

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's historic and contemporary built environment. BEFS is a member of the [Climate Heritage Network](#) steering group.

This consultation on the proposal to reform the current Energy Performance Certificate (EPC) as part of the draft Heat in Buildings Strategy, is welcome.

Other relevant consultation responses can be seen below, as many issues overlap and demand associative consideration:

[Consultation on Scottish skills requirements for energy efficiency, zero emissions and low carbon heating systems, microgeneration and heat networks for homes](#)

[Draft Heat in Buildings Strategy, Achieving Net Zero Emissions in Scotland's Buildings Consultation](#)

[Housing to 2040](#)

### **1. Do you agree or disagree with the addition of the proposed Energy Use Rating?**

Agree

BEFS is broadly supportive of the addition in that it is line with changes outlined in *Making SAP & RdSAP 11 fit for Net Zero* report of June 21, and as part of the Scottish Government's wider draft Heat in Buildings Strategy to reduce energy used for heating homes to meet Scotland's climate change targets.

### **2. Do you agree or disagree with the name changes of the current EPC Energy Efficiency Rating & Environmental Impact Rating to Energy Cost Rating and Carbon Emissions Rating respectively?**

BEFS does not have a strong view, however these changes would appear to be in line with language currently used around climate and carbon targets.

### **3. Do you agree or disagree that the proposed EPC format will better equip building owners and/or occupiers to make informed decisions about improvements and/or changes to the energy efficiency and heating systems of their building?**

Disagree

Whilst any additional information or system that aids clarity around decision making for building owners and/or occupiers is welcome, BEFS notes that the proposed format includes recommendations which do not adequately address the issue that current EPC baselines for traditionally constructed buildings are not reflective of their real-world performance. There is therefore a risk of unneeded interventions being undertaken, based on inaccurate data and confusing information.

## Domestic Energy Performance Certificates (EPC) reform: consultation

06/October/2021

BEFS has frequently lobbied for skilled, green employment in relation to this work, in line with the Scottish Government's Heat in Buildings Strategy, and notes the potential for unintended consequences of recommended improvement measures, many of which occur due to traditionally constructed buildings not being accurately assessed (and therefore not receiving appropriate interventions) within the current EPC assessment process.

This new format does not appear to reflect these potential issues or recognise that adverse or incorrect adaptations of traditionally built properties can fail to improve their energy performance; we therefore consider that it does not fully equip building owners and occupiers with the necessary information for informed decision making.

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#### **4. Do you agree or disagree with retaining the information outlined in section 5? Please explain the reasons for your answer.**

As above, BEFS considers that the assessor skills are a crucial part of what information is provided to building owners and/or occupiers, including identifying suitable materials and installation skills.

#### **5. Do you think any additional information should be added to the EPC format? Please explain the reasons for your answer.**

No response given.

#### **6. How do you think the metrics should be presented on the EPC?**

BEFS advocates for making all information and data provided as accessible as possible.

#### **7. Are there any other comments on the proposed EPC format you would like to add?**

BEFS strongly supports the drive to improve the energy performance of Scotland's homes, including traditionally built properties. The inefficiencies of the EPC in relation to traditional buildings has been raised previously and BEFS would reiterate that the existing built environment is the most sustainable building resource we have, through the embodied energy present, and the potential for adaptation and reuse. Assessed appropriately our existing built environment presents an enormous opportunity to provide climate solutions, as traditional properties form a fifth of Scotland's overall housing stock.

BEFS considers that any changes to the EPC should reflect the embodied carbon inherent in existing and historic properties. Additionally, we consider that as traditionally constructed buildings and modern constructed properties differ in how they function, a more nuanced approach should be incorporated into any plans to change EPCs.

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BEFS responses to a number of Consultations in relation to the Built Environment can be found at:  
<https://www.befs.org.uk/resources/consultations/>

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### RESPONDENT INFORMATION

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Responding on behalf of an Organisation - **BEFS** (Built Environment Forum Scotland)

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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**

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy. **I CONSENT**