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- Individual
- Organisation

Full name or organisation's name

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

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Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

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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
- No

1. Consultation Questions: Summary

Domestic Energy Performance Certificate Metric Reform Proposals

1. Do you agree with the set of metrics that we propose to display on the reformed EPC?

Yes/No/Don't know

Please provide further details here

Yes, subject to details of the methodology behind the metrics. We think that fabric, cost, heating system type, together with emissions and energy use, together cover key factors of interest for policy makers, householders and property owners. Having several allow householders and homeowners to make decisions based on several factors, and can be used by policy makers differently, depending on the policy. In the detail:

- Fabric: see comments and caveats in question 4
- Heating systems: we strongly recommend not to include heat networks within a single category. The rating MUST create incentives for 1) energy efficiency and 2) decarbonisation, and therefore there should be at least 3 bands, if not 4: 1) high efficiency and not on fossil fuels; 3) low efficiency and on fossil fuels; 2) either low efficiency or on fossil fuels (or split into 2 bands).

2. Are there additional metrics that you think should be included on the EPC, or metrics that you do not think should be included?

Should be included, please give reasons for your views

It would be useful to consider the inclusion of an indicator relating to demand management, or smart readiness. Potentially this could be a full "smart readiness indicator", but these are not yet fully developed. An intermediate solution could be to include several indicators as outputs from the same SAP methodology (e.g. estimated peak load, estimated storage capacity etc), and the benefits that smart tariffs could bring (compared to the "standard" tariff presumably used in the cost rating).

Should not be included, please give reasons for your views

3. Considering our proposal to include a Fabric Rating on EPCs, do you think this metric should include domestic hot water heat demand?

~~Should include, please give reasons for your views~~

Should not include, please give reasons for your views

The reasons are broadly as set out in the consultation paper: best keep it a metric focused on fabric i.e. where there are the biggest needs and opportunities to reduce demand; hot water can be covered by the cost rating, the heating system

type (at least in cases where hot water would come from the same system), the emissions rating, and the energy use indicator.

We would also add that, by including them in a single metric, not only would it dilute effects but it could create perverse incentives (depending on the methodology) whereby inefficient hot water storage & distribution systems increase hot water demand but contribute to reducing space heating demand: this would not truly encourage energy efficiency, neither for fabric nor for hot water systems.

4. Do you have a view on the way that the Fabric Rating mapped against a scale, for example, how 'A' or 'G' rated performance is determined?

Please provide further details here

From the BRE paper, we understand the fabric metric to be proposed as, broadly speaking, a space heating demand i.e. energy required to keep the space to given internal conditions. Our questions / comments are:

- Because space heating demand is virtually impossible to verify (as it is based on lots of standardised assumptions which will not be the same in practice e.g. internal temperatures and occupancy patterns), and because heat metering is quite uncommon, for this metric to be useful it is important that the methodology behind it (i.e. SAP) and the scale are robustly tested and validated: once in place, it is much more difficult to get real-life feedback on it than, say, total energy use.
- For this to be meaningful, it should take account of geographical location e.g. using the several locations already available from CIBSE weather files or the SAP geographical zones, not a single one.
- A rating may be suitable, as it will be easier for many householders to engage with than a number, but the number (i.e. space heating demand) should still be visible on the EPC, and fully accessible as part of the digital register, for use by those that do understand it e.g. researchers, practitioners, policy makers.
- We disagree with the proposed (indicative) scale in the BRE report, which seems largely based on the current distribution across the stock. For EPCs to meet their objective i.e. encourage retrofit and support Scotland's efforts towards Net Zero, then they must set a clear direction and reward buildings that are meeting energy efficiency levels compatible with net zero: the top ratings should be reserved for dwellings that truly meeting space heating demand in line with best practice, no longer needing retrofit, i.e. the space heating demand levels recommended by the CCC and broadly in line with Passivhaus. This will otherwise miss a significant opportunity to 1) highlight possible improvements, 2) reward these improvements.

5. Do you agree with our proposal to give more prominence to the energy efficiency features of the home (such as the depth of loft insulation)?

Please provide further details here

Yes, although in many cases this may be of limited use to householders and it would be better to 1) be clear there are opportunities for improvements, through the various metrics, and 2) point them to where proper advice on retrofit can be obtained.

Non-Domestic Energy Performance Certificate Metric Reform Proposals

6. Do you agree with the set of metrics that we propose to display on non-domestic EPCs?

Yes/No/Don't know

Please explain your view further

Broadly yes, and we agree that total energy use (not just regulated) should be part of it (with a breakdowns into energy supplies, if the building is not fully electric.

However:

- We do not understand the rationale for the energy rating being on a scale, relative to a reference building, and direct emissions being in kgCO₂/m²/yr. This could lead to odd trends which will be difficult to understand for building owners and tenants.
- We do not agree that this set of metrics “provides a holistic picture” of the performance of the building and opportunities to improve it, as it does not specifically heating & hot water systems - see question 7.

7. Are there any additional metrics that you think should be displayed, or any in the proposed set that should not be included?

Should have additional metrics, please explain your view further

Why not make heating & hot water systems one of the metrics, as for domestic buildings? In some non-domestic buildings this will be a very large part of the energy uses and emissions (e.g. student residences, care homes and hotels, with associated hot water use; schools), and there should be a clear incentive to decarbonise it.

See also question 2: considering a metric related to peak load and demand management.

~~Should not be included, please explain your view further~~

EPC Purpose and Validity

8. Do you agree with us that the primary role of the EPC should be to provide basic energy efficiency information for the purpose of comparison and act as a prompt to consider retrofit options?

Yes/No/Don't know

Please give details for your answer

Yes

9. If you disagree, or have further comments about the role of the EPC, please provide your comments.

Please give details for your answer

n/a

10. Do you agree that the validity period of EPCs should be reduced from 10 to five years?

Please give details for your answer

Yes, but we would also recommend considering requiring up-to-date ones at sale or purchase, whether or not the existing one has reached the end of its validity period: the previous tenant or owner may have changed elements such as heating systems or windows. As long as EPCs are digitised (see question 12), this should not place an unreasonable burden on the transaction, as it would simply be a matter of checking and updating the record.

11. We welcome any views on the usefulness of our proposals for other relevant policy areas, such as fuel poverty or the delivery of government schemes. Please provide any comments you wish to share.

Please give details for your answer

Digital and Accessible EPC Format and Content

12. Do you agree with our proposal that EPCs should move from PDF to webpage format?

Yes/No/Don't know

Please provide further details here

Yes – but the crucial point here is that they are digitised: it's not simply that the EPC (i.e. the output) should be available as a webpage, but that all its data inputs should be digitised and stored: this will make them accessible for building owners and tenants for interrogation and updates; and they can form part of a central register which is accessible for research and policy purposes. Nonetheless, they should still be easy to print on a page, for people who wish so (a non-negligible proportion of the population may otherwise find it difficult to access an online-only EPC).

13. Do you agree with our proposal to improve signposting to further support and advice schemes on the EPC?

Yes/No/Don't know

Please provide further details here

Yes in principle, although this will probably be of limited use if EPCs are only updated every 5 years, as advice and support schemes often have a shorter life, new ones get created etc. It would probably be better if EPCs pointed to a website, and that's what would be kept up to date.

14. Do you agree historical EPCs should be publicly accessible on the EPC register (while clearly marked as historic)?

Yes/No/Don't know

Please give reasons for your view

We do not see reasons not to, as long as they are heavily caveated. As noted in relation to questions 17 and 18, many EPCs are currently of notoriously low quality, so these ones may raise questions and not necessarily help stakeholders. Maybe this should be limited to EPCs going forward, from the point of this reform rather than older ones, so they are all on the basis of the same method, metrics, process etc, and reasonably comparable?

15. Do you agree that the EPC register should be accessible by API?

Yes/No/Don't know

Please give reasons for your view

CIBSE fully support this, for the reasons set out in the consultation document . this can become a very useful source for research and policy, and may help spot trends and opportunities for improvements not only to the building stock but to the EPC methodology and process.

16. Do you have any further comments on our proposals to move to a digital and accessible EPC?

This could include services that you think EPCs should signpost to, or comments about the use of an API to access the EPC database.

Please explain your view further

As per section 4.6 of the consultation: We recommend considering how to ensure the EPC register can become part of a wider ecosystem of building passports, including retrofit plan and actual energy use, which would help occupants, owners and policy makers to plan and monitor improvements over time. We would add that there are more UK activities around building passports and retrofit than identified at the time of the ClimatXChange report e.g. as part of the Green Home Finance Accelerator (funded by DESNZ) and the Optimised Retrofit Programme in Wales. We would be happy to provide more information and contribute to your work on this topic.

EPC Auditing and Assurance

17. Do you agree with our proposals to review and update the auditing and assurance requirements for EPCs in Scotland?

Yes/No/Don't know

Please explain your view further

18. Please detail any additional assurance activity that you think would be appropriate to enhance the accuracy and reliability of EPCs.

Please give details for your answer

Consultation Questions: Legislating for EPC Reform and Timeline

19. Do you have a view on our timeline for reform implementation?

Yes/No/Don't know

Please give details for your answer

We strongly encourage basing EPCs on the updated (upcoming) SAP:

- 1) The stated intend of SAP11 is to improve the assessment of energy use, which should make EPCs much more relevant (even if they are still based on a standardised model)
- 2) This will avoid introducing a first change in EPCs and shortly after a second one due to the change in SAP.