

**Delivering Net Zero for Scotland's Buildings:  
Heat in Buildings Bill**  
SNIPEF Consultation Briefing

## Purpose of Consultation

Scotland has a legal target to reach 'net zero' greenhouse gas emissions. The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 requires the nation to reach net zero by 2045, as well as to achieve a 75% reduction in emissions by 2030 and a 90% reduction in emissions by 2040.

There is no way to meet our legal obligation to reach net zero without changing the heating systems in the vast majority of our buildings. Some households and businesses are already doing this, with around 5,000 people per year installing heat pumps and around 33,000 buildings connected to heat networks.

This consultation provides an overview of Scotland's strategy to reduce greenhouse gas emissions from buildings to meet its net zero target by 2045. It emphasises the necessity of transitioning from fossil fuel-based heating systems to low or zero-emission heating solutions, such as heat pumps and heat networks.

The consultation outlines legislative proposals and measures aimed at accelerating this transition, including setting targets for energy efficiency and the phased prohibition of new fossil fuel heating systems. It also discusses the importance of public engagement and the need for financial and advisory support to enable homeowners and businesses to adopt these new technologies.

The Scottish Government is inviting responses to its consultation by **8 March**.

## Delivering Net Zero for Scotland's Buildings

**Issued:** 28 November 2023

**Closing:** 8 March 2024

 [Official consultation page](#)

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### Consultation Summary

The following serves as a reference guide summarising the Scottish Government's consultation document. For comprehensive commentary and details, please refer to the [Delivering Net Zero for Scotland' Buildings](#) consultation document.

Pt.	Commentary	Page Ref
	<b>Chapter One: Executive Summary</b>	<b>6-12</b>
	<b>Chapter Two: The Heat in Buildings Standard</b>	<b>13-29</b>
	<b>Heating and energy efficiency</b>	
1	<p>There are two ways to reduce emissions within a building:</p> <ol style="list-style-type: none"> <li>1. Reduce our demand for heating and hot water by <b>installing energy efficiency measures</b> like insulation and better draught proofing. This is effective but will not remove emissions from the heating of buildings.</li> <li>2. <b>Use zero direct emissions heating systems</b> to heat homes and provide hot water. These systems – such as heat pumps and heat networks – don't produce any greenhouse gas emissions at the point of use. Modern, efficient electric storage heaters can also perform the same role, as can wet electric heating, and other direct electric heating technologies.</li> </ol>	<b>13</b>
2	<p><b>Prohibition on polluting heating after 2045</b></p> <p>The government estimate that around 89% of homes and 49% of non-domestic premises are using polluting heating at present, while around 55% of homes do not meet what is considered a good level of energy efficiency</p>	<b>14</b>

	<p>To reach net zero, all buildings will have to move from polluting systems to clean heating. The government proposes a new Heat in Buildings Standard to:</p> <ol style="list-style-type: none"> <li>1. Prohibit the use of polluting heating from <b>2045</b></li> <li>2. Require homes to meet a minimum energy efficiency by <b>2033</b></li> <li>3. Require landlords to meet minimum energy efficiency standard by <b>2028</b></li> </ol>	
<b>3</b>	<p><b>Statistics: Housing</b></p> <ul style="list-style-type: none"> <li>• 62% of homes are owner occupied</li> <li>• 24% socially rented</li> <li>• 14% privately rented</li> </ul> <p><b>Statistics: House Heating</b></p> <ul style="list-style-type: none"> <li>• 2M mains gas</li> <li>• 262K electricity</li> <li>• 129K oil</li> <li>• 34K district heating</li> <li>• 18K LPG</li> <li>• 20K coal</li> <li>• 16K biomass</li> </ul>	<b>15</b>
<b>4</b>	<p><b>Which clean heating system will depend on the suitability of the building.</b></p> <p>The government propose prohibiting polluting heating for main heating systems to promote decarbonisation in most homes while safeguarding rural areas from potential disruptions caused by storms and grid failures. This approach allows emergency backup heating systems, such as portable bottled gas heaters, to remain available for resilience in communities as needed.</p> <p>The government proposes an earlier deadline for private landlords to meet minimum energy efficiency standards in alignment with its 2021 Heat in Buildings Strategy and statutory 2021 Fuel Poverty Strategy. The goal is to ensure that tenants have warmer, more cost-effective homes, addressing fuel poverty while also improving property quality for landlords.</p> <p>Recognising the significance of privately rented homes in Scotland's housing stock and the challenges within this sector, the government initially planned to regulate energy efficiency in 2019 but postponed due to the impact of Covid-19. The government remains committed to engaging with the sector and considering the broader context in which it operates.</p>	<b>16-19</b>
<b>5</b>	<b>Setting the minimum energy efficiency standard</b>	<b>20-25</b>

	<p>The government proposes to set a minimum energy efficiency standard that can be met by installing a straightforward list of measures:</p> <ul style="list-style-type: none"> <li>• 270mm loft insulation</li> <li>• Cavity wall insulation</li> <li>• Draught proofing</li> <li>• Heating controls</li> <li>• 80mm hot water cylinder insulation</li> <li>• Suspended floor insulation</li> </ul> <p>Any homeowner who had installed these measures – or as many of them as are feasible for the type of home they live in – would be considered to have reached a good level of energy efficiency and meet the new standard.</p> <p>While many homes will have to make no improvements to meet the standard many of those that do will only need to install one or two measures. As set out above, we propose that any homeowner who has installed the List of Measures – or as many of them as are feasible for the type of home they live in – would be considered to have reached a good level of energy efficiency and meet the new standard.</p> <ol style="list-style-type: none"> <li>1. <b>Owner-occupied homes transitioning</b> to clean heating methods by <b>2033</b> are exempt from the minimum energy efficiency standard but are encouraged to invest in energy efficiency.</li> <li>2. <b>Private rented properties</b> with clean heating systems still need to meet the minimum energy efficiency standard since tenants typically can't make improvements.</li> <li>3. <b>Properties not meeting the energy standard by the end of 2028</b> in the private rented sector can't be leased to new tenants if the existing tenant leaves, but there are no sales prohibitions.</li> <li>4. No minimum energy efficiency standard for <b>non-domestic buildings</b> due to their diversity. Transitioning to clean heating systems is expected to drive energy efficiency investments.</li> <li>5. The <b>social rented sector is not covered</b> by the Heat in Buildings Standard, but it will align with a similar pathway. Social housing accounts for a significant portion of Scotland's homes and has made progress through the Energy Efficiency Standard for Social Housing (ESSH).</li> </ol>	
<p><b>Q1</b></p>	<p><b>To what extent do you support our proposal to prohibit the use of polluting heating systems in all buildings after 2045?</b></p> <ul style="list-style-type: none"> <li>• <b>Strongly support</b></li> <li>• Somewhat support</li> <li>• Neither support or oppose</li> </ul>	<p><b>26</b></p>

- Somewhat oppose
- Strongly oppose
- Don't know

**Additional commentary from SNIPEF**

The Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF) wholeheartedly endorses initiatives that contribute to global carbon emission reduction and climate change mitigation efforts. The commitment to move towards non-polluting heating systems by 2045, while commendable for its ambition, must be underpinned by the availability of viable, affordable alternatives. It is imperative that this transition is underpinned by robust support for households and businesses, coupled with incentives that ensure a fair transition, safeguarding against undue burdens on vulnerable communities.

Furthermore, SNIPEF advocates for the proposal and its emphasis on supporting the vulnerable; however, it is paramount that the economic implications of moving to cleaner heating solutions do not unduly impact middle-income families, many of whom are already facing financial pressures due to the rising cost of living. These families, often constrained by limited budgets, are also affected by escalating energy costs. A nuanced approach is essential, calling for a diversification of funding and support mechanisms to distribute the financial load more fairly across broader societal strata.

Considering the proposed ban on polluting heating systems by 2045, understanding the potential impact on Scottish households is critical. An exhaustive evaluation of the number of residences currently dependent on fossil fuel heating is vital to grasp the transition's breadth. This information will guide the strategic planning and resource allocation necessary to facilitate a seamless switch to greener heating solutions within the stipulated timeline.

The capacity of the skilled workforce within the heating and plumbing profession to meet the surge in demand for clean heating installations is equally crucial. Assessing the readiness of the current workforce to tackle this upsurge, including the availability of skilled professionals, the necessity for further training programmes, and the opportunities for job creation in the sector, is essential. Achieving the lofty aim of converting all buildings to non-polluting heating systems by 2045 hinges on a strategic commitment to workforce development and skills training.

**Q2**

**what extent do you agree that we should introduce a minimum energy efficiency standard to be met by private sector landlords by the end of 2028 (even if they are already using clean heating)?**

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	<ul style="list-style-type: none"> <li>• <b>Strongly support</b></li> <li>• Somewhat support</li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>The Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF) fully supports the introduction of a minimum energy efficiency standard for private sector landlords by the end of 2028.</p> <p>We acknowledge the critical role that the structural efficiency of a building plays in complementing the adoption of clean heating systems to create sustainable living spaces. By mandating these upgrades, not only will landlords be encouraged to enhance their properties for better energy performance, but it will also lead to considerable long-term reductions in energy usage for tenants.</p> <p>This initiative is vital for preventing prohibitively high costs for householders associated with inefficient buildings and aligns with our broader goal of reducing energy consumption. Ensuring that properties meet these minimum efficiency standards before transitioning to clean heating solutions is a key step towards decreasing overall energy demand and, in turn, lowering energy bills for tenants, including those in homes with existing clean heating systems.</p>	
<p><b>Q3</b></p>	<p><b>To what extent do you agree that we should introduce a minimum energy efficiency standard to be met in owner occupied homes (which still have a polluting heating system) by the end of 2033?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF agrees to introducing a minimum energy efficiency standard for owner-occupied homes with polluting heating systems by the end of 2033. This measure encourages homeowners to improve their properties' energy performance, which can lead to reduced energy consumption and</p>	<p><b>26</b></p>

	emissions, contributing to environmental goals and potentially lowering energy bills.	
<b>Q4</b>	<p><b>Do you agree with our proposal to set a minimum energy efficiency standard that can be met by either installing a straightforward list of measures, or showing a good level of energy efficiency based on a reformed EPC fabric efficiency metric?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>While the proposal to set a minimum energy efficiency standard offers flexibility and inclusivity, it could impose financial strains on some property owners, particularly in the current economic climate.</p> <p>The diversity of property types might also mean that not all homes can feasibly meet the standards through prescribed measures or EPC metrics, potentially leading to uneven application and effectiveness.</p> <p>Moreover, the reliance on a reformed EPC metric could complicate the assessment process, making it challenging for owners to comply and for authorities to enforce the standards effectively.</p> <p>However, this proposal is a good start.</p>	<b>27</b>
<b>Q5</b>	<p><b>What is your view on the initial proposed list of measures to meet the minimum energy efficiency standard?</b></p> <ul style="list-style-type: none"> <li>• <b>Strongly support</b></li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>The proposal includes a sensible list of measures that should be achievable, either in full or in part, by property owners. This approach allows for flexibility and practicality in meeting energy efficiency standards.</p>	<b>27</b>

<p><b>Q6</b></p>	<p><b>Do you think that properties for which most or all of the measures on the initial proposed list are not relevant should be required to meet an equivalent minimum energy efficiency standard?</b></p> <p>No: these properties should be considered compliant once they have installed all the measures that are appropriate for their building type, even if this is few or no measures.</p> <p>Yes: they should be required to meet the standard and additional measures should be included on the list (such as solid wall insulation, solid floor insulation and flat roof insulation), and they should be required to install all of these where feasible.</p> <p>Yes: they should be required to meet the standard and additional measures should be included on the list (such as solid wall insulation, solid floor insulation and flat roof insulation), but they should only be required to install some of these where feasible and cost effective.</p> <p><b>Yes: they should be required to meet the standard and additional measures should be included on the list (such as solid wall insulation, solid floor insulation and flat roof insulation), but they should only be required to install some of these where feasible, and they should be allowed additional time to do so.</b></p> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF agrees that properties for which the majority of the initial proposed measures are not applicable should still adhere to an equivalent minimum energy efficiency standard.</p> <p>It is crucial to expand the list to include additional measures like solid wall insulation, solid floor insulation, and flat roof insulation. However, it's essential that these measures are mandated only when feasible, and property owners should be granted extra time for implementation.</p> <p>This approach strikes a balance between the imperative of enhancing energy efficiency and the practical realities faced by property owners. By allowing for a degree of flexibility and additional time, we ensure that the measures are both economically viable and technically achievable across various property types. This thoughtful consideration encourages broader compliance and facilitates meaningful energy savings, enabling householders to devise and execute a compliance plan that is both effective and affordable over time.</p>	<p><b>27</b></p>
<p><b>Q7</b></p>	<p><b>Do you think that an alternative approach to setting the minimum energy efficiency standard is required?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> </ul>	<p><b>28</b></p>

	<ul style="list-style-type: none"> <li>• <b>Don't know</b></li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>Any approach taken must offer flexibility, adaptability, and inclusivity, ensuring that the standard remains relevant and achievable across different building types and circumstances.</p>	
Q8	<p><b>Do you agree that the use of bioenergy should continue to be permitted in certain circumstances?</b></p> <ul style="list-style-type: none"> <li>• No, it should be prohibited in all cases.</li> <li>• Yes, it should be permitted for those buildings already using it.</li> <li>• Yes, it should be permitted for those buildings who have no other clean heating system available.</li> <li>• <b>Yes, it should be permitted for those buildings already using it and for those buildings who have no other clean heating system available.</b></li> <li>• Yes, it should be used in wider circumstances (please describe these).</li> </ul> <p><u>Additional commentary from SNIPEF</u></p>	29
<b>Chapter Three: Property purchases</b>		<b>30-42</b>
6	<p>We must encourage homeowners, landlords, and businesses to adopt clean heating systems before 2045 to meet climate targets and avoid a sudden surge in demand. To achieve this, the government has explored scenarios where requiring building owners to switch to non-polluting heating before 2045 is appropriate.</p> <ul style="list-style-type: none"> <li>• 100,000 house sales in Scotland in 2022-23</li> <li>• 5,000 commercial sales or leases in 2022-23</li> </ul> <p><b>The Scottish Government is therefore proposing to introduce a new law which will require those purchasing a property to comply with the prohibition on polluting heating within a specified amount of time following completion of the sale.</b></p> <p>The requirement will only happen if the law is passed. Also, the purchaser of a property will be given time – known as a ‘grace period’ – to have the work carried out (including time to have their building assessed and/or to receive quotes from installers, as necessary). This would also not occur before 2033 at the earliest.</p> <p>The law places no new obligations on sellers.</p>	30-33

	<p>They propose that certain households and businesses will be eligible for additional time (first time buyers, for example), asked to meet a modified version of the Standard, or exempted from the need to move away from polluting heating following a property purchase – helping to ensure a just transition in line with our legal obligations.</p>	
7	<p><b>Financing</b></p> <ol style="list-style-type: none"> <li>1. Homeowners, whether upgrading insulation or switching to climate-friendly heating systems, will face extra costs. This will also impact the housing market, with homes featuring clean heating systems likely to command higher prices. New homebuyers should consider financing these changes, possibly through mortgages with lower interest rates for energy efficiency improvements, known as "<b>green mortgages</b>," allowing for cost spreading over time.</li> <li>2. Not everyone has a mortgage or wants to borrow from a bank to fund the additional costs. As such, some companies are developing product finance offers to help individuals spread the upfront cost of clean heating systems.</li> <li>3. The Scottish Government also currently provides zero interest loans through our Home Energy Scotland and Business Energy Scotland schemes to help people and small / medium enterprises finance energy efficiency work and install clean heating systems.</li> <li>4. Some individuals may lack the financial means. In such cases, extra time, additional support, or exemptions might be necessary.</li> </ol>	34-38
8	<p><b>Cost Cap</b></p> <p>The government may create a ceiling or cap on the potential cost of meeting the Heat in Buildings Standard.</p> <p>A cost-cap may be necessary to prevent homeowners from facing unreasonable expenses when improving their home's energy efficiency. It also provides clarity for banks and building societies in assessing the affordability of mortgage and loan repayments.</p> <p>Options include:</p> <ul style="list-style-type: none"> <li>• A flat cap that applies to all homes</li> <li>• A size-based cap based on internal area</li> <li>• Purchase price-based cap that applies to buildings based on the price paid for the property.</li> </ul>	38-39
9	<p><b>Meeting the Heat in Buildings Standard at other points in time</b></p> <p>In certain cases, it might be logical to require people to transition away from polluting heating, such as when their current gas or oil boiler reaches the</p>	40

	<p>end of its lifespan. However, as the clean heating market evolves, costs decrease, and supply chains mature, it may become feasible to mandate the transition away from polluting heating at times other than property purchases.</p> <p><b>The government proposes that the Heat in Buildings Bill will provide Scottish Ministers with the ability to require homes and non-domestic buildings to end their use of polluting heating in other circumstances (beyond the purchase of a property).</b></p>	
<p><b>Q9</b></p>	<p><b>To what extent do you support the requirement to end the use of polluting heating following a property purchase?</b></p> <ul style="list-style-type: none"> <li>• <b>Strongly support</b></li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF supports the requirement to end the use of polluting heating following a property purchase. However, the support would depend on its execution details, such as the feasibility for property owners, the financial support available, and the impact on emissions reduction.</p> <p>It is also essential to acknowledge that middle-income families, who often make up the majority of homebuyers, should not bear the entire financial burden of these transitions. Equitable solutions are imperative. Financial institutions, such as banks, could play a pivotal role in this regard. Encouraging banks to offer near-zero interest improvement loans as part of green mortgage packages or providing options for delayed payments would alleviate the financial strain on homeowners.</p> <p>This approach not only promotes fairness but also ensures a more inclusive and sustainable transition to cleaner heating solutions. It strikes a balance between environmental responsibility and the financial well-being of property owners, ultimately contributing to a greener and more equitable future.</p>	<p><b>41</b></p>
<p><b>Q10</b></p>	<p><b>We are proposing to give those purchasing a property a 'grace period' to end their use of polluting heating. Do you agree with this proposal?</b></p> <ul style="list-style-type: none"> <li>• Yes – the grace period should be two years.</li> <li>• <b>Yes – the grace period should be three years.</b></li> <li>• Yes – the grace period should be four years.</li> <li>• Yes – the grace period should be five years.</li> </ul>	<p><b>41</b></p>

	<ul style="list-style-type: none"> <li>No, please provide reasons for your view.</li> </ul>	
<b>Q11</b>	<p><b>To what extent do you support our proposal to apply a cost cap where people are required to end their use of polluting heating following a property purchase?</b></p> <ul style="list-style-type: none"> <li>Strongly support</li> <li>Somewhat support</li> <li>Neither support or oppose</li> <li>Somewhat oppose</li> <li><b>Strongly oppose</b></li> <li>Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>The Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF) firmly opposes the proposal to impose a cost cap on the installation of cleaner heating systems. We believe that such a cap could inadvertently disadvantage installers financially, affecting the overall health of the market.</p> <p>It is crucial to protect against unfair practices within the industry. However, maintaining a profitable market is equally important, as it encourages skilled professionals to enter the sector, thereby increasing the availability of qualified installers. This expansion is vital for the widespread adoption and successful implementation of cleaner heating solutions.</p> <p>We argue that a more nuanced approach is needed, one that does not rely on a simplistic cost cap. The complexity of installations varies greatly, with factors such as the size of the property and the extent of the work required contributing to this variability. Imposing a uniform cap could lead to unfair outcomes, disadvantaging properties that may inherently require more extensive work.</p> <p>SNIPEF urges the government to engage in a detailed and collaborative dialogue with industry stakeholders. This conversation should aim to identify solutions that ensure the financial sustainability of installers and the sector at large, while still advancing environmental objectives. Achieving a balance between ensuring market profitability and meeting environmental targets is crucial for the long-term success of cleaner heating initiatives and their acceptance by both installers and property owners.</p>	<b>41</b>
<b>Q12</b>	<p><b>Which of the following methods of applying a cost-cap do you support?</b></p> <ul style="list-style-type: none"> <li>A flat cost-cap.</li> <li>A size-based cost-cap.</li> <li>A purchase price-based cost-cap.</li> </ul>	<b>42</b>

	<ul style="list-style-type: none"> <li>• <b>None.</b></li> <li>• Another, please suggest below.</li> </ul>	
Q13	<p><b>To what extent do you support the proposal that the Scottish Ministers should be given powers to extend the circumstances in future (beyond a property purchase) in which people could be required to end their use of polluting heating?</b></p> <p>This could be, for example, preventing the installation of new fossil fuel boilers when replacing the heating in your home or business premises?</p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u><a href="#">Additional commentary from SNIPEF</a></u></p>	42
<b>Chapter Four: Connecting Heat Networks</b>		<b>43-49</b>
10	<p>Heat networks generate heat and use a network of pipes to supply it to nearby homes, businesses, and public buildings. The heat can be generated in different ways, depending on the resources and assets available in the area. This could be through heat pumps that draw thermal energy from a local river, or from the recovery of excess heat from local businesses like distilleries, or in many other creative ways we have seen across Europe.</p> <p><b>All heat networks will be required to generate most of their heat from renewables or bioenergy by 2045.</b></p> <ul style="list-style-type: none"> <li>• About 30,000 homes are connected to heat networks</li> <li>• About 1,000 heat networks</li> </ul> <p>Local authorities or private financiers need to be confident that homes and especially non-domestic buildings will connect to a proposed heat network project.</p> <p><b>The government proposing to provide local authorities and the Scottish Ministers with powers to require buildings within a Heat Network Zone to end their use of polluting heating systems (by a certain date, and with a minimum notice period).</b></p> <p>The benefits are:</p>	43-45

	<p><b>Efficient network design:</b> They provide clarity to heat network developers, allowing them to confidently design and construct the core network infrastructure. This reduces costs and disruptions during installation.</p> <p><b>Increased participation and lower costs:</b> Building owners are more likely to join the heat network, assuring investors of revenue potential. This encourages investment, potentially leading to lower heating costs for end users.</p> <p>The government are proposing that any buildings within a Heat Network Zone will not need to meet the Heat in Buildings Standard following a property purchase.</p>	
11	<p><b>The government will investigate whether the Heat in Buildings Bill could also provide powers to local authorities or the Scottish Ministers that require developers to connect new buildings within Heat Network Zones to a heat network.</b></p>	45
12	<p><b>Waste Heat</b></p> <p>Heat networks can use various sources, such as excess or waste heat from local businesses or assets, including distilleries, data centres, sewers, and incinerators.</p> <p>The government aims to include recoverable heat when designating Heat Network Zones and may impose conditions on operators regarding waste heat use.</p> <p><b>The government are considering using the Heat in Buildings Bill to require occupiers of non-domestic properties to provide information about unused heat on their premises (on request and in confidence); and potentially require buildings with unused heat to provide this to a local heat network (where that would be cost-effective).</b></p>	46-47
Q14	<p><b>To what extent do you support our proposal to provide local authorities (and Scottish Ministers) with powers to require buildings within a Heat Network Zone to end their use of polluting heating systems by a given date?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u><a href="#">Additional commentary from SNIPEF</a></u></p>	48

	<p>SNIPEF supports the proposal as this approach aligns with the goal of transitioning to cleaner heating systems and can contribute to environmental sustainability.</p> <p>However, it is essential that the implementation of such powers is carried out thoughtfully, considering the practicality for building owners, financial support, and a fair transition process to ensure the successful adoption of cleaner heating solutions.</p>	
<p><b>Q15</b></p>	<p><b>To what extent do you support our proposal to provide powers to local authorities (or Scottish Ministers) that require developers to connect new buildings within Heat Network Zones to a heat network?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF supports the proposal as this measure encourages the expansion of heat networks and promotes the use of cleaner heating systems from the outset in new developments.</p> <p>It aligns with the goal of reducing polluting heating and advancing environmental sustainability.</p> <p>However, it's important that these requirements are implemented with consideration for the practicality and feasibility of heat network connections for developers, ensuring a smooth transition to cleaner energy solutions.</p>	<p><b>48</b></p>
<p><b>Q16</b></p>	<p><b>To what extent do you support our proposal to require occupiers of non-domestic properties to provide information about unused heat on their premises?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF supports the proposal to provide information about unused heat on their premises, with the condition that privacy of data must be securely maintained.</p>	<p><b>48</b></p>

<b>Q17</b>	<p><b>To what extent do you support our proposal to potentially require buildings with unused heat to provide this to a local heat network?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF supports this proposal as it aligns with the goal of utilising excess heat resources and promoting environmental sustainability.</p> <p>However, it's crucial to assess the practicality and feasibility of such requirements for building owners and ensure that the transition process is fair and economically viable.</p>	<b>49</b>
<b>Chapter Five: Monitoring and Enforcement</b>		<b>50-59</b>
<b>13</b>	<p><b>Monitoring</b></p> <p>Two ways to monitor whether people are meeting their requirements:</p> <ol style="list-style-type: none"> <li>1. <b>EPCs:</b> Using EPCs to monitor the Standard offers familiarity and accessibility, as they are already part of property sales and available via the EPC Register. However, homeowners, landlords, or businesses would be responsible for arranging and paying for the EPC assessment, creating additional costs. EPC costs vary but can exceed £100 in the domestic sector, potentially higher in rural areas and on islands. Nonetheless, this approach may create employment opportunities for assessors.</li> <li>2. <b>Sampling:</b> Sampling properties offers cost savings for monitoring and is a more proportionate system, considering the vast number of properties in Scotland. While there are likely costs to public finances, the current plan does not involve physical inspections, which can minimise government expenses.</li> </ol>	<b>50-52</b>
<b>14</b>	<p><b>Enforcement</b></p> <p>While public support for emissions reduction is strong, it may not be sufficient to drive compliance with the Standard.</p> <p>The government proposes civil penalties for non-compliant private landlords to protect tenants. However, fines may not be suitable for all initially. Cost is a major barrier, and imposing fines during the Standard's early stages may worsen financial burdens.</p>	<b>52-53</b>

	<p>They have explored additional charges but aim to avoid increasing costs for households and businesses, and are considering whether banks and building societies can make compliance with property-related laws, including the Heat in Buildings Standard, a mortgage and insurance condition, providing a strong incentive.</p> <p>If compliance remains low, they may consider civil penalties in the future, ensuring they are proportionate and affordable through consultation before implementation. Initially, penalties will not play a key role.</p>	
15	<p><b>Monitoring and enforcement body</b></p> <p>Once the government confirm how the monitoring and enforcement systems will work in practice, they will then consider which bodies are best placed to deliver these.</p>	54
16	<p><b>Exemptions and extra time</b></p> <p>While monitoring and enforcement are necessary to make the Heat in Buildings Standard credible, homeowners, landlords and businesses should be assured that they will be treated fairly.</p> <p><b>To ensure fairness, the Heat in Buildings Bill will ahead of 2045, exempt those who can't, or perhaps should not have to, meet the Heat in Buildings Standard.</b></p> <p><b>It will also provide extra time for those who need it to meet the Standard, or require that people comply with a modified version of the Standard which takes into account their building's characteristics or unique circumstances, and make it easy for people to appeal where they feel the requirements are incorrect or unfair.</b></p> <p>Exemptions are proposed to the Heat in Buildings Standard, particularly for first-time buyers and certain businesses to protect the local or national economy. Exemptions could apply in specific circumstances, such as impending building demolitions or major renovations.</p> <p>Additional time for compliance may be necessary for properties with limited clean heating options, such as flats, buildings with energy efficiency challenges, or areas with electricity grid constraints.</p> <p>The government is considering the development of an assessment tool to determine the suitability of different heating systems and energy efficiency measures for buildings. This tool would provide detailed technical assessments and support potential modifications to the Standard based on building characteristics or unique circumstances, as well as appeals against requirements deemed incorrect or unfair.</p>	54-56

<p><b>Q18</b></p>	<p><b>We will need to have a way to monitor if people are meeting the Heat in Buildings Standard, and discussed two options for this.</b></p> <p><b>Which do you support?</b></p> <ul style="list-style-type: none"> <li>• Submitting EPCs alone.</li> <li>• Sampling a percentage of buildings.</li> <li>• <b>A combination of the two.</b></li> <li>• None, there should be no monitoring.</li> <li>• Another method, please suggest below or explain your selected answer.</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>The combination of EPC and sampling balances thoroughness with practicality, ensuring a broad and representative assessment of compliance while minimising the burden on building owners and the administrative system.</p> <p>Sampling allows for targeted inspections to verify EPC accuracy and building performance, addressing potential discrepancies or fraudulent practices.</p>	<p><b>57</b></p>
<p><b>Q19</b></p>	<p><b>We will need to have a way to enforce the Heat in Buildings Standard. We discussed possible options to help achieve compliance. What are your views on these ideas?</b></p> <ul style="list-style-type: none"> <li>• <b>I support relying on market and financial product mechanisms such as mortgages or home/ building insurance.</b></li> <li>• <b>I support extra Council Tax and Non-domestic Rates charges in future for those who don't comply.</b></li> <li>• I support the introduction of civil penalties in future if compliance is not achieved.</li> <li>• I support a mixture of the above options.</li> <li>• I do not support the suggested enforcement tools but have another suggestion (please provide below).</li> <li>• I do not support any form of enforcement.</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF supports bullets one and two</p>	<p><b>57</b></p>
<p><b>Q20</b></p>	<p><b>To what extent do you support our proposals to modify the Standard or exempt certain people from the need to meet the Heat in Buildings Standard?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> </ul>	<p><b>58</b></p>

	<ul style="list-style-type: none"> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>Introducing exemptions is a reflection of the broader challenges in achieving sustainable and energy-efficient living. Modifications might be necessary to account for technological advancements, socio-economic factors, or unique architectural characteristics that make strict adherence to the initial standards either impractical or economically unfeasible for some.</p> <p>On the other hand, too lenient an approach risks diluting the ambitious goals set to mitigate climate change impacts, potentially leading to significant variances in energy performance and carbon emissions reductions across the sector.</p>	
<p><b>Q21</b></p>	<p><b>Which people, businesses, or types of buildings, if any, should be eligible for a modified standard or exemptions?</b></p> <p><u>Additional commentary from SNIPEF</u></p> <ul style="list-style-type: none"> <li>• Historic or listed buildings where restrictions exist on modifications.</li> <li>• Remote properties with limited access to technologies or infrastructure</li> </ul>	<p><b>58</b></p>
<p><b>Q22</b></p>	<p><b>To what extent do you support our proposals to give certain people extra time to meet the Heat in Buildings Standard?</b></p> <ul style="list-style-type: none"> <li>• Strongly support</li> <li>• <b>Somewhat support</b></li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>Giving certain people extra time to meet the Heat in Buildings Standard is a proposal that warrants support to a considerable extent, particularly when it is focused on ensuring that the transition to more energy-efficient buildings is fair, practical, and considers the diverse circumstances of building owners and occupants.</p> <p>However, while supporting the proposal to a significant extent, it is also crucial to ensure that such extensions are not overly generous to the point</p>	<p><b>58</b></p>

	<p>where they undermine the urgency of climate action and energy efficiency goals.</p> <p>Clear deadlines should be established to ensure that the extensions serve as a bridge to compliance, not an indefinite postponement. Regular monitoring and support should accompany these extensions to ensure progress towards meeting the standards within the extended timeframes.</p>	
<b>Q23</b>	<p><b>Which people, businesses or types of buildings, if any, should be eligible for extra time?</b></p> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF acknowledges the necessity of setting a minimum energy efficiency standard for properties. However, we emphasise the importance of considering the unique challenges faced by low-income households in meeting these standards. We advocate for the availability of grants and other financial support mechanisms to assist these households in making the required upgrades without undue financial strain.</p> <p>Given the complexity and potential high costs associated with certain properties—particularly those requiring specific or extensive modifications—we propose that additional time be allowed for compliance in such cases. This extended timeline should not be open-ended but must be accompanied by a detailed plan for implementation, outlining clear steps and a realistic timeframe for achieving compliance.</p> <p>This approach ensures that while progress towards energy efficiency is maintained, it is done so with an understanding of and sensitivity to the varied capabilities and resources of different households. It encourages a more inclusive and equitable path to compliance, providing support where needed and allowing for flexibility in how standards are met, particularly for those most at risk of financial hardship.</p>	<b>58</b>
<b>Chapter Six: Public Sector Buildings</b>		<b>59-61</b>
<b>17</b>	<p>There are around 23,000 buildings in public ownership – these include buildings like the Scottish Government’s own estate, as well as local authority offices and many of the amenities that we use.</p> <p>If the government are asking homeowners, landlords and businesses to invest in this transition, then there is a real case for the public sector to show leadership by taking early and sustained action to decarbonise its estate. This will also help to further develop the supply chain for manufacturers and installers of new heating systems and energy efficiency products.</p> <p><b>The government are proposing that the Heat in Buildings Bill should require all buildings owned by a Scottish public authority to be using clean heating systems by the end of 2038.</b></p>	<b>59-60</b>

	<p>Potential duties on public authorities:</p> <ul style="list-style-type: none"> <li>• Placing a new duty on public sector organisations which would prevent them from replacing a polluting heating system with another (unless impractical).</li> <li>• Creating a new duty for each public body to develop and implement a plan to decarbonise their buildings.</li> <li>• Placing a new statutory reporting duty on public sector organisations to demonstrate progress towards their 2038 objective (with the potential for the 2038 then to be non-statutory)</li> <li>• Placing no further statutory requirements on public sector organisations (instead relying on their ability to plan alongside our delivery and funding programmes to meet the 2038 objective).</li> </ul> <p>These options are not mutually exclusive.</p>	
<p><b>Q24</b></p>	<p><b>To what extent do you support our proposal to require all buildings owned by a Scottish public authority to be using clean heating systems by 2038?</b></p> <ul style="list-style-type: none"> <li>• <b>Strongly support</b></li> <li>• Somewhat support</li> <li>• Neither support or oppose</li> <li>• Somewhat oppose</li> <li>• Strongly oppose</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF strongly supports the proposal for all buildings owned by Scottish public authorities to transition to clean heating systems by 2038, recognising the influential role the public sector can play in leading sustainability efforts. The transition not only sets a benchmark for private entities but also fosters the growth of the low-carbon heating market through increased demand, potentially driving down costs through economies of scale and spurring innovation.</p> <p>However, we must also address the significant financial implications of this transition, particularly for councils managing older buildings that may require substantial retrofitting to accommodate clean heating systems effectively. Given the financial constraints many councils already face, the prospect of undertaking such costly upgrades without impacting service provision is a considerable challenge.</p> <p>Therefore, while we advocate for the adoption of clean heating in public sector buildings, we urge the government to consider the provision of</p>	<p><b>61</b></p>

	<p>adequate financial support and resources to facilitate this transition. It is essential to ensure that councils are not left to bear the financial burden alone, which could lead to a reduction in public services. A collaborative approach, involving targeted funding and support mechanisms, is crucial to achieving these environmental goals without compromising the quality of public services.</p> <p>This balanced perspective acknowledges the importance of leading by example in environmental stewardship while recognising the practical challenges and financial realities faced by public authorities in Scotland.</p>	
Q25	<p><b>We are considering the following further duties on public sector organisations to support planning for the transition by 2038:</b></p> <p>Please tell us which option(s) you would support.</p> <ul style="list-style-type: none"> <li><b>A. Placing a new duty on public sector organisations which would, from 2025, prevent them from replacing a polluting heating system with another (unless impractical)</b></li> <li><b>B. Creating a new duty for each public body to develop and implement a plan to decarbonise their buildings</b></li> <li><b>C. Placing a new statutory reporting duty on public sector organisations to demonstrate progress towards their 2038 objective (with the potential for the 2038 then to be non-statutory)</b></li> <li>D. Placing no further statutory requirements on public sector organisations (instead relying on their ability to plan alongside our delivery and funding programmes to meet the 2038 objective).</li> </ul> <p><u>Additional commentary from SNIPEF</u> SNIPEF supports A, B and C</p>	61
<b>Chapter Seven: Amendments to Existing Legislation</b>		<b>62-63</b>
18	<p><b>Renewable Heat target</b></p> <p>The Heat in Buildings Strategy set out a provisional target for renewable heat of at least 22% by 2030. This target is based on a requirement in previous legislation, and relates to the percentage of heat to be produced from renewable sources.</p> <p>This target doesn't capture the ways in which Scotland is performing on heat decarbonisation and emissions. The government believe that the Heat in Buildings Bill gives them an opportunity to change this.</p> <p><b>They may want to include powers within the proposed Heat in Buildings Bill requiring a new or amended target.</b></p>	62

19	<p><b>Heat Networks Act 2021 (Scotland)</b></p> <p>In 2021, Scotland was the first country within the UK to pass legislation to support the growth of heat networks. The UK Parliament has since passed the Energy Act 2023 which will bring welcome new consumer protections for heat network consumers across Great Britain.</p> <p><b>As a result, the government may wish or need to amend our 2021 Act to ensure alignment with the Energy Act and that the sector is regulated proportionately in Scotland.</b></p>	62
Q26	<p><b>Do you agree with our proposals to include powers in the proposed Heat in Buildings Bill to change the current requirement in legislation for a narrowly-defined renewable heat target?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>By broadening the scope allows for more flexibility in achieving renewable heat goals, accommodating advancements in technology and changes in market dynamics or policy landscapes. It may also encourage innovation by not limiting the scope to current technologies or methodologies,</p> <p>A broader target can also integrate more with other energy and environmental goals, contributing to a more comprehensive and coherent approach to decarbonisation, and aligns with best practices in policy-making, where flexibility and adaptability are key to accommodating future developments and ensuring long-term sustainability.</p>	63
Q27	<p><b>Do you agree that the Heat Networks (Scotland) Act 2021 should be amended in light of the passage of the Energy Act 2023?</b></p> <ul style="list-style-type: none"> <li>• Yes</li> <li>• No</li> <li>• Don't know</li> </ul> <p><u>Additional commentary from SNIPEF</u></p> <p>SNIPEF believes such a move would ensure legislative coherence and addresses the evolving needs of the energy sector.</p>	63
Q28	<p><b>Are there any further amendments to the Heat Networks (Scotland) Act 2021 that the Scottish Government should consider?</b></p> <p><u>Additional commentary from SNIPEF</u></p>	63

	NB: Could we do anything around security of supply within the profession, supply chain or skills development?	
	<b>Chapter Eight: The Heat in Buildings bill</b>	<b>64-67</b>
11	<p>The government intends to pass the Heat in Buildings Bill by the end of this term of the Scottish Parliament (in May 2026) but have not provided any specific dates about when the new laws would apply. This is because it is for the Scottish Parliament to decide when it will consider the Bill, at each Stage.</p> <p><b>Bill process:</b></p> <ol style="list-style-type: none"> <li>1. Consultation</li> <li>2. Introduce the Bill</li> <li>3. Stage One: Scottish parliament Committee to investigate and report</li> <li>4. Stage Two: Propose any changes, if needed, to government</li> <li>5. Stage Three: Final vote</li> <li>6. Royal Assent</li> <li>7. Regulation or secondary legislation (which may need to start the process again)</li> </ol>	<b>64-67</b>
	<b>Chapter Nine: Glossary of terms and acronyms</b>	<b>68-69</b>
	<b>Chapter Ten: Responding to the consultation</b>	<b>70-71</b>

**Richard Campbell**  
 19 February 2024