

Response ID ANON-JH4Z-5RVK-8

Submitted to **Energy Efficient Scotland: Consultation**

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Pace of Delivery, Impact of pace on supply chain, Impact on Fuel Poverty & Climate Change

1 With regards to achieving an accelerated delivery of the standards proposed, do you think mandatory action for owner occupiers would be required? ? Please provide a rationale for your answer.

Yes

Comments::

Yes and No. We like the idea of encouragement prior to 2030 with support schemes/subsidies to help people better insulate their homes. At the same time, if government support the liquid fuel decarbonisation pathway then the fuel specification will change (by law) and thereby oil users will see a change in their carbon emissions due to the changing fuel specification with will compliment the efficiency improvements to the fabric of their buildings.

Flexibility within the standard will allow industry to adapt all aspects of technological innovation thereby the means for consumer to make cost competitive choices in meeting Government targets

Mandatory action may be required post 2030 if there is little take up or the subsidies are too small to make a significant impact.

2 What trigger points, e.g. sale, renovation, etc. could be used to require owner occupiers to undertake energy efficiency improvements?

Comments::

It is important to understand the very specific nature of the housing stock before determining any trigger points.

For example a large percentage of oil heating properties are pre 1919 and are solid wall design. This in turn sets a different criteria to how energy efficiency can be improved.

There are various trigger points

Sale of house

Planning permissions

Installation of new equipment eg new boiler or new liquid fuel tank

There may however be some situations where it would be more practical for a property to be sold prior to the necessary upgrades, for example ill health or death of the owners. It would then be incumbent on the new owners to undertake the necessary works prior to taking possession.

In its advice to the Government, the UK CCC identifies energy efficiency improvements, such as solid wall insulation, as having the potential to provide 8% of the reduction needed to reach the 2050 carbon emissions target. These improvements, when correctly installed, have the potential to improve comfort, remove damp and reduce fuel poverty. The UK CCC recommendations include a full housing condition survey (last carried out in 2007) and new low-carbon building standards to avoid costly retrofits in future.

3 If you think mandatory action would be required to achieve an accelerated delivery of the standards, when should mandatory energy efficiency targets be introduced in the owner-occupied sector

After 2030

Comments::

See answer to question 1

Government should consider a tiered approach to achieving the 2050 goals.

4 From a supply chain perspective, do you think bringing forward the timescales for the Programme would have a positive or negative effect on quality, skills & capacity and consumer protection?

Negative

Please provide a rationale, and evidence where possible.:

Negative. Consumer engagement is key but will take time unless you want households to make the wrong choice at the wrong time. Our members are very keen to help in communicating through the energy transition and already have contacts with those off grid.

Consumers should not be pushed in a direction by giving false and incorrect information, they should be given the chance to understand the true running cost, impact and benefits, on that basis a wider window should be allowed.

Infrastructure development will take several years to develop, design/implement and will be driven by market demand and/or regulator framework.

Similarly, re-training technicians and personnel in the supply chain needs to be completed properly so an unrealistic acceleration would have a negative impact.

5 In your view, how would accelerating Energy Efficient Scotland help, and/or how would it hinder, plans to address fuel poverty?

Comments::

27% of homes in Scotland are classified as fuel poor. (SOURCE: National Energy Action Sept 2018). That is a significant amount and it is why encouraging is the right initial path forward with significant monies set aside to support these households towards an EPC C home. Pre 1919 homes may be very difficult to retrofit. The two strategies need to be aligned. Decarbonisation will cost someone and it cannot cost those who are already fuel poor.

There is a risk in bringing the target date forward that technological innovations to reduce the cost of heating have not yet materialised within the market. This in turn may force homeowners to use interim solutions that may not be the most cost effective or energy efficient in the long term.

6 With regards to reducing the emissions associated with the supply of heat, what are your views on consideration of energy efficient improvements alongside changes to heating systems?

Comments::

Agree. Our Future Vision suggest that stage 1 of any pathway (on and off grid) should be to increase the efficiency of all homes through new equipment/systems, insulation, double glazing, smart controls and metering.

A joined up approach though is required alongside delivery partners to ensure alternative heating choices are available and realistic and practical information on these heating choices are available to the householder. This should apply to all households but particularly those in "off gas" areas, whether upgrading existing heating systems or installing renewable technologies.

Private Rented Sector

7 What are your views on using change of tenancy as a trigger to require the increased standard?

Comments::

Agree. Change of tenancy is an obvious trigger point as this will allow the Landlord time to implement measures without inconveniencing the tenant. For long standing tenants there may need to be date set by which renovations are implemented to bring a property up to the required standard.

8 What are your views on using 1 April 2025 as the date to start applying the minimum standard of C when there is a change of tenancy?

Comments::

It is an ambitious target. Success will depend on what support is available to make those changes.

The cost of bringing properties up to a C could be very costly for landlords, particularly those who have multiple properties. Good quality information and advice should be available outlining the most standard measures that are available and required to meet the standard.

The danger is that the date may be too early and landlords may decide not to rent the property again if there is a prohibitive cost thereby reducing available homes.

9 With regards to providing a useful tool to landlords planning and executing improvement works, what are your views on basing any cap of required works on a definition of cost-effectiveness and technical feasibility?

Comments::

Not our area of expertise. No comment

Impact on Supply chain: skills and capacity

10 The Short Life Working Group have made recommendations which they believe represent the actions required to ensure that Energy Efficient Scotland will achieve consistently high levels of quality, health & safety and consumer protection. do you agree? If not, what more or less should be done?

No

If not, what more or less should be done?:

Yes and No:

Whilst we agree with most of the recommendations made, we do have some concerns how this can be controlled/used to ensure the consumer is given the correct guidance/information, not miss sold and used for profit.

There is no indication as to how these would be implemented. Perhaps lessons can be learned from the MCS (Microgeneration Certification Scheme) where installers of renewables were certified but little or no follow up was undertaken to ensure quality of installation.

The engagement of all business regardless of size must be far to all, allow those at greater risk from government measures to develop and future proof the business

We also believe that FPS and OFTEC trade associations should have been involved within the SLWG and any future discussions to assist and give their expertise within those fields mentioned, being best placed how to address a number of consumer/quality issues, skill and training points.

Whilst building energy efficient is an excellent way of controlling emissions and reduction demand for energy, linking with the development of liquid fuels and new boiler technology would be the perfect answer for Scottish Government and the end consumers, help address running costs, be a natural drop without major disruption to the supply chain, still meet the environmental goals.

Whilst 'Quality Marking' is important to verify the product and supplier is to an acceptable level, this could be timely, costly. How will the costs be set out? will Government fund such a process? who will set the criteria?, this may restricted small business on financial grounds. It should not be used for companies to set an approval process that is costly and to the end consumer. Such as FORS and 9001/14001/18001

The development of approved supplier list may work, again who will control this? is should not be used for control contracts or profiting

11 Do you have any views on how this can be achieved whilst at the same time ensuring maximum participation from suppliers across Scotland regardless of their size and geographical location?

Comments::

See comments as previously stated relating to impact.

Any scheme should be simple to join to encourage engagement with small local suppliers – This could include funded or part funded training/certification.

Government funding should encourage future proof each business regardless of size, to give better understanding/knowledge, the development of apprenticeship/ skill sets and training in this type of field.

Government must set out very clear guidance and control measures for each local authorities to monitor the development of any energy efficient measures, including the quality of such work, however, this process must not be used to single out type of energy as the preferred option like ASHP as currently seen, consider how each area can best deliver these measure at a cost suitable to the end consumer, protect the consumer, the type of property involved and for those currently in Fuel poverty

12 What do you think the role of Scottish Government should be in ensuring the quality criteria are consistently met?

Comments::

Various options could be considered:

If an approved suppliers list is implemented, the development of code of practice, that all parties sign up too, monitored by Scottish Government and local authorities

All parties to be involved in the Alternative Dispute Resolution (ADR) to assist in any dispute for the consumer and supplier. link below:
<https://www.gov.uk/government/publications/alternative-dispute-resolution-for-consumers/alternative-dispute-resolution-for-consumers>

Heat Networks

13 Taking the previous questions into account, what further incentives or assistance could drive further heat demand onto networks?

Comments::

No comment

14 Taking the previous questions into account, what further assistance could support the growth of approximately-sited, low carbon heat networks?

Add your comments here:

No comment

About you

What is your name?

Name:

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Federation of Petroleum Suppliers

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Neither satisfied nor dissatisfied

Please enter comments here.:

It was limited. There are many others ways that energy efficiency can be improved (see our answer to question 6 yet there was no space to explore these in any detail. Yet there was a section on heat networks which does not sound like a technology neutral consultation that is focussed on the needs of the consumer.

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Slightly satisfied

Please enter comments here.: