

Energy Efficient Scotland – Improving energy efficiency in owner occupied homes

Response from Energy Saving Trust

8 April 2020

RESPONSE SUBMITTED 8TH April 2020,

1. Do you agree or disagree that there should be a legally-binding energy efficiency standard for owner-occupied housing?

Yes, Energy Saving Trust agrees that there should be a legally binding energy efficiency standard for owner-occupied housing.

It is clear from the Scottish Government's analysis that was detailed in their Energy Efficient Scotland consultation of March 2019 that neither building as usual existing approaches nor business as usual existing approaches *plus* regulation at the point of sale will be sufficient to ensure the delivery of the proposed EPC C standard in all homes by 2040 let alone by 2030 (the later date being the date by which many stakeholders (including Energy Saving Trust) recommend that all homes need to reach an EPC C).

A legally-binding energy efficiency standard, that applies at a number of trigger points (for further details see our response to question 10 below) for owner-occupied housing, is clearly required to drive up minimum standards and to ensure that as many homes as possible are brought up to an EPC C standard.

There is also a clear need for the Scottish Government to significantly ramp up the support it provides to the owner occupier sector as soon as possible (before any regulatory requirements kick in) to ensure that business-as-usual rates of voluntary improvement are not only maintained but increased considerably. This is important not only because it will help to increase installation rates but also because the more successful the voluntary approach the less need there will be for regulation to apply extensively and regulation is unlikely to be popular.

2. Do you agree or disagree that EPC Energy Efficiency Rating band C is the appropriate standard to use? Please explain.

If the Energy Efficiency Rating is the rating that will be used (as opposed to the Environmental Impact Rating being an option) then we agree that EPC Band C is the appropriate standard to use. The Scottish Government committed, in their Energy Efficient Scotland route Map of May 2018, to all homes in Scotland reaching EPC C by 2040.

However, it is important that, were there is scope to improve properties beyond their regulated minimum standard households are aware of this and are encouraged to improve the energy performance of their homes as much as possible. To encourage people to go beyond the regulated standards the Scottish Government could, for example, provide grant funding to improve regulated properties beyond the standard.

It will also be important that people do not see any regulated minimum standard as the final step in their property's zero carbon journey but as a 'stepping stone' to net zero carbon. The solution necessary to meet a short-term target for energy saving (i.e. EPC C Energy Efficiency Rating) is not necessarily the best solution to build upon to meet a longer-term more ambitious net zero carbon target. Providing householders with a sense of the 'optimal' package of measures that will need to be installed over time will play a key role in ensuring the full potential benefits from the retrofit activity that will need to happen to meet targets is realised. Also, and perhaps more importantly, it will help to foster

consumer interest and engagement. Consumers will know what to expect/what they will need to do to their property over time and won't be 'surprised' when the need to undertake additional activity arises. If Home Energy Scotland advisors were also able to access (with the customer's permission) this type of information, it could enrich the advice they are able to provide to householders. In this context we support the Assessment Short Life Working Group's proposal that *'a homeowner should be provided with a tailored report of recommendations, setting a clear pathway to a warmer home, regulatory compliance and zero carbon.'*

As the consultation document notes there are some disadvantages to using the Energy Efficiency Rating, including that *'because of the current higher cost of many renewable fuel sources it is possible in some cases to make the EER worse even though the carbon emissions from the home have reduced.'*

We agree that there are a number of options that could help to ensure that carbon savings are maximised if the EPC Energy Efficiency rating is chosen as the appropriate rating, including those suggested in the consultation document. We have not undertaken relevant modelling so don't know which of those options would be the best way forward but both are likely to result in the delivery of greater carbon savings than would otherwise be the case. We also note that there are other options that have not been covered in the consultation document that we believe would merit further consideration (and analysis), these include:

- Requiring that the Environmental Impact Rating is made better by any works that are undertaken (as opposed to just not made worse as proposed in the consultation document).
- Using the Environmental Impact Rating as opposed to the Energy Efficiency Rating because this approach is likely to generate greater carbon savings and will provide a consistency of approach over the period to 2045 (when all homes should be net zero).

3. What are your views on the "fabric first" approach as described above?

Energy Saving Trust strongly supports the Scottish Government's intention to *'encourage a "fabric first" approach'*. As the consultation document notes, irrespective of how a home is heated improving its energy efficiency will mean it easier to heat, will help save its occupants money on fuel bills and ensure less energy is wasted. Energy efficiency is also a no regrets option for renewable heat and in particular will ensure that homes are suitable for heat pumps in the future.

4. In your view, how can we ensure that when EPCs are used to determine compliance with the standard, they are robust and not easily open to misuse?

Energy Saving Trust agrees that it is vital that when EPCs are used to determine compliance with the standard they are robust and not easily open to misuse. In order for this to happen we believe that there is a need not only for more and better compliance checks but also for consideration to be given to the level of qualification required by assessors – it is vital that EPC assessors feel that they are robust professionals, are impartial and are well rewarded.

In this context much can be learnt from experience elsewhere in Europe where EPCs are often more expensive than those produced in Scotland (and indeed in the rest of the UK) and where those producing them often require more qualifications than those producing them in Scotland (and indeed the rest of the UK). In Portugal, for example, Energy Performance Certificates are issued by 'qualified experts' who are either recognised architects or engineers with at least 5 years professional experience. To obtain the accreditation necessary to issue EPCs the expert must take an exam offered by ADENE, the Portuguese Energy Agency.

In Portugal random compliance checks of EPCs are done in two ways – basic checks and more detailed checks. The basic approach includes an automatic check of the data entered in the EPC registry, followed by a simple verification of the basic methodologies. The more detailed check entails a full-data review of calculations and an on-site visit, to test compliance with requirements and methodologies. The compliance checks are performed on a random sample of EPCs.

In terms of compliance we also believe that there is the potential to better use existing data to help identify inaccurate EPCs. For example, systems which would help to identify ‘outlying’ EPCs – for example if in a street where all properties were 1950 cavity wall homes there was a property with an EPC of A this could be identified and would raise suspicions. However, this type of approach, while very useful will only work at extremes and additional means of checking accuracy are required and must be more sophisticated than a desk-based review of an entire assessment.

5. Do you think the standard should be fixed, or should it be subject to periodic review and change over time? Please explain your view.

As noted above EPC C needs to be seen as a stepping stone to net zero carbon. In addition, the environment within which the standard operates will not remain static – for example prices of different measures and heating systems will change over time, there will be technological innovations, etc. and as such it makes sense to build in periodic reviews to ensure that standards are still appropriate within the wider environment they operate in.

6. Do you agree or disagree that 2024 is the right start date for the mandatory standard to start operating? Please give your reasons, whether you agree or disagree.

Energy Saving Trust believes that the mandatory standards should start operating no later than 2025. This view is based on the analysis presented in the Energy Efficient Scotland consultation document of March 2019 (and referenced above) together with the Scottish Government’s most recent commitments on climate change – specifically that Scotland has net zero greenhouse gas emission by 2045 which taken together imply the need for regulation to begin to apply no later than from 2025.

7. Do you agree or disagree with point of sale as an appropriate trigger point for a property to meet the legally binding standard?

Energy Saving Trust agrees with point of sale as an appropriate trigger point for a property to meet the legally binding standard.

The point of sale is an obvious trigger point for owner occupiers to undertaken energy efficiency improvements with a requirement for improvements to be undertaken by the seller before the sale of the property or passed on the buyer to undertake within 12 months of purchase.

As we discuss below it will also be necessary for standards to be applied, not only at the point of sale but also at other trigger points.

8. Do you agree or disagree that responsibility for meeting the standard should pass to the buyer if the standard is not already met at point of sale, as described above? Please explain your views and give any evidence you have, whether you agree or disagree.

Energy Saving Trust agrees that responsibility for meeting the standard should pass to the buyer if the standard is not already met at the point of sale, as described in the consultation. It seems unreasonable to penalise those who, for whatever reason, are unable to improve the energy performance of their homes before the sale of that home. Allowing the buyer to undertake the work may also mean that work beyond the minimum standard is more likely to be undertaken at the same time. The buyer is the one that will be living in the home on an on-going basis and as such they are

more likely to have an interest in the comfort and fuel bills of the property. The seller on the other hand may just want to do what is necessary to sell their property and as such may just do the bare minimum to meet the regulatory standard. There is also a risk that upgrades installed by sellers are ripped out after sale by buyers – particularly those who undertake some renovation work (for example, loft insulation would be taken out in the case of a loft extension being put in), so it is vitally important that the buyer is allowed to undertake the work.

It is important however that there is, as the consultation suggests, a time limit in which to bring the home up to the required standard. We do not believe that any time limit should be greater than 12 months. This is because allowing all sellers to pass the responsibility for energy improvement works to the buyers will delay all regulated energy saving activity at a time when there is an urgent need to reduce emissions.

9. What, if any, unintended consequences do you think could happen as a result of these proposals? For example, any positive or negative effects on the house sales market.

We would like to use our response to this question to highlight that any potential negative impacts on the housing market could be mitigated to a greater or lesser extent by ensuring that it is as simple and straightforward as possible for people to work out what work needs to be undertaken to that property, and as easy as possible for householders to get the work done to a high standard. It is therefore important that sufficient resources are directed at relevant support services to allow this to happen.

10. Do you agree or disagree with point of major renovation as an appropriate trigger point for a property to meet the legally-binding standard?

The EES consultation from March 2019 noted that *‘over a ten year period a requirement for improvement triggered at the point of sale would only capture around a third of the stock falling below EPC Band C’* and will *‘still leave a backlog of dwellings needing to be upgraded in 2040, even if regulation begins in 2025 instead of 2030’* so it is clear that regulatory requirements at additional trigger points will be required and we agree that the point of major renovation is an appropriate trigger point for a property meet the legally-binding standard.

We also agree that, as suggested in the consultation document, a regulatory requirement at the point of major renovation *‘may also help to encourage mainstream construction trades to bring energy efficiency measures and awareness more fully to their standard set and range of services offered’*.

It would be helpful to have data outlining how many homes in Scotland undertook major renovations per year – using the definitions in the consultation paper, and the potential impact that any regulatory impact at this trigger point could have. This data together with data analysing impacts of regulation at the point of sale together with business as usual improvements could be used to determine whether these actions taken together would deliver the necessary levels of improvement to ensure that the housing sector contributes appropriately to emissions reductions targets.

We suggest that the Scottish Government should also consider other trigger points, including:

- When there is a change of building use
- Where a boiler or heating system is replaced

We also think that further consideration needs to be given to trigger points for energy efficiency works to common areas of flats (noting that the common areas may include e.g. external walls where insulation is most readily applied). Regulation could for example include:

- Require works to communal areas of flatted buildings at certain points e.g. when area-based schemes offer support and when fuel poor residents would otherwise not benefit from improvements etc.
- When the tenement co-owners are undertaking other whole building actions – e.g. structural works or roof repairs.
- Where more than half the EPCs for the flats in the building have a rating below D.

Time-based trigger points (i.e. requiring properties to be improved by a certain date) could have an important role to play here too and consideration should also be given to whether or not a backstop date for meeting standards in the owner occupied sector is a workable option.

11. What is your view on how “major renovation” should be defined? Should the Energy Performance of Buildings Directive definition, as described in Annex B, be used? Please explain.

Our views on the Energy Performance of Buildings Directive definition of ‘major renovation’ are detailed below:

(a) the total cost of the renovation relating to the building envelope or the technical building systems is higher than 25 % of the value of the building, excluding the value of the land upon which the building is situated

Given the significant variation in property prices across Scotland we do not believe using a definition based on a % of the value of the building would be an equitable approach to take. Research from 2018 highlighted the difference between the cost of property across Scotland on the basis of property size (in m²). It showed that the difference in cost between the most expensive town in Scotland (£2,669 per m²) and the least expensive town in Scotland (£1,016 per m²) was £1,653 per m²¹.

So, for example a property that is 67.8m², in the least expensive town for property in Scotland would be subject to a regulatory requirement if the renovation work cost over £17,221 while a property of the same size in the most expensive town would be subject to a regulatory requirement if the renovation work cost over £45,239.50, i.e. the person living in the most expensive town would be able to undertake an additional £28,028.50 before any regulatory requirement kicked in.

(b) more than 25% of the surface of the building envelope undergoes renovation

We note that this option may have more of an impact on smaller properties (i.e. more smaller properties than larger properties may be required to undertake energy performance upgrades if this definition of major renovation is used). As a result, again, this may not necessarily be the most equitable of approaches.

On balance we believe that any definition of major renovation should be broadly based on the area/scale/cost of the works and we think that the Scottish Government need to do some additional work here to look at a wide range of alternative options.

¹ See: <https://www.scottishhousingnews.com/article/price-per-square-metre-of-scottish-homes-unveiled-in-new-report>

² See: <https://www.which.co.uk/news/2018/04/shrinking-homes-the-average-british-house-20-smaller-than-in-1970s/>

In this context we also support the Existing Homes Alliance's conclusion that a more comprehensive range of trigger points related to repair, maintenance and improvement (RMI) would be preferable to relying only on the definition of major renovation.

12. How could a requirement to meet the energy efficiency standard at point of major renovation be checked and enforced? Who should be responsible for this?

Enforcement is not a key area of our expertise. However, we note that Scotland, through the building control system, has an existing enforcement regime around people undertaking building works – it would seem to make sense to take advantage of this existing mechanism, although it may be necessary to widen the scope of what is notifiable (to align with decisions about the definition of 'major renovation').

In terms of checking that the required work had been undertaken one option might be to require an EPC after the work has been undertaken. This approach is used in the loan schemes that Energy Saving Trust manages on behalf of Scottish Government and is an efficient way of verifying that a measure is in place.

13. What do you think would be a fair and appropriate method to ensure compliance, if the legally binding standard is not met? What type of penalty system would be appropriate? Please explain.

As we have noted in responses to previous consultations if owner occupiers are mandated to improve their properties then this should be accompanied by financial penalties for non-compliance. It will be important that the costs associated with non-compliance are greater than the costs associated with compliance.

We also believe consideration should be given to whether a seller should legally be able to complete a sale if there is not an agreement in place that the requirement will be passed to the buyer or proof that the work has already been undertaken (or there is an exemption in place) by the seller.

14. Should a penalty for failing to comply with the standard be one-off or recurring?

We believe that any penalty for failing to comply with the standards should be recurring. Such an approach should minimise the number of people who are willing to 'take the financial hit' for not undertaking required work on their property.

15. At what level, approximately, should any penalty be set?

We do not have a view on the approximate level that any penalty should be set at. However, as noted above we believe that it will be important to ensure that the costs associated with non-compliance are greater than the costs associated with compliance.

16. Are there any particular groups of people who could be adversely affected, more than others, by enforcement processes and charges?

No response.

17. Which body or bodies should check if the standard has been complied with at the trigger point, and should be responsible for levying any penalty?

We believe that local authorities should be responsible for checking that the standard has been complied with at the trigger point. Local authorities should also be responsible for levying any penalty in all cases. However, it will be important that local authorities are adequately resourced to undertake any additional work associated with new regulatory requirements for owner occupiers.

18. Considering the information above and in Annex D, what are your views on the best way to approach cost effectiveness, taking into account the trade-offs between how easy to understand and how sophisticated different definitions are, and how the different definitions might affect the number of homes that actually achieve the EPC C standard?

Our views on cost-effectiveness are outlined in our response to the EES consultation of March 2019, where we argued for a more nuanced approach to cost effectiveness than had previously been suggested. In particular we suggested that *'for measures that are socially - but not individually – cost-effective our view is that it is reasonable to expect home owners to install the measure(s), paying for the measure up to the point which pays back for their home and being required to take advantage of any public support that is available to cover the remainder of the cost (in other words the cost of the measure is socialised to the extent that it is cost effective socially but not individually)'*.

We also believe there is merit in considering the proposal from ExHA that *'cost-effectiveness should not be used as a condition for the obligation to achieve a minimum energy efficiency standard – rather as a trigger for additional support, where relevant'*.

19. Other than technical feasibility and cost effectiveness, are there any other reasons why a homeowner may not be able to bring their property up to EPC C at point of sale or renovation, and would need to be given an exemption or abeyance? (For example, difficulties of getting permission from other owners for common parts of buildings.) Please explain.

There are a number of reasons why a homeowner may not be able to bring their property up to EPC C at the point of sale or renovation including, as referenced in the question difficulties associated with getting permission from owners for common parts of buildings. Other potential reasons include:

- If a property is in need of major renovation and any improvements made would need to be ripped out as part of the wider renovation (a simple example could be in the case of loft insulation needing to come out if a loft extension was added as part of a renovation project)
- If a property is being sold by executors of an estate, it may not be appropriate or realistic to expect that that this work can be done by the seller.
- Situations where getting the work undertaken by cause undue upheaval (in the case, for example, of older and/or more vulnerable people).

20. Do you agree or disagree that, even if a property can't fully meet the standard, it should be required to get as close as possible to it?

Energy Saving Trust agrees that, even if a property can't fully meet the standard, it should be required to get as close as possible to it.

21. Do you agree or disagree that any exemptions or abeyances from the standard should be time-limited?

Energy Saving Trust agrees that any exemptions or abeyances from the standard should be time limited.

22. Which body or bodies should take decisions about granting abeyances? Should this be done at a local level or centrally at a national level?

Again, this largely falls outside our core area of expertise. However, if a decision is taken to do this at a local level we believe that it will be important for standardised guidance, processes and national databases to be used wherever possible. This will save both time and resources for local authorities

as it will avoid having to develop processes and databases from scratch in each of Scotland's 32 local authorities.

23. The SLWG on Assessment propose that any new assessment regime should exist on two levels, comprising both a mandatory asset based assessment and an optional occupancy-based assessment. What are your views on this approach? Do you agree that an occupancy assessment should be optional? Are there specific inputs that should be included in both? Please explain your answer.

Energy Saving Trust agrees that the SLWG's proposal that any new assessment regime should exist on two levels, comprising both a mandatory asset based assessment and an occupancy based assessment is a sensible one.

We agree that an occupancy assessment should be optional. This is because one of the key points at which an assessment would be undertaken is at the point of house sale. An occupancy assessment makes little sense at this point because those having the assessment done are not those who will be living in the property once it has been sold.

We are also conscious that some householders may not want their personal data being stored and this is their right - it should not therefore be mandatory for them to have an occupancy based assessment.

There are number of specific inputs that we think that should be included in both a mandatory asset based assessment and an optional occupancy-based assessment, these include:

- All building related information.
- Whether there are any forthcoming district heating schemes.
- Local grid constraints - it would make sense to be able to consider whether the DNO had put a limit on what could be connected or not.
- Actual fuel bills/smart meter data where available.
- Smart export guarantee tariffs.
- Any sort of RHI replacement.

24. The SLWG on Assessment propose that the output of the assessment should be a report with tailored recommendations that set a clear pathway to both regulatory compliance (i.e. EPC band C) and zero carbon. There are conflicts between meeting the EPC rating and zero carbon. What are your views on how this can be handled/mitigated? Please explain your answer.

Energy Saving Trust supports the SLWG on Assessment's proposal that the output of the assessment should be a report with tailored recommendations that set a clear pathway to both regulatory compliance (i.e. EPC band C) and zero carbon.

However, doing so will not necessarily be straightforward because, as the consultation notes, *'...because of the current higher cost of many renewable fuel sources – it is possible in some cases to make the Energy Efficiency Rating worse even though the carbon emissions from the home have reduced.'*

It is important that people are provided with information about which options are the lowest carbon options – there may even be scope for the Scottish Government to provide additional incentives to encourage people to choose the lowest carbon options. Should people choose to install an

improvement that wouldn't result in as big an EPC improvement as a higher carbon option it is important they are able to do so without being penalised.

In this context and as noted earlier in our response it is also important that people see any regulated minimum standard as not as the final step in their property's zero carbon journey but as a 'stepping stone' to net zero carbon, and we support the Assessment Short Life Working Group's proposal that *'a homeowner should be provided with a tailored report of recommendations, setting a clear pathway to a warmer home, regulatory compliance and zero carbon.'*

25. The new assessment proposals from the SLWG on Assessment include more of an advisory role for the assessor. What are your views on the additional skills and training required to deliver this role? Are existing Domestic Energy Assessors best placed to provide the tailored recommendations? What risks and conflicts do you foresee and how would you propose to mitigate them? Please explain your answer.

If assessors are to take on more of an advisory role we believe it would make sense for consideration to be given to providing them with the same level of training as Home Energy Scotland advisors or indeed, depending on the depth of advice they are likely to provide, to the same level as the Home Energy Scotland specialist advisors. Doing so will ensure, not only that householders receive the best possible advice but also that advice provided by assessors is consistent with that provided through Home Energy Scotland. This will be important if consumers are to trust the advice provided.

26. The SLWG on Assessment propose that the tailored recommendations to improve energy efficiency and achieve zero carbon should consider the legal designation of buildings, obvious defects or condition issues, and local costings. Do you foresee any liability issues in this approach and if so, what suggestions do you have to mitigate them? Do you believe the inclusion of local costings to be practical and what are your thoughts on what level should be considered 'local'? Should the local cost of energy also be considered? Please explain your answer.

We agree with SLWG's proposal that the tailored recommendations to improve energy efficiency and achieve zero carbon should consider the legal designation of buildings, obvious defects or condition issues, and local costings.

Potential liability issues and mitigation

It is unreasonable to assume that the information provided by assessors will be 100% correct 100% of the time. The information provided in any assessment about the legal designation of a building, defects and condition issues should be seen as indicative only. It is therefore important that the onus is placed on the householder to check the information provided before undertaking any work as a result of an assessment. Householders should be provided with details about the relevant authorities they need to get in touch with about their properties' legal designation before progressing any work. In relation to any obvious defects or condition issues householders should be told that they need to get relevant professional/expert advice. People need to rely on professional installers to identify if there are any issues regarding installation of particular improvements.

Inclusion of local costings

Energy Saving Trust agrees in principle that local costings should be used wherever possible. Without such an approach many householders will not have a clear sense of the likely cost implications of any work that is required.

We note however that, depending on decisions about cost effectiveness, such an approach could lead to less work being required in homes where work is more expensive than in homes where work is less

expensive. It may be appropriate for subsidies to be provided in areas where work is more expensive to ensure that the rate of improvement to the housing stock in these areas does not fall behind those areas where it is cheaper to undertake work.

There is also a risk that this approach could influence the prices contractors quote and the work they undertake. So, for example, a heat pump installer may provide a realistic quote of £10k for an installation but the range included in the assessment suggests installations for that area should be no more than £6-8K. There is then the risk that the installer either loses the work or takes on the work and adapts prices to fit in with expectations meaning that something 'has to give' with the installation – and could for example lead to the installation of an undersized heat pump.

It is therefore important that any decisions about the use of local costing consider how such scenarios will be dealt with.

What level should be considered 'local'

In order to inform our response to this question we asked the Home Energy Scotland specialist advisors for their views. The advisors have detailed knowledge of the issues faced within the localities in which they work. From the responses received there was a general consensus that it would, ideally, make sense to do this at a sub-local authority level. Some local authority areas cover mainland areas and island areas and as such the cost of installation can vary considerably within them. North Ayrshire council for example covers some parts of mainland Scotland but also island areas, including the Isle of Arran. On the Isle of Arran a team of installers would need to stay overnight and this would be reflected on the customer's quote along with the cost of transportation. The specialist advisors have suggested that a typical air source heat pump installation on the island is typically at least £1000 more than the same installation on the mainland.

Data from the Home Energy Scotland loan scheme might also provide some useful insight when considering what level should be considered 'local' as it will allow the analysis of installation costs for different measures in different areas of Scotland.

Local cost of energy

No response

27. The SLWG on Assessment propose that the assessment should provide a theoretical indication of whether recommendations are technically feasible. Please provide your views on who should determine actual technical feasibility? Should this be a qualified installer or someone else? Please explain your answer.

Energy Saving Trust agrees that the assessment should provide a theoretical indication of whether recommendations are technically feasible. We believe that a qualified installer should determine actual feasibility. This is because they will have the relevant training and expertise to understand what is involved in the installation of the improvement and where there may be issues to do with the building or otherwise that may prevent it from being a successful installation. Qualified installers should also be working to the standards set by their industry.

28. In your view, what are the most important considerations for homeowners who are required to meet the legally-binding standard, in relation to skills, supply chain, consumer protection and quality assurance?

The key considerations for homeowners are: consumer confidence that the measures are appropriate to their home, the measures are fit for purpose and reliable, designed appropriately and installed by operatives who have the appropriate skills for their trade and who work to industry standards. The

skills of the assessors, designers and installers are therefore of paramount importance for Energy Efficient Scotland. However, in addition to that, protections need to be in place should any link in the supply chain fail. For example by ensuring designers have indemnity insurance and installers use products that come with a manufacturer warranty as well as a workmanship warranty which is also backed up either by insurance or by a trade body to ensure that consumers have redress even if the original company ceases to trade. Finally, as added protection we believe independent inspections of the work need to be carried out and should the work be deemed unsatisfactory then the supplier should be required to rectify it. If there are frequent non-compliance issues then there needs to be robust enforcement including the removal of suppliers from any approved, public facing, supplier directory.

29. What are your views on how the Quality, Skills and Consumer Protection SLWG recommendations specifically have an impact on the owner occupied sector? Please explain.

We generally agree with these recommendations and we have already responded to these through a previous consultation.

30. In your opinion, is this the right range of Scottish Government financial support schemes? Are there any gaps, regarding either types of financial product or groups of people who may be excluded from being able to access products? Please explain your views.

It is important that a wide range of financial support schemes are available to suit all consumers and their needs. With the introduction of regulation the availability of appropriate finance will be particularly important to ensure compliance with standards and to help avoid significant backlash against regulation. We do not believe that there are a significant gaps regarding either types of financial product or groups of people who may be excluded from being able to access products.

31. Do you agree or disagree that grant funding from the public purse should be focused on households who are vulnerable or in fuel poverty? Please explain if you disagree.

In principle Energy Saving Trust agrees that grant funding from the public purse should be focussed on households who are vulnerable or in fuel poverty. It is important to ensure that those who cannot pay for measures upfront or who cannot pay for measures over the lifetime of a loan are not penalised.

However, we note that those benefitting from the measures (i.e. the buyers) will not necessarily be in fuel poverty which raises questions about whether this is the best use of public funds. In such cases it may make more sense for any obligation to be passed to the buyer. On-bill financing could also have a role to play here as could short term bridging loans where there is substantial equity in a property.

32. In your opinion, what sources of non-government, private sector support are people most likely to want to access? (e.g. from banks, building societies, credit unions, mortgage providers).

As noted above we believe it is important that there is a wide range of financial products available. We do not have any qualitative or quantitative data about the sources of non-government, private sector support that people are most likely to want to access – and we note that this is perhaps an area that would benefit from consumer research.