



Installation of spray foam insulation

Guidance for businesses that install spray foam insulation

This guidance is for England, Scotland and Wales

CONTENTS

Introduction.....	2
The legal requirements.....	2
Legislation etc.....	5

businesscompanion
trading standards law explained

This guide was produced as part of a business advice project by the Department for Business and Trade and the Chartered Trading Standards Institute.



Published by:
Chartered Trading Standards Institute, 1 Sylvan Way,
Southfields Business Park,
Basilston SS15 6TH
www.tradingstandards.uk
01268 582 200

© Copyright Chartered Trading Standards Institute (2025)

www.tradingstandards.uk | www.businesscompanion.info

INTRODUCTION

What is spray foam insulation?

In this guide, the words 'must' or 'must not' are used where there is a legal requirement to do (or not do) something. The word 'should' is used where there is established legal guidance or best practice that is likely to help you avoid breaking the law.

Background

Spray foam insulation is a liquid polyurethane that expands into a dense foam; this can be sprayed into walls, floors and most commonly in roof spaces. Its intended purpose is to improve home energy efficiency, reduce energy bills and lower greenhouse gas emissions by making a home more thermally efficient.

Spray foam insulation comes in two main types:

- open-cell foam:
 - lightweight, flexible and good for soundproofing
- closed-cell foam:
 - denser; provides better thermal insulation and moisture resistance

Before installation, businesses should be aware that the use of spray foam can have significant practical implications concerning mortgage eligibility and potential property damage. This has made it a high-risk material for many lenders and surveyors, particularly if it has been applied incorrectly or without proper documentation.

Spray foam insulation, especially when applied to roof spaces, can:

- obstruct structural inspections, making it hard for surveyors to assess roof condition
- trap moisture, potentially leading to timber rot or structural damage
- impact ventilation, increasing the risk of condensation and mould

THE LEGAL REQUIREMENTS

Ensure that you are abiding by the law

Legal and regulatory compliance

Regulatory requirements for spray foam insulation focus on manufacturer certifications, proper installation by trained professionals, compliance with building standards, and providing appropriate documentation to homeowners.

Professional installation

Due to the hazardous chemicals and specific application process, it is strongly advised that spray foam insulation is installed by a trained, accredited professional. The National Insulation Association warns against DIY installation.

National recognised qualification

The ABBE Level 3 NVQ Diploma in Spray Foam Insulation and Application is the UK's first nationally recognised qualification for spray foam installers. It certifies individuals to apply spray foam insulation in both residential and commercial settings.

Professional credibility

While not legally required, having a recognised qualification can:

- improve customer trust
- reduce liability risks
- increase job opportunities

Manufacturer control

Spray foam manufacturers are legally responsible for approving and continuously monitoring their accredited installers.

Competence checks

The Construction (Design and Management) Regulations 2015 (CDM) apply to domestic contracts and require competence in the installation process. A lack of knowledge of these Regulations is an indication of an unqualified installer.

Product certification

The spray foam product used must hold an independent test certificate from a recognised body, such as the British Board of Agrément (BBA) or Kiwa.

A product with BBA or Kiwa certification is considered compliant with building regulations.

The installer should provide a manufacturer or insurance-backed warranty for the installation.

Building regulations

All installations must comply with national building standards, which are governed by a framework of building regulations:

- Building Regulations 2010 (these Regulations cover England and Wales)
- Building (Scotland) Regulations 2004

A set of approved documents (see below) provide guidance on ways to meet the building regulations, particularly those relating to moisture control, airtightness and ventilation.

Moisture management

Incorrect spray foam installation can trap moisture against roof timbers, leading to condensation, damp and rot.

Moisture plans should be in line with BS 5250: Management of moisture in buildings. Code of practice and the relevant sections of the building regulations.

Approved documents:

- England - Approved Document C

- Scotland - Section 3 of the Technical Handbook
- Wales - Approved Document C

Airtightness

Airtightness helps prevent moisture-laden air from entering colder roof spaces, which can condense and cause structural damage.

Airtightness plans should be in line with BS 5250 and the relevant sections of the building regulations.

Approved documents:

- England - Approved Document L
- Scotland - Section 3 of the Technical Handbook
- Wales - Approved Document L

Ventilation requirements

The installer must be aware of the specific ventilation needs of the property, as the installation of spray foam can affect how well outside air gets into the building. Spraying foam directly on the underside of roof tiles can be hazardous. Proper airflow is required, both pre- and post-installation.

Ventilation plans should be in line with BS 5250 and the relevant sections of the building regulations.

Approved documents:

- England - Approved Document F
- Scotland - Section 3 of the Technical Handbook
- Wales - Approved Document F

Industry bodies like the Insulation Manufacturers Association (IMA) and RICS also provide guidance relating to installations.

Protected / listed buildings

Listed buildings or protected structures require consent before installing spray foam installation. However, it is unlikely to be approved due to the permanent nature of the foam and its potential to cause damage to the property.

Consumer rights

Under the Consumer Rights Act 2015 (CRA), the installation service must be performed with reasonable care and skill, be fit for purpose, and meet satisfactory quality standards. If the work is substandard, consumers will have the right to a repeat performance or a price reduction.

For information on how the CRA applies to goods and services, please see 'Selling and supplying goods' and 'Supplying services'.

Under the Digital Markets, Competition and Consumers Act 2024 (DMCCA), it is illegal for traders to mislead consumers by act or omission, or to engage in aggressive sales practices.

The DMCCA gives the Competition and Markets Authority (CMA) powers to determine whether consumer law breaches have occurred, and to impose fines and order firms to pay compensation to affected consumers.

For more information on the DMCCA, see 'Protection from unfair trading (criminal law)'.

The Act will also provide a way for consumers to make a claim themselves. However, this part of the Act is not yet in force; claims are currently still covered by the Consumer Protection from Unfair Trading Regulations 2008 (CPRs).

For more information on the CPRs, please see 'Protection from unfair trading (consumers' rights of redress)'.

The Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013 (CCRs) require that pre-contract information is presented to consumers before any agreement is finalised. For off-premises or distance contracts, they also provide consumers with a 14-day cooling-off period before any work commences; this is particularly important if carrying out door-to-door

or online sales of insulation services.

To find out how the CCRs affect your business, see:

- 'Consumer contracts: on-premises sales'
- 'Consumer contracts: off-premises sales'
- 'Consumer contracts: distance sales'

Record keeping

Homeowners should be provided with all paperwork related to the installation. This includes:

- contract details
- manufacturer's recommendations
- installation warranty
- independent test certificates (BBA / Kiwa)
- photographic evidence of the roof and timbers before, during and after installation

Spray foam insulation installation checklist

Pre-installation preparation:

- complete site survey. Assess structure, ventilation, moisture levels and suitability for spray foam
- advise homeowner to check with their mortgage provider before proceeding with installation
- consumer consultation and contract agreement. Discuss insulation type, coverage area and potential risks (for example, mortgage implications); obtain written approval
- confirm material. Choose between open-cell or closed-cell foam, based on thermal, acoustic and moisture needs
- review building regulations. Ensure compliance with the relevant sections of the building regulations for the appropriate nations of Great Britain, as well as other relevant building codes / standards

- put ventilation strategy in place. Plan for adequate airflow, both during and after installation
- complete health and safety risk assessment. Identify hazards and mitigation strategies
- check PPE and equipment. Confirm availability and condition of respirators, suits, gloves, goggles and spray rigs

Installation day procedures:

- secure area and put signage in place. Restrict access to work zone and display safety notices
- prepare substrate. Ensure surfaces are clean, dry and free of dust or oil
- activate ventilation. Use fans or extraction systems to maintain airflow
- apply spray foam in controlled layers. Follow manufacturer’s guidelines for thickness and curing time
- monitor temperature and humidity. Maintain optimal conditions for foam adhesion and curing
- manage waste properly. Dispose of empty containers and overspray according to environmental regulations

Post-installation checks:

- observe curing time. Allow sufficient time before re-entry or further construction
- complete visual inspection. Check for gaps, uneven application or thermal bridging
- reassess ventilation. Ensure long-term airflow is not compromised
- client walkthrough and sign-off. Review work with client and provide care instructions
- finalise documentation. Include installation report, product information sheets and warranty information

RELEVANT LEGISLATION

Title	Description / relevance
Building Regulations 2010 (for England and Wales)	Cover energy efficiency, moisture control and fire safety. See also Approved Documents B, C, F and L
Building (Scotland) Regulations 2004	Similar to the above, but for Scotland only. See also Technical Handbook Section 2 (Fire) and Section 3 (Environment)
Construction (Design and Management) Regulations 2015	Ensure safe planning and execution of construction projects
Health and Safety at Work Act 1974	Governs worker safety during installation, especially with chemical handling
Consumer Rights Act 2015	Covers both goods and services, which must be of satisfactory quality, fit for purpose, and as described. Applies to both the insulation product and the installation service
Digital Markets, Competition and Consumers Act 2024	Prohibits misleading actions and omissions, and aggressive sales tactics. Particularly relevant for high-pressure sales or exaggerated claims about spray foam benefits
Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013	Require clear pre-contract information. Provide a 14-day cooling-off period for off-premises or distance contracts. Particularly important for door-to-door or online sales of insulation services, but also cover dealings you have with consumers on your business premises

GUIDANCE DOCUMENTS

Title	Description / relevance
RICS Spray Foam Insulation Consumer Guide (2023)	Offers impartial advice on risks, benefits and property impacts. Highlights mortgage and ventilation concerns
IMA Code of Practice for Spray Foam Insulation (2023)	Sets out safe installation practices for high-pressure polyurethane foam
Government correspondence on moisture risk (2024)	Discusses moisture risks in timber roofs and regulatory concerns

STANDARDS

Title	Description / relevance
BS EN 14315-1: Thermal insulating products for buildings. In-situ formed sprayed rigid polyurethane (PUR) and polyisocyanurate (PIR) foam products - Specification for the rigid foam spray system before installation	Specifies requirements for factory-made polyurethane foam insulation products
BS 5250: Management of moisture in buildings. Code of practice	Provides guidance on moisture management in buildings, which is critical for avoiding condensation issues
PAS 2030: Installation of energy efficiency measures in existing dwellings. Specification / PAS 2035: Retrofitting dwellings for improved energy efficiency. Specification and guidance	Standards for energy efficiency retrofit work under Government schemes - for example, ECO

LEGISLATION ETC

The laws featured in this guide / update information

Trading Standards

For more information on the work of Trading Standards services - and the possible consequences of not abiding by the law - please see ‘Trading Standards: powers, enforcement and penalties’.

In this update

New guidance: September 2025

Key legislation

- Health and Safety at Work etc Act 1974
- Building (Scotland) Regulations 2004
- Consumer Protection from Unfair Trading Regulations 2008
- Building Regulations 2010
- Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013

- Construction (Design and Management) Regulations 2015
- Consumer Rights Act 2015
- Digital Markets, Competition and Consumers Act 2024

Please note

This information is intended for guidance; only the courts can give an authoritative interpretation of the law.

The guide’s ‘Key legislation’ links may only show the original version of the legislation, although some amending legislation is linked to separately where it is directly related to the content of a guide. Information on changes to legislation can be found by following the above links and clicking on the ‘More Resources’ tab.