

**BRUFMA Ref. 08-1078**  
**BRUF/1 & Council (6-5-2008)**

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## ASA Adjudications

### ACTIS Insulation Ltd

Unit 1  
 Cornbrash Park  
 Bumpers Farm Industrial Estate  
 Chippenham  
 Wiltshire  
 SN14 6RA

**Date:** 23 April 2008  
**Media:** Brochure  
**Sector:** Household  
**Agency:** Outside Agency Not Stated

**Number of complaints:** 1

#### COMPLAINT:

Objection to a brochure for roof insulation distributed in 2005. The brochure stated "TRI-ISO SUPER 9 Insulation for roofs ... Thermally equivalent to 200 mm of mineral wool when installed in a roof situation, as certified by the European certifying body, BM TRADA CERTIFICATION (following real building trials, certification n°0101) ... THERMAL EFFICIENCY equivalent to 200 mm of mineral wool RT = 5\* ... \*in situ measured values." The complainant challenged:

1. the claim "Thermally equivalent to 200 mm of mineral wool" and
2. the quoted thermal resistance "RT = 5".

#### ADJUDICATION:

THIS ADJUDICATION REPLACES THAT FIRST PUBLISHED ON 31 MAY 2006 AND SUBSEQUENTLY WITHDRAWN ON 26 JULY 2006. THE COMPLAINTS REMAIN UPHELD BUT THE WORDING HAS CHANGED.

Actis Insulation Ltd (Actis) said they had stopped advertising TRI-ISO SUPER 9 because it had been replaced with their new product TRI-ISO SUPER 10. They said the efficiency of their products was demonstrated by their track record in the market. Actis said they had commissioned TRADA Technology Ltd to assess and report on the TRI-ISO SUPER 9 product. Its sister body, BM TRADA Ltd had certified TRI-ISO SUPER 9 on the basis of those results. They provided us with a copy of the BM TRADA Certificate dated February 2005, and Report dated August 1997, which they said substantiated their claims. They said that BM TRADA was a leading multi-sector certification body accredited by the United Kingdom Accreditation Service.

Actis explained that TRI-ISO SUPER 9 was different from traditional bulk insulation because it was a multi-foil product that used layers of reflective foils spaced with synthetic wadding and foams. They said the product required less space than traditional bulk insulation and, therefore, internal insulation cavities could be made smaller, and internal useable spaces could be enlarged without compromising efficiency of insulation.

Actis argued that traditional methods of testing were not appropriate for their product because such methods measured thermal efficiency mainly by measuring heat transfer by conduction. They said their product inhibited various methods of energy transfer including radiation and convection as well as conduction, and worked principally by reflective radiative heat. They said the effective functioning of their insulation system required installation of the sheets of multi-foil as a "sealed envelope" with taped joints between sheets, so testing of small pieces of product in a laboratory was inadequate.

Actis also argued that traditional methods of testing did not allow representation of the

real behaviour of building materials once installed. The test supervised by TRADA Technology had used 'in situ' testing involving a real external environment with variations in temperature, humidity, etc. The tests were carried out in Limoux in France over two months in early 1997.

They explained that the 1997 testing used two identical and adjacent chalets, one of which was lined completely with TRI-ISO SUPER 9 and the other was lined with 200 mm of mineral wool. Because the manufacturers quoted a thermal resistance of 5 m<sup>2</sup>K/W for the mineral wool and the test results showed an equivalent thermal performance in the two chalets, the report concluded that TRI-ISO SUPER 9 was "thermally equivalent to 200 mm of mineral wool" and had a thermal resistance of 5 m<sup>2</sup>K/W. Actis therefore maintained that the BM TRADA Certification demonstrated the thermal efficiency of their product and provided proof of their claims.

#### 1. Complaint upheld

The ASA obtained expert advice. We understood that the 1997 testing had not tried to measure the thermal resistance of TRI-ISO SUPER 9 directly, but had compared the measured energy consumption and internal temperatures in a chalet lined with TRI-ISO SUPER 9 with those in a similar chalet lined with 200 mm of mineral wool. The TRADA report stated that the construction method of both test chalets was representative of real buildings. We noted that both insulation systems were installed in the test chalets without a tiling underlay between the insulation and the ventilated space under the roof tiles, and with no internal plasterboard lining to the interior. Actis argued that the use of underlay and plasterboard was not common in France in 1997, but we understood that a tiling underlay and a plasterboard lining were used in most real buildings and noted that both the underlay and the plasterboard lining featured in the brochure for TRI-ISO SUPER 9 and the BM TRADA Certificate for TRI-ISO SUPER 9. Because there was no tiling underlay and no plasterboard lining, air would penetrate the mineral wool from the outside, and to a lesser extent, from the inside degrading its thermal performance. In addition we noted that care was taken to seal the joints between the pieces of TRI-ISO SUPER 9, which in itself was completely airtight, so as to eliminate air infiltration in the chalet that contained TRI-ISO SUPER 9. According to the TRADA report and the photographs annexed to it, the joints between the pieces of mineral wool in the second chalet were left open, which would lead to some ventilation in that chalet. Actis produced recent statements suggesting that TRADA were aware of the problem at the time and had directed Actis employees to seal the joints, and that this had been done, but there was no evidence in the contemporaneous documentation that that had been done. We concluded Actis had not substantiated the claim. We noted the ad was no longer appearing, but told Actis not to make claims in future advertising unless they held sufficient substantiation at the time of publication.

#### 2. Complaint upheld

We understood that RT was a symbol of total thermal resistance and typically had the standard unit of measurement of m<sup>2</sup>K/W. We noted that the claim "RT=5" was not qualified by any recognised units of measurement e.g. m<sup>2</sup>K/W and a small footnote stated only 'in situ' measured values" without further explanation. While a professional trade reader would probably not be misled by this omission, Actis agreed to include a unit of measurement in future. We noted that the TRADA Technology report did specify an overall resistance (RT) of 5.0 m<sup>2</sup>K/W derived from the "in situ" testing. Because heat loss in the chalet with TRI-ISO SUPER 9 was by transfer through the fabric, whereas heat loss in the chalet with mineral wool was from a combination of fabric transfer and air penetration (see 1 above), we considered that it was not possible to compare accurately the thermal resistance in the two test chalets. On the other hand, the ASA's expert considered that it was possible to estimate the thermal resistance for the well sealed TRI-ISO SUPER 9 chalet, from the data recorded there, as being between 1.6 and 1.8 m<sup>2</sup>K/W, not 5 m<sup>2</sup>K/W. Even if, as Actis argued it was not possible to estimate an actual RT value from the data for that chalet alone, it was clear to us that the report did not substantiate the claim "RT=5". We noted the ad was no longer appearing, but told Actis not to make claims in future advertising unless they held sufficient substantiation at the time of publication.

The brochure breached CAP Code clauses 3.1 (Substantiation) and 7.1 (Truthfulness).

Adjudication of the ASA Council (Non-broadcast)

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Mid City Place, 71 High Holborn, London, WC1V 6QT, United Kingdom