**Heat & Energy Efficiency Technical Suitability Assessment**

**Consultation response**

**Submission deadline**: 29 August 2025

**Link to HEETSA consultation**: [HERE](https://consult.gov.scot/heat-in-buildings/technical-suitability-assessment-scoping/)

**Summary to HEETSA and the consultation**

The Scottish Government is proposing a new technical assessment framework called the Heat and Energy Efficiency Technical Suitability Assessment (HEETSA). This assessment is aimed at building owners who are seeking more detailed and tailored advice on energy efficiency and clean heating options**. It is positioned as a step beyond the EPC**, **particularly for complex buildings such as traditional, rural, tenement and protected properties.**

Unlike EPCs, which rely on visual inspections and assumptions, HEETSA would involve a modular assessment of the building fabric and heating system, with the aim of identifying what measures are technically suitable or unsuitable. The process will include optional modules for communal heating, whole building retrofits, and traditional buildings, in addition to core modules on insulation and individual heating systems. It is proposed that assessors will consider logistical constraints, installation costs, payback periods, and potential risks like condensation or damp.

Assessors are expected to be properly skilled and qualified, though specific requirements are still under consultation. The government intends to approve a range of methodologies and assessor accreditation schemes, similar to how it oversees EPCs. **HEETSA would not cover the design or installation of measures, which would remain the responsibility of certified installers under schemes like MCS and TrustMark.**

**Possible issues**

I am not fully clear on the current relationship between EPC assessors and SNIPEF members as installers, or whether there is an established process for collaboration or resolving discrepancies in assessments.

As such, some of the following points may not pose a direct issue in practice. However, based on my reading of the consultation, I believe these areas have the potential to become problematic for the profession and warrant close attention or, at least, input into the consultation:

1. **The HEETSA proposal focuses heavily on assessment and consumer protection, with little recognition of the expertise and responsibility of professional installers.** This creates a risk that decisions influencing funding and technical direction will be made without input from those who design, specify, and install systems. HEETSA assessments may become a requirement for Home Energy Scotland funding, reinforcing this concern.
2. **There is a risk that HEETSA assessors could recommend heating technologies, such as heat pumps, without conducting full design or heat loss calculations.** If these recommendations shape funding decisions or customer expectations, SNIPEF members may be forced to correct or contradict flawed advice, leading to delays, disputes, or lost work.
3. **SNIPEF should advocate that only qualified heating professionals contribute to any part of the assessment involving heating system suitability**, and that their input is formally recognised in government funding or regulatory decisions. Given the cost and complexity of clean heating systems such as heat pumps, it is essential that any assessment of technical suitability includes professional input from qualified installers who are ultimately responsible for design and performance.
4. **There is currently no clear mechanism for installers to challenge or amend flawed HEETSA assessments**. Introducing such a process would be essential to protect consumers, ensure system performance, and uphold technical integrity.

**Consultation questions**

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|  | **To what extent to you agree or disagree that it would be valuable for the Scottish Government to develop a HEETSA (a government-led approval and accreditation mechanism to provide oversight and standardisation of the retrofit assessment market)?**   * **Strongly agree** * **Mostly agree** * **Neither agree nor disagree** * **Mostly disagree** * **Strongly disagree** * **Don’t know** |
| **Answer** | **MOSTLY AGREE:**  The Scottish and Northern Ireland Plumbing Employers’ Federation (SNIPEF) recognises that HEETSA could add value by addressing the well-known shortcomings of EPCs and by providing consumers with clearer, step-by-step guidance on improving their homes.  For HEETSA to deliver this value, it must build on existing frameworks and complement, rather than replace, EPCs. EPCs provide broad consumer guidance, while qualified installers bring the technical expertise needed to design and deliver practical solutions. A proportionate approach could be to enhance EPCs into an “EPC+” model, but if a new HEETSA framework is introduced it must integrate installer input as a core element.  A key concern is that assessors may recommend technologies, such as heat pumps, without carrying out the full design calculations or feasibility checks required. To avoid conflicts and protect consumers, professional installers must be able to engage with assessors, challenge flawed recommendations, and have their expertise formally recognised in the process.  Affordability is also critical. Commercial retrofit assessments already exist in the market at a typical cost of around £400. If HEETSA becomes a government-required assessment, pricing safeguards must be in place to prevent price gouging and ensure fair, affordable access for households.  Finally, SNIPEF recognises that HEETSA presents an opportunity for Scotland to move beyond the limitations of the UK-controlled EPC system and establish a Scottish-led framework. If linked to Home Energy Scotland funding, HEETSA could create a stronger, more coherent pathway for households to access support and implement improvements. We hope that this is the primary reasoning for this course of action and not simply to wrest EPC control from Westminster. |
|  | **If the Scottish Government develops a HEETSA, which of the following should it cover (select all that apply):**   * **Retrofit assessment (i.e. identifying whether measures are present or can be installed)** * **Retrofit design (identifying the types of measures (e.g. loft insulation) that can be installed)** * **Retrofit specification (identifying the products or materials (e.g. mineral wool) that can be installed) Installation (identifying the relevant installation standards)** * **Evaluation (planning an approach to evaluating the impact of measures)** * **Occupancy (including factors related to the building’s current occupancy in assessment of suitable measures)** * **Other – please specify** |
|  | SNIPEF would recommend:   * Retrofit assessment * Retrofit design * Occupancy   HEETSA should focus on retrofit assessment, ‘high-level’ design options, and consideration of occupancy to guide what measures may be technically suitable. This would provide consumers with clearer, step-by-step advice on how to improve their homes, addressing a gap not currently met by EPCs.  However, specification, installation standards, and evaluation should remain the responsibility of certified installers. These areas require professional design expertise and are already covered by schemes such as MCS and TrustMark, which include redress mechanisms, complaint handling, and standards enforcement.  HEETSA should complement, not duplicate or undermine, these existing protections. It should build on current frameworks, in the spirit of an “EPC+” approach, rather than creating overlap or confusion in roles.  Finally, it is also important that HEETSA does not impose a mandatory order of recommendations that reduces consumer options. Households should always take expert advice seriously, but final decisions should remain theirs, supported by the judgement of qualified professionals. A rigid order of works risks creating frustration or barriers to action, while a flexible, impartial plan empowers consumers to move forward at a pace and budget that suits them. |
|  | **Which delivery model do you think would be most appropriate for HEETSA?**   * **Direct Government accreditation of assessors** * **Government accreditation of assessor organisations who in turn accredit assessors** * **HEETSA as guidance only without Government accreditation of assessors** * **Other – specify** |
|  | SNIPEF would recommend:   * Government accreditation of assessor organisations who in turn accredit assessors   SNIPEF would recommend government accreditation of assessor organisations who in turn accredit assessors. This model strikes a balance between oversight and practicality. It allows the Scottish Government to set consistent standards and retain control over quality, while enabling experienced organisations to manage day-to-day assessor accreditation.  It mirrors established models such as MCS and TrustMark, which provide structured, accountable frameworks. A comparable example already exists in Scotland through SNIPEF’s Approved Certifier of Construction Scheme (ACCS), which demonstrates how government-approved organisations can successfully deliver accreditation and oversight in a technically complex area.  It is essential that assessor competence requirements explicitly include practical knowledge of building services and low carbon heating systems, not just general surveying skills. There must also be a clear, formal process for professional installers to engage with, or challenge, assessment outcomes where appropriate.  Finally, SNIPEF is also concerned that introducing HEETSA into a marketplace already experiencing significant workforce shortages could make delivery challenging. In the longer term, digital tools and AI may help address capacity by supporting consistency, reducing duplication, and assisting assessors. However, these technologies must sit alongside professional oversight, with final accountability remaining with qualified individuals. |
|  | **What methodologies would be needed to meet the requirements of a HEETSA? Please name existing methodologies that could be used and highlight any gaps that you think should be filled with new methodologies.** |
|  | A HEETSA would require methodologies that assess both the building fabric and heating system suitability. However, no single methodology can replace the detailed heat loss calculations and associated heating system design processes, including low temperature design, which are carried out by qualified installers under recognised schemes such as MCS.  It is therefore vital that HEETSA is positioned as an informed guidance tool for consumers and funders, providing more detail than EPCs, but not as a replacement for professional system design or specification. Where heating systems are involved, HEETSA methodologies must stop short of design detail and instead focus on whether measures are technically feasible in principle.  Digital modelling tools and emerging technologies such as AI will increasingly be used to support assessments by providing building-specific data and scenario analysis. These tools can improve consistency and efficiency, but they must be applied within a framework that recognises their limitations. The outputs of such systems still require interpretation by competent professionals, and final decisions on design, safety and performance must remain with qualified installers.  Traceability will also be essential. Consumers must be able to see clearly who carried out the assessment, who made particular recommendations, and what level of competence or accreditation they hold. This will build trust in the process, provide accountability in the event of disputes, and mirror the approach already in place under MCS, where every installation can be traced back to the responsible professional.  Impartiality is important, but it also creates a challenge. While assessors should provide the independent framework for consumer advice, they may not always have the technical depth to overrule an installer’s professional design judgement. A fair resolution mechanism is needed so that HEETSA assessments guide funding and consumer decisions, while installer expertise remains decisive for design, safety and performance. |
|  | **There are a range of ways that identified gaps could be filled – by the market, or by the Scottish Government procuring and developing methodologies to do this. What do you think is the best approach to filling identified gaps in the methodologies required for HEETSA?** |
|  | A mixed approach is the most appropriate way to fill any gaps.  Where suitable methodologies already exist, such as those used under MCS and other recognised schemes, the Scottish Government should endorse and integrate them into the HEETSA framework. Where gaps remain, government-led development will be necessary but this must be carried out in close consultation with industry. This will ensure that any new methodologies are technically sound, practical to apply, and aligned with existing professional standards. In this way HEETSA can provide added value without creating duplication or undermining the responsibilities of professional installers. |
|  | **What skills and qualifications should be required to undertake a HEETSA?** |
|  | For assessments involving low carbon heating systems it is essential that assessors demonstrate knowledge equivalent to that of a qualified heating installer. This competence should be evidenced through recognised schemes such as MCS, which ensure expertise in areas such as system design, specification and performance.  Without practical installation experience or design training there is a risk that assessors could provide advice that is technically flawed, impractical or misleading. To safeguard quality, assessors must either be upskilled to understand the principles of system design or collaborate directly with qualified heating professionals where heating systems are assessed.  As digital modelling tools and AI become more common in building assessments, it is also important that assessors are trained to use these tools appropriately and to interpret their outputs correctly. Technology can support consistency and efficiency, but it cannot replace the practical knowledge and accountability of installers. Assessors must therefore combine digital capability with professional competence to provide advice that is impartial, technically sound and aligned with real-world installation practice.  Where heating systems are considered, assessors must hold certified training in low carbon technologies and be recognised by professional trade bodies such as SNIPEF. This will ensure that HEETSA assessments reflect both impartiality and the technical competence required to deliver reliable advice to consumers and funders. |
|  | **Which of the following statements comes closest to your view:**   * **It is feasible for an individual assessor to have sufficient skills and knowledge to complete a HEETSA** * **A HEETSA would require input from multiple specialists and could not be completed by an individual** * **Don’t know** * **Other** |
|  | **A HEETSA would require input from multiple specialists and could not be completed by an individual.**  A HEETSA would require input from multiple specialists and cannot realistically be completed by a single assessor. The range of technical areas covered, particularly where heating systems are involved, makes it unlikely that one person could provide the necessary depth of knowledge across all subjects. A multidisciplinary model is therefore essential, with contributions from qualified heating professionals to ensure advice is accurate, practical and aligned with real-world installation practices, unless the assessment is limited to providing only a high-level overview.  Digital modelling and AI tools can assist this process by improving efficiency and consistency. At present their outputs must always be checked and validated by competent professionals to ensure accuracy and practicality. In future, these technologies may reduce the need for multiple specialists to contribute to every assessment, but for now professional oversight remains essential to maintain accountability and consumer confidence.  Traceability is also critical. Consumers must be able to see clearly who provided each element of advice and what qualifications or accreditation underpinned that contribution. This accountability will protect consumers, maintain trust in the process and safeguard professionals by ensuring their input is properly recorded.  Impartiality safeguards are important, but they must not prevent meaningful collaboration between assessors and installers. Assessors can indicate whether a technology, such as a heat pump, may be suitable in principle, but responsibility for design detail, specification and performance must remain with qualified installers. This ensures consumers receive clear advice while keeping technical accountability with those who carry liability for system delivery.  Affordability also needs attention. Commercial equivalents of these types of assessments are typically available for around £400. If HEETSA becomes a government requirement, pricing safeguards should be in place to prevent excessive costs and to ensure households have fair access to impartial, good-quality advice. |
|  | **To what extent do you agree or disagree that non-personal data gathered through a HEETSA should be stored to form part of a ‘building logbook’ or ‘green building passport’?**   * **Strongly agree** * **Mostly agree** * **Neither agree nor disagree** * **Mostly disagree** * **Strongly disagree** * **Don’t know** |
|  | **STRONGLY AGREE**.  The Scottish and Northern Ireland Plumbing Employers’ Federation (SNIPEF) supports the development of a building logbook or green building passport as a tool to track improvements, support compliance and reduce duplication of effort. Storing non-personal HEETSA data in a structured format would improve transparency, assist future planning and help consumers understand the history of their property.  It would also support installers by providing accurate records of previous works and assessments, reducing the risk of inappropriate recommendations and helping ensure new measures are properly integrated with what is already in place.  To be effective, the logbook must be accurate, accessible and designed in a way that can be used both by consumers and by certified professionals. Over time, this would build a reliable record of retrofit progress, strengthen consumer confidence and support the achievement of long-term energy efficiency and decarbonisation targets.  In addition, the structured collection of HEETSA data would create opportunities for innovation. Digital modelling and AI could use this information to generate more accurate, tailored advice for households, further improving the quality and consistency of retrofit planning while keeping professional oversight at the centre of decision-making. |
|  | **To what extent do you agree or disagree that the HEETSA assessor should be required to be independent of the outcome of the assessment? E.g. they could not financially gain from the outcome if a measure is stated as technically suitable.**   * **Strongly agree** * **Mostly agree** * **Neither agree nor disagree** * **Mostly disagree** * **Strongly disagree** * **Don’t know** |
|  | **MOSTLY AGREE**. Independence is essential to maintain trust in the HEETSA process and to protect consumers from any perception of bias. Assessors should not financially benefit from recommending particular measures, as this would undermine confidence in the impartiality of the advice.  At the same time, independence must not prevent collaboration with qualified installers. Installers have the technical responsibility for design, specification and performance, and their expertise must be integrated into the process without creating a conflict of interest. The boundary should be clear: assessors provide impartial advice on what is technically suitable in principle, while installers remain responsible for design and delivery.  Digital modelling and AI tools may help strengthen impartiality by applying consistent methodologies across assessments. However, the outputs of these tools still require interpretation and validation by competent professionals. Independence of assessors therefore remains important, but it must sit alongside strong technical competence and close working with the installer community. |
|  | **Thinking about the relationship between the EPC and HEETSA, which of the following statements comes closest to your view:**   * **The results of a HEETSA should result in the production of a revised EPC as part of its output** * **The results of a HEETSA should be made available to inform the production of a revised EPC and should be considered acceptable ‘documentary evidence’ to override default values.** * **The results of a HEETSA should not have any influence on the EPC and its ratings** * **Don’t know** * **Other** |
|  | **The results of a HEETSA should be made available to inform the production of a revised EPC and should be considered acceptable documentary evidence to override default values.**  EPCs provide a standardised rating which is widely understood by consumers, funders and regulators. However, they are often criticised for relying on assumptions and visual inspections, which can lead to inaccuracies. Allowing verified HEETSA results to feed into EPCs would improve their accuracy without changing their core purpose.  HEETSA and EPCs should therefore be seen as complementary tools. The EPC provides a broad consumer rating, while HEETSA offers deeper technical guidance. Integrating the two in this way would avoid duplication, improve consumer understanding and provide funders with more reliable data while still recognising the different roles each tool plays. |
|  | **Thinking about presenting the results of a HEETSA, please give your view on:**   1. **HEETSA should result in a standardised certificate or report?**  * **Strongly agree** * **Mostly agree** * **Neither agree nor disagree** * **Mostly disagree** * **Strongly disagree** * **Don’t know**  1. **What information should be included when presenting the results?** |
|  | **STRONGLY AGREE**.  A standardised HEETSA certificate or report would provide consistency, improve trust in the process and make it easier for consumers, funders, installers and regulators to interpret and act on the findings.  The report should include a summary of the building’s current condition, identification of technically suitable and unsuitable measures, the reasoning for recommendations, and any logistical constraints. It should also provide indicative cost ranges and payback periods, while making clear the limitations of these figures. Importantly, the report must contain a clear statement that HEETSA does not constitute a detailed system design or installation specification.  This approach would give consumers better-informed guidance than EPCs while ensuring that final system design and compliance remain the responsibility of certified professionals under existing schemes such as MCS and TrustMark. |
|  | **Please provide details of any circumstances in which you think a HEETSA should be required, and the reasons for your view.** |
|  | A HEETSA would be appropriate where more detailed and impartial advice is needed to support complex retrofit decisions, for example in traditional, rural, or multi-unit properties where EPCs provide insufficient detail. It may also be appropriate where consumers proactively request a more in-depth assessment.  If the Scottish Government intends for HEETSA to become a requirement for funding, such as through Home Energy Scotland, this must be clearly defined and supported by strong technical standards. However, HEETSA should not be a blanket requirement for all retrofit projects. Straightforward measures, such as loft insulation or window replacement, should not be delayed or made more expensive by requiring a HEETSA where the need for assessment is minimal.  Affordability is essential. Commercial equivalents of detailed assessments are already available for around £400, which has established a benchmark for what consumers view as reasonable. If HEETSA becomes a government-mandated requirement, safeguards should be in place to prevent excessive costs and ensure households are not priced out of accessing support.  Ultimately, HEETSA should be required only where it adds clear value, by providing impartial, technically sound advice that complements, rather than duplicates, the responsibilities of certified installers. |
|  | **Do you think it is necessary to develop a legal basis for HEETSA (i.e. should HEETSA be underpinned by regulations in a similar manner to EPCs)?**   * **Yes** * **Don’t know** * **No** |
|  | **Yes.** If HEETSA is to influence funding eligibility, exemptions or consumer protection, it must be underpinned by a clear legal basis in the same way EPCs are. A statutory footing would ensure consistency, accountability and public confidence in the process.  Without regulation there is a risk of variation in assessments, weak oversight and reduced trust in HEETSA outcomes, which would undermine both consumer protection and the work of professional installers.  If HEETSA becomes a requirement for access to Home Energy Scotland funding, the case for regulation becomes even stronger. A clear legal basis would ensure fair treatment of consumers, prevent poor-quality or inconsistent assessments, and provide confidence to funders, regulators and industry alike.  It will also be important to make clear that while HEETSA reports may suggest a logical order of measures, this should not become a mandatory sequence that removes consumer choice. Households should retain the ability to act flexibly, guided by professional advice, rather than being locked into a rigid order of works dictated by regulation. |

**Richard Campbell**

25 August 2025