



# CONSULTATION ON SUPPORT FOR LOW CARBON HEATING IN RESIDENTIAL BUILDINGS



OCTOBER 2024

EMAIL RESPONSE FORM

## Consultation on support for low carbon heat in the residential sector

Enquiries to:

### Heat Policy

Department for the Economy  
6th Floor, Adelaide House  
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Belfast, BT2 8FD

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Web: [Department for the Economy Website](#)

### How to Respond

This consultation will be hosted online at the following website: [NI Direct - Citizen Space](#). The Citizen Space website has been specially designed to be as user-friendly and welcoming as possible for those who wish to complete the consultation. It also allows DfE to rapidly collate results. For this reason, we would encourage anyone who is interested in responding to this consultation to utilise Citizen Space as the method of their response.

Your response will be most useful if it is framed in direct response to the questions asked, though further comments and evidence are also welcome.

If this is not possible, you can however respond to this consultation via email to [lowcarbonheatconsultation@economy-ni.gov.uk](mailto:lowcarbonheatconsultation@economy-ni.gov.uk) by completing this form on the departments website or you can respond in writing to the following address:

### Low Carbon Heat Consultation

DfE Heat Policy Team  
6th Floor, Adelaide House  
Adelaide Street  
Belfast  
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When responding via email or in writing, please state whether you are responding as an individual, or representing the views of an organisation (please state the name of the organisation). Please also quote the following reference in your response: "Low Carbon Heat Consultation". In addition, when replying via email, it is possible to add supporting information to your response, either by way of an attachment or by posting text in the body of the email. Please ensure that you reference the question the additional information is in response to when doing so.

Responses must be received by **23:59 on 31 December 2024**.

Please contact us if you require this document in an alternative format for accessibility purposes.

## General Information

**Name:**

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**What best describes your interest in this consultation**

- ☐ Member of the public/consumer
- ☐ Academia
- ☐ Heating manufacturer/supplier
- ☐ Heating Installer
- ☐ Government representative
- ☐ Arms Length Body
- ☐ Consumer representative organisation
- ☒ Other (please specify)

Trade Association

**Please indicate if you are replying as:**

- ☐ An Individual / Member of the Public
- ☒ On behalf of a body or organisation  
(please state who you represent below)

Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF)

## Theme 1: Eligible Technologies

### Question 1

Do you agree with the criteria used to inform technology eligible for support?



Yes

If you do not agree, please explain why you do not agree and provide evidence to support your answer.

### Question 2

Do you think that other criteria should be applied?



Yes

Please provide evidence to support your answer.

The Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF) strongly advocates for the inclusion of quality assurance and installer competency as fundamental criteria for low-carbon heating technology eligibility in Northern Ireland's support schemes.

Membership in a recognised trade or professional body adds immense value by ensuring a high standard of professionalism, qualifications and skills within the industry. These standards not only guarantee competent installations but also instil consumer confidence and ensure public funds are spent effectively.

As an example, SNIPEF members are held to the highest standards of professionalism, undergoing rigorous vetting processes, achieving accredited qualifications and completing ongoing training to remain at the forefront of advancements in low-carbon technologies.

Our robust complaints procedure further safeguards accountability, protects consumers and reinforces trust in the profession. These frameworks ensure a level of quality and reliability that benefits both the customer and the broader decarbonisation agenda.

Accredited qualifications and membership in professional organisations like SNIPEF provide a benchmark of excellence, separating qualified professionals from unverified operators. This distinction is critical to delivering effective and long-lasting installations that meet the exacting requirements of low-carbon heating systems.

We encourage the Northern Ireland Executive to engage with SNIPEF and other trade bodies to incorporate these standards into their support schemes, leveraging our expertise and ensuring the transition to low-carbon heating is both effective and equitable.

SNIPEF welcomes further discussions with the Northern Ireland Executive to provide insights from our leadership of the plumbing and heating profession and to support the development of policies that prioritise quality, accountability and professionalism.

By working collaboratively with recognised trade bodies, the Executive can ensure that its decarbonisation goals are achieved through sustainable and consumer-focused solutions.

### Question 3

The department does not intend to provide financial support for biomass boilers, do you think there should be exceptions to this?



Yes

SNIEF believes exemptions for biomass boilers should be considered in specific cases, such as rural or off-grid locations where other low-carbon technologies are impractical or uneconomical.

Support should also extend to existing biomass systems to prevent unnecessary waste and recognise past efforts to decarbonise. These exemptions should be subject to stringent efficiency and emissions standards, ensuring alignment with decarbonisation goals while addressing diverse consumer and building needs.

### Question 4

The department does not intend to provide financial support for hybrid heat pumps, do you think there should be exceptions to this?



Yes

Please give reasons for your answer

SNIEF believes there should be exceptions to the exclusion of financial support for hybrid heat pumps, but only in the deployment where they are deemed the most effective solution.

Hybrid systems can be a practical solution for properties such as older, poorly insulated, or rural homes that require higher heating temperatures. These systems allow for a gradual transition to low-carbon heating by combining renewable and traditional systems, reducing upfront costs for consumers and addressing installation challenges in harder-to-adapt properties.

Hybrid heat pumps also provide flexibility, enabling households to benefit from low-carbon heating while maintaining reliability during peak demand. Denying support risks excluding a segment of the population from decarbonisation efforts.

### Question 5

Should a minimum Seasonal Co-efficient of Performance of at least 2.8 or higher be applied to the low carbon technologies considered for support? Please tick all that apply.



Air Source Heat Pump



Ground Source Heat Pump



Water Source Heat Pump

Please give reasons for your answer

A higher performance ensures lower energy usage and therefore running costs for the consumer. MCS also specifies a minimum performance of 2.8 SCOP at 35 degrees flow temperature.

## Theme 2: Building Efficiency and Eligibility

### Question 6

Should all domestic buildings be eligible for low carbon heating technology support?



No

Please give reasons for your answer.

SNIEF supports broad eligibility for low-carbon heating technology support but believes prioritisation is necessary to ensure maximum impact and fairness. Properties with the highest potential for carbon reduction, such as those relying on fossil fuels or with poor energy efficiency, should be prioritised.

Without addressing insulation and efficiency, some homes may not fully benefit from technologies like heat pumps, risking suboptimal performance and wasted investment. Additionally, support should exclude second homes and holiday properties, as these are typically owned by higher-income individuals and do not deliver the same societal benefits as primary residences.

Targeted funding ensures equitable and effective decarbonisation.

### Question 7

What minimum energy efficiency criteria in relation to domestic buildings should be met (if any) to make them suitable for a low carbon heating technology support?

Option A – No minimum energy efficiency requirements.

Option B – A valid EPC with no loft or wall insulation recommendations.

Option C – An energy assessment of the home conducted by a technical adviser.

Option D – A minimum standard of EPC rating

**Option E – Other method (please specify).**

Please give reasons for your answer.

SNIEF believes in a combined approach where a valid Energy Performance Certificate (EPC) is required as a baseline, supplemented by a tailored energy assessment conducted by a qualified technical adviser for properties below a specified EPC threshold. This ensures that low-carbon technologies are implemented where they are most effective while accommodating older or harder-to-insulate homes.

However, we stress the need for fixed costs for energy assessments to prevent exploitation and ensure affordability. Additionally, reviewing the EPC system is essential, as it is poorly managed and often yields inconsistent and questionable results, reducing its value as a reliable criterion.

There is a growing public distrust of EPCs, and this distrust must be addressed.

### Question 8

If you selected Option C – do you think support should be available towards the costs associated with an energy assessment as part of support for the installation of the low carbon technology?



Yes

Please give a reason for your answer.

SNIEF proposed a hybrid approach in question 7, incorporating option C, ensuring energy assessments are part of the eligibility process. We believe the cost of these assessments should be eligible for support but must be fixed to prevent exploitation by unethical contractors.

### Question 9

Do you agree that support for low carbon heating technologies is provided separately for owner-occupiers with alternative provision of support made for landlord, social housing, and non-domestic properties?



Yes

Please give reasons for your answer.

SNIPEF agrees that support for low-carbon heating technologies should be provided separately for owner-occupiers, with alternative provisions for landlords, social housing and non-domestic properties.

Each group faces unique challenges; owner-occupiers often require direct financial incentives, while landlords and social housing providers benefit from targeted schemes tailored to scale and compliance.

This approach ensures equity by addressing the needs of vulnerable groups, such as tenants in social housing, while streamlining administration for better efficiency. Tailored provisions will maximise the impact of funding, reduce barriers to adoption and ensure all sectors transition effectively to low-carbon heating technologies in a fair and sustainable manner.



### Question 10

Do you agree that self-build properties should be eligible for support at this time?

☒

No

Please give reasons for your answer.

In Scotland, the New Build Heat Standard requires all new buildings applying for a building warrant from April 2024 to install climate-friendly heating systems, effectively prohibiting the use of oil and gas boilers in new constructions. SNiPEF believes that the Northern Ireland Executive should implement similar measures by amending building regulations to mandate the installation of heat pumps or equivalent low-carbon heating technologies as a mandatory condition for all new builds, including self-build properties.

This approach ensures that all new homes contribute to decarbonisation goals from the outset without the need for additional public funding. Instead, financial support can be focused on retrofitting existing properties, where the challenges and costs of transitioning to low-carbon heating are significantly greater. Mandating low-carbon heating in new builds aligns the building sector with long-term decarbonisation targets and ensures consistent standards for sustainability in housing.

### Question 11

Do you think additional financial support should be available to those homes in rural and island locations?

☒

Both – rural and island

☐

Rural only

☐

Island only

☐

Neither

Please provide reasons for your answer.

SNiPEF believes additional financial support should be available to homes in rural and island locations. These areas often face higher costs for installing low-carbon heating technologies due to logistical challenges, limited infrastructure and reduced availability of qualified installers. Tailored support would help bridge these gaps, ensuring equitable access to decarbonisation measures regardless of geography.

Furthermore, rural and island homes frequently rely on fossil fuels like oil, making them ideal candidates for prioritised interventions to reduce emissions and harmful byproducts.

Providing targeted financial assistance will promote fairness, address unique challenges and accelerate the adoption of low-carbon heating in these harder-to-reach areas.

## Question 12

If you answered yes to Question 11, how would homes be identified as rural by the department?

Please provide reasons for your suggestion.

SNIPEF recommends using existing systems to classify rural and urban areas. Creating additional classifications would unnecessarily complicate the process and should be avoided.

## Question 13

Do you agree that to be eligible for support, a new heating installation should replace fossil fuel heating, replace direct electric heating, or be installed where no central heating currently exists?



Yes

Please give reasons for your answer.

SNIPEF agrees that eligibility for support should focus on replacing fossil fuel heating, direct electric heating or installations where no central heating currently exists.

The primary objective of support schemes should be to prioritise decarbonisation by targeting fossil fuel systems, which contribute significantly to carbon emissions. While older low-carbon systems may lack the latest efficiencies, they already play a role in reducing emissions and do not warrant public funding for replacement at this time. Redirecting resources toward retrofitting fossil fuel systems ensures the greatest impact on decarbonisation goals.

This approach maximises the value of limited funding, addressing the most urgent needs first while supporting the transition to net zero.

### Question 14

Do you agree that replacing a low carbon heating system with another low carbon heating system should be ineligible for support?

☒

Yes

☐

No

Please give reasons for your answer

Due to limited budgets, SNIPEF believes replacing one low-carbon heating system with another should not be eligible for support.

Prioritising support for transitioning from fossil fuel or inefficient heating systems ensures resources are directed where they will achieve the most significant carbon reduction and societal impact.

## Theme 3: Consumer Eligibility

### Question 15

Should households who have received energy efficiency support via schemes such as NISEP or Affordable Warmth be able to apply for additional low carbon heat support?

☒

Yes

Please give reasons for your answer.

SNIPEF believes households that have received support for energy efficiency measures should remain eligible for low-carbon heating support. Insulation and efficiency upgrades are essential precursors to effective low-carbon heating systems, making additional funding the logical next step to fully decarbonise.

Excluding these households could undermine efforts to maximise carbon savings and achieve net-zero goals, particularly in homes already partway through the transition process. Supporting such households ensures continuity and maximises the impact of prior investments.

### Question 16

Should support options be designed to prioritise or target certain groups of people (such as those on low incomes)?



Yes

Please give reasons for your answer. If you answered Yes, please detail which groups should be targeted and how could this be achieved?

SNIPEF agrees that support options should target specific groups, but this must not disadvantage other households, particularly middle-income families.

Fully financed schemes should prioritise low-income households unable to afford the costs of transitioning to low-carbon heating. However, focusing solely on this group risks unfairly restricting funding for middle-income households, many of whom are also struggling with the cost-of-living crisis. These families, while not eligible for full funding, still require meaningful financial support to avoid being excluded from the decarbonisation agenda.

Support schemes must strike a balance, providing fully funded options for the poorest while ensuring partial funding or tailored incentives are available for middle-income households. This inclusive approach maximises uptake, ensures fairness and avoids polarising access to funding.

### Question 17

Should prioritisation or additional support be given to those with older (perhaps 15+ years) fossil fuel boilers?



No

Please give reasons for your answer.

While replacing older fossil fuel boilers could offer significant emissions reductions and energy efficiency gains, the higher installation costs associated with their retrofitting, such as changes to piping or radiators, must be considered. Providing additional support for these systems risks reducing the overall funding available to transition a larger number of households to low-carbon heating.

Targeting older boilers could still align with decarbonisation goals, but any additional prioritisation must be weighed against the need for equitable and widespread adoption. A balanced approach is essential to ensure funding has the greatest overall impact.

### Question 18

Should additional support be offered to the consumer where no central heating system is present in the home?



No

Please give reasons for your answer.

The fund's purpose is to decarbonise heating systems, meaning its focus should remain on replacing carbon-intensive systems rather than creating new ones for households without existing central heating. If someone lacks central heating but is not emitting significant carbon, this does not directly contribute to decarbonisation goals. Households without heating due to financial hardship should be supported through poverty relief or social funding to provide basic heating infrastructure.

However, if the absence of central heating results in reliance on carbon-intensive sources, such as coal or peat (common in remote areas), funding could be justified to replace these with low-carbon systems. Careful consideration is needed to ensure the fund remains aligned with its decarbonisation objectives while recognising the distinct needs of these households.

### Question 19

Should those with multiple occupied properties e.g. holiday homes be eligible to apply for support for more than one property?



No

Please give reasons for your answer.

Those with multiple occupied properties, such as holiday homes, should not be eligible to apply for support for more than one property. Public funding should prioritise primary residences, particularly for low- and middle-income households, to ensure equitable access and maximise the societal and environmental impact of the scheme.

Supporting holiday homes could divert limited resources away from those most in need and reduce the scheme's overall effectiveness in addressing decarbonisation goals.

### Question 20

Do you agree that the department has a requirement for consumer protection measures to be associated with support for low carbon heating technology?



Yes

Please give reasons for your answer.

SNIPEF agrees that consumer protection measures should be integral to any support for low-carbon heating technology. Ensuring high-quality installations, safeguarding consumer trust and protecting public investments are critical for the success of such schemes.

SNIPEF members are ideally placed to contribute to these goals, as they undergo rigorous vetting, must meet stringent qualification standards and adhere to a robust complaints process.

This guarantees professional installations and provides consumers with confidence in the technology and its long-term performance. Integrating these standards into the programme would enhance quality assurance and accountability.

## Question 21

What do you feel would be the best method of consumer protection?

☐

Option A - Need for installers to be registered to a certification scheme such as MCS.

☐

Option B - The department to set its own consumer protection requirements.

☒

Option C – Other

Please give reasons for your answer.

If you chose Option B or Other, what consumer protection requirements should be specified?

SNIPEF believes the best method of consumer protection is to combine recognised certification schemes, such as MCS, with membership in trade associations or professional bodies that uphold rigorous standards of professionalism, competency and accountability.

While MCS certification provides a robust framework for quality assurance and installation standards, membership in trade associations like SNIPEF adds an additional layer of consumer protection. Trade associations ensure their members undergo rigorous vetting, hold accredited qualifications and commit to continuous professional development. They also provide essential consumer safeguards, including robust complaints handling systems and adherence to strict codes of conduct.

This combined approach ensures that installers meet the highest standards, protecting consumers from substandard installations and fostering trust in low-carbon technologies. Many SNIPEF members are already MCS certified, further demonstrating their commitment to professionalism and quality.

We strongly encourage the Northern Ireland Executive to engage with organisations like SNIPEF and incorporate both certification schemes and trade association membership into consumer protection requirements. This dual approach will ensure consistent quality, accountability, and consumer confidence while driving the successful adoption of low-carbon heating technologies.

## Question 22

If it is required for installers to be accredited to a certification scheme in order to take part in any future government support, should funding be made available towards certification fees?



Yes

Please give reasons and evidence to support your answer.

Funding should be made available to cover certification fees if accreditation is required for installers to participate in future government support schemes. This approach removes financial barriers, particularly for smaller businesses, and encourages more installers to become certified, expanding the pool of qualified professionals and ensuring high standards across the sector.

In Scotland, the Energy Saving Trust administers the MCS Certification Fund, which provides grants covering 75% of certification fees (up to £1,000) for heat pump installations. A similar initiative in Northern Ireland would support installers in aligning with required standards and accelerating the adoption of low-carbon heating systems.



### Question 23

Should any electrical work completed as part of the low carbon heating technology installation be required to be certified by an approved accredited body?

☒

Yes

☐

No

Please give reasons and evidence to support your answer.

All electrical work should be certified by an approved accredited body to ensure safety, compliance with regulations and consumer confidence in low-carbon heating technology installations.

## Theme 4: Financial Assistance

### Question 24

Do you agree with the criteria for the administration of support for low carbon heating technologies?



Yes

If no, please give reasons for your answer.

SNIPEF agrees with the criteria for administering support for low-carbon heating technologies.

However, we recommend that payments under the scheme be made directly to contractors, as seen with the Boiler Upgrade Scheme in England. This approach avoids the issues observed with Home Energy Scotland, where routing payments through consumers has caused delays and financial strain for installers.

Direct contractor payments streamline the process, ensure timely remuneration and enhance overall scheme efficiency, benefiting both contractors and consumers. This adjustment would further support the scheme's goals by encouraging contractor participation and maintaining a high standard of delivery.

### Question 25

Do you agree with the approach to offer support by providing a one-off capital grant?



Yes

If no, please give reasons for your answer.

### Question 26

Which option do you think should be the approach to the level of financial support for eligible technologies? Please tick one box only.

- ☐ Option 1 – apply the same amount of funding for all eligible technologies.
- ☒ Option 2 – apply different amounts of funding per eligible technology type.
- ☐ Option 3 – other (please specify).

Please give reasons for your answer.

SNIPEF believes that funding levels should reflect the varying costs and benefits of eligible technologies.

Tailored funding ensures equitable support, maximises the adoption of diverse technologies, and encourages consumers to choose the most suitable solution for their property. This approach also ensures public funds are used efficiently, aligning support with the specific requirements of each technology.

### Question 27

Are there any cost barriers beyond the cost of the technology that you feel may impact on the successful rollout of low carbon heating technology support?

- ☒ Yes

Please give reasons for your answer.

Beyond the cost of technology, assessment and certification fees, such as energy assessments pose significant barriers to adoption. Additionally, many homes require energy efficiency upgrades, like insulation, to optimise low-carbon heating systems, further increasing costs.

Installation expenses, particularly for retrofitting older properties, can also be prohibitive, especially when upgrades to pipework etc are needed. Addressing these barriers is essential for the successful rollout of low-carbon heating technologies.

### Question 28

Do you have suggestions as to how the department can ensure financial support delivers the best possible value for money?



Yes

Please give reasons for your answer.

The department must prevent large companies from dominating funding by implementing rigorous and impartial assessments of installations based on need and suitability. Involving contractors in the process ensures the use of practical expertise, and trade association or professional institution standards should be applied to guarantee quality and consumer confidence.

Transparent oversight and audits of installations are essential to avoid misuse of funds. Additionally, prioritising local installers and SMEs will help support the wider industry, promote competition, and ensure funding benefits communities equitably.

This approach balances fairness, efficiency and high-quality outcomes..

## Theme 5: Supply Chain and Skills

### Question 29

Is the supply chain and manufacturing base in NI well established to cope with demand for installations of low carbon heating technologies if demand increases?



No

Please give reasons for your answer.

The supply chain and manufacturing base in Northern Ireland is not yet well-established enough to fully cope with a significant increase in demand for low-carbon heating technologies.

While skilled professionals, including many SNIPEF members, and some local manufacturing capacity, the sector lacks the scale and workforce readiness needed for large-scale adoption. Challenges include a shortage of installers, limited production of key components, and logistical difficulties, particularly in rural areas.

SNIPEF advocates for investment in skills training, upskilling the workforce, and expanding the supply chain to address these challenges. The Republic of Ireland offers a valuable model by compensating small businesses for training time, providing 500 Euro per day to encourage micro and small companies to upskill.

Implementing similar measures in Northern Ireland would encourage smaller firms to invest in their skills and capacity, ensuring they can effectively meet future demand. A coordinated approach to training, supply chain development, and industry incentives is essential to ensuring the successful rollout of low-carbon heating technologies across Northern Ireland.

### Question 30

Is there any evidence of after-care delays with repairs and maintenance of heat pumps due to supply chain shortages and delays that may cause someone to be without heating?



No

If yes, please provide evidence.

### Question 31

How can growth of the skills base within the heat pump industry be supported by the private sector and government to complement any support for low carbon heating in

- a) the short – medium term (up to 10 years) and
- b) the long term (over 10 years)?

Please provide any evidence you may have.

The growth of the skills base within the heat pump industry requires strong collaboration between the private sector and government. In the short- to medium-term, funding should focus on upskilling existing tradespeople, such as plumbing and heating professionals, through targeted training programmes.

Organisations like SNIPEF, which manages plumbing and heating apprenticeship in Scotland, can play a vital role by integrating heat pump modules into current qualifications.

Financial incentives for employers to take on apprentices specialising in low-carbon technologies would accelerate this transition.

In the long term, embedding low-carbon heating skills into school-level STEM education and expanding apprenticeship opportunities are crucial.

SNIPEF's expertise in managing apprenticeships highlights the importance of integrating practical and theoretical learning to prepare the next generation for careers in the profession.

### Question 32

Is there an adequate amount of heat pump installers within NI to cope with demand for installations as well as aftercare and repairs/maintenance should demand for heat pumps increase in the short – medium term?



No

Please give reasons for your answer.

Northern Ireland currently lacks an adequate number of heat pump installers to meet the increased demand for installations, aftercare and maintenance. Significant investment in training, upskilling and apprenticeship programmes is needed to address this skills shortage.

### Question 33

What actions can be taken to support the scaling and growth of the low carbon industry, particularly installers, to meet future demand projections of heat pump deployment targets?

Please give reasons for your answer.

SNIEF, as the leading trade association representing the plumbing and heating profession in Scotland and Northern Ireland, plays a critical role in driving the growth of the low-carbon heating industry. With extensive experience in training and managing apprenticeships, SNIEF provides valuable insights into how the industry can scale effectively to meet future demand.

Meeting ambitious heat pump deployment targets requires expanding and funding apprenticeships. SNIEF oversees the Modern Apprenticeship in Plumbing & Heating in Scotland, which includes low-carbon heating modules. Increased government funding for apprenticeship placements and employer grants would drive recruitment and training of skilled workers. Financial support covering certification and training fees, particularly for SMEs, is also vital to remove barriers and build capacity across the sector.

Upskilling the existing workforce is equally important. Accessible, subsidised short courses tailored to industry needs would rapidly expand the pool of qualified professionals. Collaborating with organisations like SNIEF ensures training programmes align with industry standards and meet market demand.

Consumer confidence is fundamental to growing low-carbon heating systems. SNIEF has long advocated for robust certification schemes, such as the Microgeneration Certification Scheme. Financial assistance for installers to achieve and maintain certification would ensure quality, compliance and competitiveness in the market. SNIEF's professional standards make it a trusted partner in promoting certification adoption and maintaining consumer trust.

Scaling the low-carbon heating industry requires a holistic approach integrating workforce development, supply chain investment and consumer engagement. SNIEF's expertise and established networks with contractors and training providers position it as a key partner in developing industry growth strategies.

By fostering cooperation among government, private sector stakeholders and trade organisations, the industry can effectively address workforce capacity, supply chain resilience and consumer confidence, advancing decarbonisation goals.



## Privacy Notice

**Data Controller Name:** Department for the Economy  
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