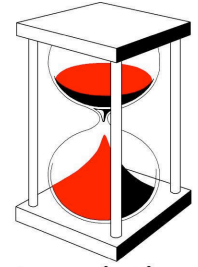




**Friends of
the Earth
Scotland**

Consultation on “Energy Efficiency & Microgeneration: Achieving a low carbon future – A strategy for Scotland”

A response from Friends of the Earth Scotland and the Association for the Conservation of Energy



**Association
for the
Conservation
of Energy**

1. Introduction

Friends of the Earth Scotland is an independent member of the Friends of the Earth International network. We undertake research, advocacy and community development activities throughout Scotland in pursuit of environmental justice and sustainability.

The Association for the Conservation of Energy (ACE) is a lobbying, campaigning and policy research organisation, and has worked in the field of energy efficiency since 1981. Our lobbying and campaigning work represents the interests of our membership: major manufacturers and distributors of energy saving equipment in the United Kingdom.

We welcome the opportunity to comment on these proposals.

2. Summary of main points

The strategy should deliver a step change in Scotland’s use of energy, and must:

- Address the long-standing legacy of inaction and lack of resources in this area that has left Scotland behind other small European nations and our competitors.
- Recognise the level of action that is necessary if fuel poverty and climate change targets are to be achieved and sell the positive and economic benefits to both the public and private sector.
- Contain a range of high level targets, which should include:
 - New buildings to be very low or zero-carbon in use by 2016 at the latest.
 - Emissions reductions from the Executive’s own estate of at least 5 percent per annum.
 - At least 40,000 homes per year to be built or renovated to require very low or zero space heating demand by 2011 at the latest.
 - A minimum NHER for the Scottish housing stock of 7 and a target mean NHER of 8.5 by 2016 at the latest.
 - Carbon emissions from the built environment should be reduced by a minimum of 3 percent per annum.
- Identify and allocate the resources to deliver these targets through expanding existing programmes such as Scottish Community Householders Renewables Initiative (SCHRI), Loan Action Scotland etc and creating major new funds for the comprehensive upgrading of existing housing stock that matches the best schemes in Europe.

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3. Specific questions

3.1. Do you agree with the overall approach taken in this draft strategy for improving energy efficiency and encouraging greater uptake of microgeneration? If not, why not?

We agree with the basic shape of the approach taken, within the constraints imposed by the lack of key policy tools, such as fuel or energy taxation, at the Scottish level. We specifically agree with the need to set targets for energy efficiency and microgeneration, together with an action plan to deliver those targets. We also agree that targets should be expressed in the form of carbon savings; that these targets should complement any national or longer-term carbon targets; and that in addition to an overall energy efficiency target and a separate microgeneration target, the Executive should also set sectoral targets for energy efficiency. In addition, we agree that there should be annual reporting on progress towards the targets – indeed, we would also argue for an annual debate in parliament on that annual report.

3.2. Do you have any views on the key actions covered in the draft strategy summarised in Chapter 8 – Conclusions and Next Steps?

Our comments on each of the key actions are as follows:

3.2.1. Introduce a one stop shop approach to advice and support for householders on energy efficiency, sustainable transport and renewable energy.

We fully support the idea of a one stop shop where individuals and households can get advice on energy efficiency, sustainable transport and renewable energy. In order to change behaviour to the extent that is required, it is vital that these three areas are tackled together and that people are given clear, simple information showing the immediate benefits of changing their behaviour.

Friends of the Earth Scotland supporters, and members of the public who contact us, frequently tell us that what they want is advice that is specific to their home and patterns of energy use, rather than general information or advice; and from a source of information that is independent of any manufacturer or installer. There is also clearly a growing appetite for microgeneration on the part of householders who are finding that the current Energy Efficiency Advice offices are not always well enough equipped to give them the detailed advice on this that they require. **We therefore support the proposal to modify the current system of Energy Efficiency Advice offices to become a Sustainable Energy Network.**

We recommend that an effective way to ensure that householders act on the information they are given would be to allocate them a personal advisor who would advise on all three areas, rather than a different advisor for each. It will be very important to ensure that the advisors are not just trained in sustainable energy but also in how to inspire and motivate people to change their behaviour. The one-stop-shops should not only offer advice and support, but also information on grants, loans and other financial incentives available. In addition, they should cater for the SME sector as well as for householders.

Over the longer term, we believe the Executive should consider a mandatory programme of energy audits, to supplement the coming requirements for energy performance certificates at the point of sale or letting.

In addition the Executive should explore how it could best support and enable the rapid roll-out of smart metering across the Scottish building stock, to both improve energy information to occupants and enable wider introduction of microgeneration.

3.2.2. Set energy efficiency targets for housing

We warmly welcome a target for the improvement of energy efficiency in housing. We note that in 2002 the Cabinet Office Performance and Innovation Unit (PIU) recommended a 20

percent improvement in domestic energy efficiency by 2010 and a further 20 percent improvement by 2020, and that the likely benefits of such a target ran to 0.25 percent of GDP by the latter dateⁱ. We also note that in England, the 2004 Housing Act set a statutory target for a 20 percent improvement in domestic energy efficiency on 2000 levels by 2010. We are very pleased to hear, therefore, that Scotland will not allow itself to be left behind in this regard.

We would like to take this opportunity to correct an inaccuracy which appeared in the consultation document: in paragraph 19 of the Executive Summary and point 6.3 of the main document it is claimed that the 2002 spending review set a target to improve domestic energy efficiency by 20 percent by 2006. This is not the case. The actual target was expressed as follows:

“By 2006 reduce the number of houses with poor energy efficiency by 20%.”ⁱⁱ

Since ‘poor energy efficiency’ is generally taken to mean NHER scores of 0 to 3, reducing the number of houses in this category by 20 percent is not the same as improving the overall energy efficiency levels of the Scottish housing stock by 20 percent. The latter target is considerably more ambitious.

We suggest the Executive sets a target of a minimum NHER of 7 over the entire Scottish housing stock by 2016 at the latest. This would help the Executive to achieve its 2016 fuel poverty target on time, since according to Energy Action Scotland, the national charity working to eliminate fuel poverty, an NHER score of at least 7 is required to ‘fuel poverty-proof’ a Scottish homeⁱⁱⁱ. In order to achieve this NHER 7 minimum, we suggest that the Executive aims for a mean NHER of 8.5 by 2016. According to the Scottish House Condition Survey, the mean NHER in 2002 was 4.5, which suggests that the mean NHER of the Scottish housing stock must improve by 4 NHER points in 14 years, or 89 percent. Needless to say, this will require considerable investment. This also has implications for improving the current NHER requirement under the Scottish Housing Quality Standard.

FoES members highlighted the importance of legal reforms to back up such a target, in particular to enable improvements in tenements^{iv}, and to regulate efficiency improvements in the private rented sector (in excess of energy performance certificates), including through measures for the service and implementation of statutory energy repair notices.

3.2.3. Consider options for financial and other incentives to encourage householders to improve the energy efficiency of their homes.

We very much support the introduction of financial and other incentives to encourage householders and those in the SME sector to improve energy efficiency. ACE has long campaigned at Westminster for stamp duty rebates for householders installing energy efficiency measures in their homes. We are deeply disappointed that the Treasury appears to have ignored these calls. Since most fiscal measures are reserved, we very much hope that the UK government will see the value in encouraging energy efficiency in this way.

In a devolved setting, there should be an opportunity for local authorities to **offer council tax rebates to householders, and business rates rebates to businesses installing energy efficiency or microgeneration measures.** Research by the Energy Saving Trust suggests this could be highly effective in increasing uptake, and on a UK basis has the capacity to save 0.29 MtC per year^v. However, we understand that changes to local authority legislation are required in order to facilitate this, and urge the Executive to bring forward early legislation to enable this.

We also note that Germany has a highly-successful system of low-interest loans of up to €50,000 (around £34,000) for those in pre-1978 homes to allow them to invest in bringing their

homes up to current energy efficiency standards^{vi}. This is the main mechanism through which the government intends to improve 5 percent of pre-1978 stock up to modern standards each year. This is a highly ambitious scheme to drastically improve the energy efficiency levels in the domestic sector, and is not restricted to those in receipt of benefits or over a certain age: it is a universal scheme. **We would strongly urge the Scottish Executive to consider a similar low-interest loans scheme for householders, which could have a revolutionary effect on domestic energy efficiency.**

3.2.4. Invest a further £2m in support for microgeneration for householders and communities.

The Scottish Community and Householder Renewables Fund (SCHRI) currently has £3.7 million per year at its disposal^{vii}. Until such time as take-up of microgeneration reaches the point at which the economies of scale bring the unit cost of microgeneration technologies down to a far lower level, we believe that grant funding for households and communities wishing to retrofit buildings is a very important part of the strategy. It is particularly helpful to deliver improvements in hard-to-treat properties such as tenements through community based schemes. We note that the SNP manifesto pledges to: “quadruple the financial support for family and community microgeneration schemes”. **We fully support this increase in SCHRI funding to £14.8 million per year and would urge the SNP Government to commit to maintaining this as a minimum for each year of this Parliament**, since it is vitally important for the industry that any funding stream is consistent. We would also encourage the Executive to consider **doubling the maximum grant payable for households from the current 30 percent to a more generous 60 percent**, since this would help considerably to increase take-up; and to target funding appropriately to address otherwise hard-to-treat properties such as tenements. We look forward to an announcement on this in the first Executive budget. This would also make a significant contribution to the associated manifesto pledge to: “support the long-term deployment of energy generation and energy saving in one million Scottish homes”.

3.2.5. Continue our commitment to end fuel poverty by 2016 and test the impact microgeneration technologies have on tackling fuel poverty.

As mentioned above, substantial investment in domestic energy efficiency will be needed if the 2016 fuel poverty target is to be met.

We are supportive of the wider roll-out of micro-renewables to combat fuel poverty. The current fuel poverty / microgeneration pilot should help identify those technologies and circumstances where the best contributions can be made. Upon completion of the pilot, those technologies which have proved successful should be swiftly incorporated into a nationwide installation programme.

In parallel to the current pilot, which we understand focuses primarily on technologies to provide renewable heat, we suggest the Executive commission a further, wider study to investigate the effect that other technologies, such as community-scale or micro-CHP, as well as non-heat technologies in combination with heat technologies might have on reducing fuel poverty.

Investment in improving the energy efficiency of Scottish homes and in tackling fuel poverty need not necessarily come from the Scottish Executive budget. The Energy Efficiency Commitment, paid for by energy consumers, has previously required a high percentage to be spent in the so-called ‘priority group’, which includes those on low incomes. The recently-published consultation on the Carbon Emissions Reduction Target (previously EEC3) suggests that 40 percent of the target is achieved in the priority group. However, we would urge the Scottish Executive to ensure that Scotland is receiving its fair share of investment under this scheme. According to Ofgem, around 7 percent of investment under EEC1 was in Scotland, yet Scotland has 9 percent of the UK’s dwellings^{viii}. We are not aware of any assessment for EEC2, but would be surprised if it differed radically from EEC1. This

proportion does not seem appropriate to us: since Scotland has a colder climate than the rest of the UK, we suggest it is appropriate that it receives more than 9 percent of the EEC investment. We strongly suggest that the Scottish Executive raise this matter with DEFRA at the earliest opportunity.

3.2.6. Commit up to a further £2m to a loan fund for small and medium sized businesses.

We warmly welcome the additional £2m investment in ‘Loan Action Scotland’ announced in March. We also welcome the doubling of the maximum loan to £100,000 and the reduction in red tape associated with applying for the loan. This programme has been extremely successful at improving energy efficiency in the SME sector, and has also reduced business costs – a recent evaluation estimated lifetime savings of around £10m for Scottish businesses^{ix}.

However, we believe the reduction in maximum payback period from five years to four is very short-sighted: this will reduce the attractiveness of the scheme to businesses, and will also rule out the use of some of the less ‘mature’ technologies which might have a longer payback period. **We urge the Executive to consider extending the payback period for loans, and to further expand the loan fund.** In particular, additional effort must be made to market the scheme to small and medium-sized businesses.

3.2.7. Review resource efficiency initiatives and streamline support available to make it easier and clearer for businesses to take action.

We agree that information and financial incentives for businesses should be easier to access, and the bureaucracy associated with such schemes should be kept to a minimum. Small businesses in particular may currently fall under the remit of both the Energy Saving Trust and the Carbon Trust for energy efficiency advice, and **we suggest that merging these two organisations, or at the very least ensuring a ‘One stop shop’ approach with services from both organisations under the same roof**, as outlined above, would help to make information more readily available to the SME sector.

3.2.8. Set an ambitious single target for reducing carbon dioxide emissions from the Executive’s own activities and estate.

We support the setting of a single target for reducing carbon dioxide emissions from the Executive’s own activities and estate and are heartened by the aim that it be ‘ambitious’.

We note the SNP manifesto commitment to ensuring that, “Government, its agencies and other public bodies including the NHS and Local Authorities have a responsibility to take a lead.”^x on environmental impact. We also note the Treasury target for 5 percent annual administration savings, which the SNP have committed to. To complement this target, **we suggest the Executive set a target of a 5 percent per annum reduction in CO₂ emissions from its own activities and estate.**

3.2.9. Invest an additional £4m in the Central Energy Efficiency Fund for the further and higher education sector.

The additional investment in CEEF announced in March is very welcome, as is the extension of eligibility to include further and higher education institutions.

However, parliamentary written answer S2W-26313, answered on 13 June 2006, suggests that while more than 70 percent of the fund had been applied for at that stage, less than a third of the fund had actually been spent. This would seem to suggest that eligible organisations are not prioritising investment in energy efficiency measures. We are therefore pleased to hear that the Executive is considering ways to encourage uptake of the fund, including changing the structure to mirror the Carbon Trust’s successful Salix Fund. We have also heard some criticism of the scheme that it is particularly bureaucratic, and would encourage the Executive to explore ways to streamline the application process.

3.2.10. Set environmental performance targets for our NDPBs and agencies and targets for local authorities to reduce greenhouse gas emissions.

FoES believes that it is important to set NDPBs, agencies and local authorities targets for CO₂ reduction and for improvements in energy efficiency. We would suggest using the same 5 percent per annum target as mentioned above.

3.2.11. Seek ways to better promote energy efficiency and microgeneration through the public sector procurement process.

Public sector procurement is a powerful tool in the promotion of energy efficiency and microgeneration, because of the spending power involved and also because of the high visibility to the public of the action taken. We agree that this is an important area and that it is essential that the public sector leads by example.

The public private partnership (PPP) model of funding is not conducive to the adoption of more innovative or less standard technologies, for instance biomass boilers in new schools. Private consortia appear to be overly cautious and perceive a risk in designing, building and managing such buildings; this makes it difficult for public bodies to negotiate the use of such technologies into contracts. This matter needs urgent investigation and if necessary revision of the guidance governing such contracts. PPP must facilitate not hinder the roll out of zero carbon buildings, and do this cost effectively. If PPP does not demonstrate that it can be effective, other procurement measures such as trusts or conventional contracts must become the norm. In short, the Scottish Executive must throw down the gauntlet to the PPP consortia on the minimum energy efficiency standards that contracts must deliver before funding will be released to the commissioning authority. Furthermore, PPP has the added disadvantage that it reduces the flexibility to adapt and retrofit buildings as new technologies become available.

3.2.12. Encourage greater energy efficiency and uptake of microgeneration across the public sector estate, especially in schools and encourage every school register on the Eco Schools programme.

We welcome the commitment in the SNP manifesto to examine options to ensure that new-build schools and hospitals meet the highest energy efficiency standards. **We would urge the Executive to set an ambitious date by which all new schools will be zero carbon in use:** we would suggest 2009. We would also urge a major programme of retrofitting, with a target that by 2011 at least half of Scotland's nearly 2,800 schools would have received some form of intervention to reduce their carbon emissions.

As already indicated we understand that there is a particular problem with installing microgeneration technology into Scottish schools built under PFI/PPP. This needs to be resolved as soon as part of this programme, given the opportunities that exist to upgrade these newer buildings.

We are particularly supportive of the Executive's Eco-schools scheme, and would urge wider roll-out of this scheme, with a target for all Scottish schools to register on the scheme by a certain date – at the latest by 2011.

3.2.13. Implement new building standards from May 2007 and investigate the impact of further increasing the energy standards.

We warmly welcome the commitment in the SNP manifesto to aim for Scandinavian standards of energy efficiency in our buildings. To put this aim in context, the most recent change in Scottish regulations, introduced on 1 May 2007, require backstop U-values in domestic buildings of 0.3, 0.25 and 0.2 W/m²K in walls, floors and roofs respectively^{xi}. This is still not up to the standard set in Sweden in 1978, where the backstop values were 0.3, 0.2 and 0.2 W/m²K respectively^{xii}. It would appear we are nearly 30 years behind the best in Europe.

To make up this gap in the space of this parliament is ambitious, but we will entirely support any Executive that attempts it.

We also warmly welcome the commitment in the SNP manifesto to ensuring better enforcement of building standards, and to give clear political direction to the Scottish Building Standards Agency (SBSA). There is substantial evidence from some parts of the country that energy standards in building regulations in Scotland are not being complied with^{xiii}. As a first step, **an urgent and Scotland-wide study is required to establish the extent of non-compliance and give recommendations for improvement**. We would suggest that giving local authority building control departments ring-fenced access to the funds they raise would help to ensure better compliance, since this will allow adequate staffing and training levels. Many building standards managers are simply too overworked to address energy issues at present. Compulsory random airtightness testing would also, in our view, considerably help to improve compliance. It is also vital that consumer protection law is reviewed to allow building standards managers to prosecute the builders of any structure that does not comply with regulations. We understand that under current law, only the owner of the building can be prosecuted.

Since new build accounts for around one percent of the building stock each year, it is vital that energy performance in the existing stock is also raised. Around two and a half percent of the stock is renovated or extended each year, and we have long argued that building regulations should be used to ensure the energy performance of these buildings is upgraded, through a programme of consequential improvements. This would require a percentage of the extension/renovation budget to be invested in bringing the original building up to standard. This would complement the low-interest loans scheme proposed in 3.2.3 above.

Lastly, we note the SNP manifesto commitment to undertake an early review of the Executive's agency structure. We suggest that this review should examine whether the SBSA is effectively delivering Executive policies, in particular those on reducing greenhouse gas emissions, and whether some other structure might better deliver those policies.

3.2.14. Require energy performance certificates in buildings and use these specifically to enhance performance in the public sector.

We fully support this proposal, but note that under the terms of the EU Energy Performance of Buildings Directive, this should have been implemented in January 2006. We deeply regret the failure of the previous Executive to implement this directive on time, and hope the new Executive will accelerate full implementation. Specifically, **we suggest that certificates for all buildings, including rented buildings, are required from Spring 2008**. We have commented in greater detail on the consultation from the Scottish Building Standards Agency on implementation of articles 7, 8 and 9 of the Directive^{xiv}.

3.2.15. Consult on detailed proposals for permitted development rights for microgeneration.

The current system of planning permission for microgeneration is clearly an obstacle to householders. We understand that the review of the GPDO has recommended giving microgeneration technologies 'permitted development' status, within certain criteria, and we fully support this. **We would now urge the Scottish Executive to begin the necessary public consultation on this issue without delay**, in order that it can be resolved as quickly as possible – we would suggest a target date for introduction of the new order no later than the end of 2007. A similar consultation is already under way in England with the expectation that microgeneration will be given 'permitted development' status in October 2007. It is vital that Scotland aims to keep as close to this timetable as possible. To have different planning requirements in England and Scotland should be avoided if at all possible since this will result in unnecessary confusion for consumers and the industry.

3.2.16. Remove barriers to microgeneration giving eligibility for ROCs from April 2007 and continue to support uptake of microgeneration for householders and communities.

We fully support measures to increase the financial incentives for householders to install micro-renewables. Whether easier access to ROCs is the best method of achieving this, or whether it would be better achieved through feed-in tariffs is open to debate. Certainly, evidence from the continent, in particular Germany and Spain, suggests that generous feed-in tariffs have seen a substantial increase in uptake for some microgeneration technologies. Although it may not prove practical to proceed down the feed-in tariff route, since power over this matter is reserved, we strongly suggest that the feed-in method is thoroughly investigated.

In our experience, and from the feedback we have received from supporters and members of the public, it is extremely difficult and rarely financially beneficial for householders to claim ROCs. We are aware of some schemes that will sell ROCs at auction on behalf of a householder, but often the fees are greater than the value of the ROCs themselves. Support for householder forming 'householder energy co-operatives' or similar groups in order to facilitate the sale of ROCs should be considered.

3.2.17. Set microgeneration targets in 2007.

We strongly support the setting of targets at the earliest opportunity. Having seen how the setting of recycling targets (supported by substantial funding) galvanised action at a national and local level to improve levels of recycling in a relatively short period of time, we believe that targets are crucial in increasing the uptake by all sectors. However, rather than setting a target specifically for microgeneration, we suggest that a target for zero carbon buildings be set, as this links and stimulates action on both energy efficiency and microgeneration and would give a more holistic framework within which to work. We recognise that this is a fairly complex policy area within which to set targets and suggest two 'top-line' targets, which would incorporate both new build and existing building stock. Together with the energy efficiency targets outlined above, we believe that our suggested targets (in bold below) would ensure that the built environment plays its full part in achieving the carbon dioxide emissions cuts that are necessary to avert serious climate change.

The SNP manifesto contains a pledge to: "support the long term deployment of energy generation or energy saving in one million Scottish homes". We recognise this as a very worthwhile aspiration, and we trust this will be rapidly elaborated through an action plan setting out how and when the target will be achieved.

The Government in Westminster has set a target for England and Wales that **all new homes will be zero carbon by 2016^{xv}. We would strongly urge the Scottish Executive to adopt this target date at the latest for new homes.** In addition to this, FoES suggest that the adoption of a target that includes existing stock is necessary, otherwise there will be a growing disparity between new homes and existing homes which would disadvantage those in poorer housing stock.

We suggest setting a target of at least 40,000 homes per year (of new and existing stock) having zero or very low space heating requirement, from 2011 at the latest. In order to help achieve this, the section on micro-renewables in SPP6 Renewable Energy should be amended to require *all* new developments to reduce a percentage of predicted CO₂ emissions rather than just those over 500sqm. The percentage of CO₂ offset should be increased to 20 percent in 2008 and an 'escalator' devised with this percentage increasing yearly to 100 percent CO₂ offset in 2016 at latest, so matching the zero carbon homes target mentioned above. This policy should also be further extended to house renovations and 'change of use', to ensure that the policy maximises the carbon reduction potential of existing stock.

3.3. The draft Strategy states that we will consider targets to be included in the final strategy and action plan:

3.3.1. Do you have any views on specific targets referred to within the draft?

As set out above, we suggest the Executive sets the following targets:

- New buildings to be very low or zero-carbon in use by 2016 at the latest.
- Emissions reductions from the Executive's own estate of at least 5 percent per annum.
- At least 40,000 homes per year to be built or renovated to require very low or zero space heating demand by 2011 at the latest.
- A minimum NHER for the Scottish housing stock of 7 and a target mean NHER of 8.5 by 2016 at the latest.
- Carbon emissions from the built environment should be reduced by a minimum of 3 percent per annum.

3.3.2. Are there any other targets which you believe should be considered?

See 3.3.1 above

4. Are there any other comments you would like to offer on this strategy in relation to the promotion of energy efficiency and microgeneration in Scotland?

We would draw the Scottish Executive's attention to the work of the World Alliance on Decentralised Energy and research they conducted for Greenpeace into the benefits of a decentralised system of generation in Scotland. This demonstrated considerable efficiency savings compared with the maintenance of existing centralised system of generation.

Friends of the Earth Scotland involved members attending our AGM on 2 June 2007 in discussions on priorities for energy efficiency. This workshop session, involving around 35 individuals, highlighted a number of innovative suggestions and concerns, which we have reflected in this response. This consultation identified two further issues which have not been addressed above: the scope for targeting investment in economic development and regeneration into the creation of community-based energy businesses, especially to roll-out efficiency improvements; and the desirability of a progressive tariff structure for energy pricing. Of course the latter is primarily a matter for the regulatory framework set through reserved powers, but we would encourage the Executive to use its influence to promote such a structure, rather than the current perverse price incentives that reward higher users with lower prices.

5. If you are responding on behalf of an organisation, how do you think your organisation can contribute to the success of the strategy?

Our organisations have previously contributed to Executive work in this area through our membership of the Executive's Fuel Poverty Forum and through consultation on bodies such as the Forum for Renewable Energy Scotland. We would be delighted to continue our involvement in these or other Executive working groups in the future.

6. Conclusion

We believe that the Scottish Executive must go considerably further in terms of the promotion of energy efficiency than at present - both in terms of the targets it sets and also in the resources made available for their realisation. What we are suggesting is the minimum action that is necessary to deliver the required CO₂ reductions and tackle the scandal of fuel poverty, reversing a legacy of piecemeal and inadequate policy. Whilst initially costly, the eventual economic returns from energy efficiency would be positive and sustained, as would the health and social benefits. Conversely, given climate change, the threat of rising fuel prices,

Scotland's inevitable health statistics and an ageing population, maintaining the status quo should not be considered on economic, social or environmental grounds.

We trust that you are able to take these comments into account.

For further information please contact:

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ⁱ Performance and Innovation Unit (2002) *The Energy Review. A Performance and Innovation Unit Report*

ⁱⁱ Scottish Executive (2002) *Building a Better Scotland Spending Proposals 2003-6: What the money buys*
<http://www.scotland.gov.uk/Publications/2002/09/15421/10949>

ⁱⁱⁱ Energy Action Scotland (2007) *Living with a Warm Home and a Carbon Footprint - Recommendations for ending Fuel Poverty in Scotland*
<http://www.eas.org.uk/downloads/Manifesto%20Pages-0307.pdf>

^{iv} http://www.changeworks.org.uk/downloads/projects/Tenement_Carbon_Reduction.pdf

^v Energy Saving Trust (2005) *Changing Climate, changing behaviour – delivering household energy saving through fiscal incentives*

^{vi} For more details see http://www.bundesregierung.de/Content/DE/Artikel/_Reformprojekte/Energie-Energie-und-Rohstoffeffizienz.html or
http://www.kfw-foerderbank.de/DE/Home/Bauen_Wohnen_Energiesparen/Darlehensprogramme_fuer_Wohnimmobilien/Co2-Gebaeudesanierungsprogramm_neu/index.jsp (both in German)

^{vii} see <http://www.scotland.gov.uk/News/Releases/2006/05/16100131>

^{viii} Ofgem (2005) *A review of the Energy Efficiency Commitment 2002 – 2005*

<http://www.ofgem.gov.uk/Sustainability/Environment/EnergyEff/Documents/111254-18105.pdf>

^{ix} Hall Aitken (2007) *Evaluation of Loan Action Scotland* <http://www.scotland.gov.uk/Resource/Doc/173994/0048525.pdf>

^x Scottish National Party (2007) *Manifesto*, p. 29

^{xi} Scottish Building Standards Agency (2007) *Domestic Technical Handbook*

^{xii} Energy Advisory Associates (2001) *Building in ignorance, demolishing complacency: improving the performance of 21st century homes*
<http://www.ukace.org/pubs/reportfo/BuildIgn.pdf>

^{xiii} For example: Building Research Establishment (2004) *Assessment of energy efficiency impact of Building Regulations compliance*

Building Research Establishment (2004) *Thermal performance of new housing in the Aberdeen area*

Future Energy Solutions (2006) *Compliance with Part L1 of the 2002 Building Regulations*

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^{xiv} See http://www.foe-scotland.org.uk/nation/Energy_EPBD_implementation.pdf

^{xv} Towards a zero carbon future, Communities and Local Government News Release, 13 December 2006.

<http://www.communities.gov.uk/index.asp?id=1002882&PressNoticeID=2320>