many people simply can't afford to fix the problem.

Specific problems with spray foam insulation by percentage of respondents who've had issues with it



Spray foam has developed a bad reputation

Lenders are wary of homes with spray foam insulation

In 2024, 15% of the contacts to our consumer service about spray foam were related to worries about the mortgageability of the property. Some of the people had been told by a lender that with their spray foam, they could not get a mortgage. Others had been told this by a trader.

We also saw an increasing number of people coming to us due to the increased publicity that spray foam has received to over the past 2 years. This is one of the drivers of the increased contacts we have seen.

People have contacted us concerned about the potential damage spray foam can do and that it can make it difficult to sell their home. These people had not yet experienced issues but were simply worried about the potential for future issues.

Some traders seem to be capitalising on this concern. People with spray foam insulation have told us that they have been approached by a trader who had told them it needs to be removed. These traders might well be genuine, and the removal necessary. However, experience from other markets such as cavity wall insulation suggests that some of them will be taking advantage of people's fears and recommending removal when it is not required.

Emma's story - Finance is being denied

Emma paid to have spray foam insulation in 2022. Nearly 3 years later she is trying to sell her home. She has been told that potential buyers cannot secure a mortgage on the property due to the insulation. As a result, she is facing a **£20,000** bill to have it removed.

She contacted the National Insulation Association for advice and also reached out to the trader, but they denied any liability, insisting that the product is good and that banks are overreacting. Despite this, Emma cannot find a lender that is willing to take the risk, and is unable to sell without removing the foam insulation.



The cost of repairing spray foam damage

Many of the people experiencing issues have paid or will have to pay to fix the problem

Spray foam has developed a bad reputation. However, this is because if left unattended, incorrectly installed spray foam has the potential to permanently damage the roof it is installed in. It can rot the timber frames and just having the foam in the loft can make it difficult for a surveyor to assess the condition of the roof. This issue will particularly affect homeowners, with or without a mortgage.

Because of this we have seen that <u>38% of homeowners with spray</u> foam issues in our survey have had problems selling their home, remortgaging or releasing equity. This trend is echoed in the data collected by our consumer service, where 15% of spray foam cases related to issues around mortgages. For this reason many homeowners feel they have no choice but to pay to remove their spray foam.

Data from our consumer service tells us that cost of removal can cost from as much as £2,000 all the way up to tens of thousands of pounds in the most severe cases

Our polling found that:

• **<u>71% of homeowners</u>** we surveyed who were experiencing issues have either already paid, or have been told that they will have to pay to fix their issue.

Eric's story - The cost of roof replacement

A client called our consumer service and told us that he was calling on behalf of an elderly friend, Eric, who has a property he was trying to sell. Eric had spray foam installed in his loft and was told that he could not sell his home unless this was removed and the roof was fixed. Eric felt like he had no choice. So he agreed for the work to be done. He paid <u>£49.175</u> for the work.

David's story - Removal due to damp

A few years ago, David paid for spray foam to be installed in his roof. Recently, he received a cold call about insulation and agreed to have a representative inspect it. Following the inspection, he was informed that the insulation had shrunk away from the beams and was damp.

Because of this, David has been advised that he may not be able to sell or remortgage his property because of the spray foam insulation. He was also told that the insulation must be removed and this would cost him <u>£6,000</u>.

David called us because he wanted to recover the cost from his original trader. But he thinks that they have gone out of business, leading David to foot the bill himself.

Impact on Government-funded schemes

The majority of respondents to our survey said they paid for their spray foam insulation themselves

Depending on the size of the property, installation should cost between $\pounds 2,500$ and $\pounds 4,000.^4$ Over 40% of respondents with spray foam insulation paid at least in part, with cash. With many also using forms of credit to help pay.

However, some spray foam installations have made use of government funding.

How respondents who installed spray foam paid for it

Cash		42%
Paid for by landlord/housing association	16%	I
Credit card / unsecured loan	15%	
Fully or partly funded by a government grant/subsidy	14%	
Fully or partly funded by the Council	8%	
Borrowing from friends or family	7%	
Fully or partly funded by an energy company	6%	
Other	6%	
Prefer not to say	4%	
Remortgaging my home	4%	
Equity release	3%	

22% of those who told us they had spray foam had used **government or council funding to pay for it.**

Our consumer service data shows us that this has been installed using various grants, with clients specifically mentioning both ECO4 and the Green Homes Grant. Many of the people who contact us do not know the specifics of what grant was used. They just know that they did not have to pay for the work.

If the insulation installed using government-backed funding was installed inappropriately or has caused problems, then **the government needs to take responsibility for ensuring those affected get support to put any issues right.** Where problems are identified, installers should be held accountable and required to cover the costs of remediation.

Failing to address these issues risks damaging the reputation and future trust of government-backed schemes.

The remaining consumers who did not use this funding cannot be ignored. Many are left without a clear route to redress if they experience issues. We are calling for the creation of a **single ombudsman** to provide an independent, impartial avenue for complaints, with the authority to investigate historic installations and take action where appropriate. There should also be a formal process for all consumers to have their installations assessed.

Rogue traders exploit gaps in the spray foam market

The spray foam market has become a target for rogue traders who exploit gaps in consumer protection, leaving consumers with significant financial and structural issues.

Tactics include:

- **Cold calling**: often directed towards more vulnerable targets such as the elderly, who are more likely to be at risk of being taken advantage of.
- **High-pressure Sales**: rogue traders often use aggressive tactics to pressure consumers into paying for unnecessary or substandard work.
- **Misleading Claims**: promises of lower energy bills and higher property value are often false, leaving homeowners facing expensive repairs.
- **Poor quality work**: many rogue traders fail to complete jobs properly, leaving homeowners with incomplete or substandard installations.
- **Install and remove scams**: traders install foam unnecessarily, then they, or sister companies later charge homeowners for removal, even though it wasn't needed in the first place.

These practices highlight the urgent need for a **stronger regulatory framework** to support consumers and hold rogue traders accountable. A **single Ombudsman service** would provide consumers with a clear and accessible channel to seek redress, ensuring that they are not left without support or recourse when things go wrong.

However, an Ombudsman can't deliver the right outcomes for consumers on its own. Improved redress processes must be backed up by a **legal enforcement regime** that has appropriate powers to tackle criminal behaviour and provide clear consequences for wrongdoing. To protect consumers and restore trust in the market, **stronger legal enforcement** is necessary. A regulator with real enforcement powers should be established to hold rogue traders accountable and impose penalties for mis-selling or substandard work. It is also crucial to prevent these traders from continuing their harmful practices by closing their businesses and reopening under new names.

Consumers would also benefit from proper channels of redress such as **a single Ombudsman service**. Many consumers find it difficult to get things put right, even when they have used a government scheme. A service such as this would help them gain access to the help they need to resolve issues.



Examples of rogue traders

Joan's story - Install and remove scam

A trader approached Joan, offering to install spray foam insulation with the promise that it would improve her home's energy efficiency. She agreed to the work and paid £2,600 for the job.

However, a short time later, Joan was contacted by another company with a similar name and was told that the spray foam needed to be removed as it was not right for her property. Joan was convinced to have it removed and was charged another $\pounds 2,000$.

Joan's daughter believes that the two traders may be the same company or at least linked and have deliberately targeted her vulnerable mother.

In total, she paid £4,600 - only to end up back where she started.



Sophie's story - Poor quality removal

Sophie hired a trader to remove spray foam insulation from her property. At the time, she was heavily pregnant and unable to climb into the loft to check whether the work had been properly carried out. She later discovered that none of the foam had been removed from the attic and that the trader had done very little, if anything, to complete the job.

When Sophie contacted the trader to request that they return and finish the work, they agreed but never followed through. She then hired a specialist surveyor, who confirmed that the insulation had not been removed and that she would be unable to sell the house in its current condition.

Sophie has since been unable to contact the trader and has been advised that it will cost around £3,900 to resolve the issue.



Ensuring better protections and routes of redress The scale of harm we see in the spray foam market is concerning. It is vital that action is taken to help people resolve the issues they are facing.

The scale of harm we see in the spray foam market is concerning. It is vital that action is taken to help people resolve the issues they are facing. Furthermore, stronger and more robust consumer protections must be urgently implemented before the number of installations increases—especially as this market grows to support the net zero transition.



1. Make it right - Ensure that those experiencing problems with installations backed by government schemes are given help. These people should not be left out of pocket paying for their own repairs and it is vital that the Government provides support to resolve issues.



2. Put it right - Make sure those with spray foam issues have access to a simple redress scheme, including a single Ombudsman. Spray foam insulation failures can leave consumers stuck in a complicated complaints system. Regulation should ensure there is a single Ombudsman covering the whole retrofit market so people aren't bounced between different schemes when things go wrong. This would provide a clear, reliable route to resolve spray foam disputes—and create consistency for consumers across all types of low carbon upgrades.

3. Get it right - Create a single mandatory quality mark to prevent spray foam failures

The Government should establish a mandatory single quality mark for the insulation market, and low carbon home improvements market as a whole. A single, overarching body would help stop rogue traders from moving between accreditation schemes, while driving up standards in spray foam installations and beyond. Stronger brand recognition and clear, consistent protections will make it easier for consumers to choose trustworthy installers and seek redress when things go wrong—not just for spray foam, but for all home retrofit works. Membership of this scheme should be mandatory for anyone operating in the low carbon home improvements market, regardless of whether they are part of a government-backed programme.

4. Stamp it out - A legal enforcement regime should have the appropriate powers to tackle wrongdoing. The widespread problems with spray foam showshow what happens when enforcement falls short. We need a regulator with real powers to investigate bad practice, stop rogue traders, and apply meaningful penalties—whether the harm is caused by spray foam or any other retrofit measure.



5. Offer advice - Consumers should have access to independent, high-quality advice. Spray foam cases show how easily people can be misled or left without clear guidance. Regulatory reform should guarantee a properly funded and resourced consumer advice service that goes beyond generic support. This enhanced service would offer tailored advice, helping homeowners navigate decisions from pre-installation to resolving problems. For vulnerable consumers, or those facing major barriers to redress (like complex spray foam cases), extra support should be available through case-handling services based on successful models like the 'Extra Help Unit' in the energy market.

Methodology and references

- 1. Citizens Advice Insulation Nation: The roadmap to a future of affordable energy bills, 2022
- 2. Citizens Advice Home advantage: Unlocking the benefits of energy efficiency, 2023
- 3. Poll conducted in January 2025 by Yonder Data Solutions, with a nationally representative sample of 12,476 adults across the UK. 15% of the 12,476 respondents said they had installed spray foam in their loft.
- 4. The eco experts 5 big problems with spray foam insulation https://www.theecoexperts.co.uk/insulation/spray-foam-costs

Citizens Advice helps people find a way forward.

We provide free, confidential and independent advice to help people overcome their problems.

We are a voice for our clients and consumers on the issues that matter to them.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.



Published:

Contributors: Benedict Guindi, Bea Adam-Day

Citizens Advice is the operating name of The National Association of Citizens Advice Bureaux. Registered charity number 279057.