
Energy Efficient Scotland Consultation: Making our homes and buildings warmer, greener and more efficient



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Ministerial Foreword



This government wants all our homes and buildings to be warmer, greener and more efficient and for people to reap the economic and health benefits that will bring.

Every year, households, businesses and public services in Scotland spend around £2.5 billion on heating and cooling their properties, yet, many of our buildings are inefficient and for many people, energy remains unaffordable. Energy Efficient Scotland brings together all of the Scottish Government's work to improve the energy efficiency of our buildings under one long-term programme to transform Scotland's buildings by 2040 in support of Scotland's Climate Change Plan and our Energy Strategy¹.

The latest figures tell us that 649,000 Scottish households were in fuel poverty in 2016. We know that living in draughty, inefficient housing, or having unaffordably high fuel bills, can impact on health, wellbeing and quality of life. To achieve our ambition of a greener, fairer Scotland where people can flourish and prosper, and tackle fuel poverty for those households, we therefore are committing to a long-term programme of investment and improvement in energy efficiency.

Globally, we are faced with the challenge of mitigating climate change. Our latest statistics show that buildings account for 19.7% of total greenhouse gas emissions. So, improving the energy efficiency of our homes and businesses will reduce energy demand and alongside efforts to promote the use of low carbon and renewable heat can help us to achieve Scotland's ambitious climate change targets.

¹ Please find Scotland's Climate Change Plan here: <http://www.gov.scot/Publications/2018/02/8867> and the Energy Strategy here: <http://www.gov.scot/Topics/Business-Industry/Energy/energystrategy>.

Given the scale of our ambition to eradicate fuel poverty, mitigate climate change, and grow the Scottish economy in an inclusive way, energy efficiency was designated as a National Infrastructure Priority by Scottish Ministers. We did this because it has many benefits – benefits for people, businesses and society as a whole. It puts money in people's pockets, delivers savings to the public sector to reinvest in frontline services, and improves the competitiveness of our businesses. Investing in energy efficiency will also boost economic growth, with research showing a 10% improvement in the energy efficiency of all UK households will sustain GDP expansion of around 0.16%.

Investing to bring Scotland's buildings up to standard will help to support jobs across the Scottish economy. We know that for every £100 million spent on energy efficiency improvement approximately 1,200 full-time jobs are supported. Over the lifetime of the Programme we estimate that total investment, whether from public or private sources, will be in the region of £10-12 billion. The Scottish Government is already on track to meet our Programme for Government commitment to make more than £500 million available to support the Programme over the four years to 2020-21.

From the outset, we have sought to work with our delivery partners, stakeholders and other experts to design the Programme. This consultation and the associated Route Map have been informed by extensive consultation and discussions over the past two years. One of the key things we heard was that it is important to set out the end goal and key milestones upfront to provide certainty for property owners and investors.

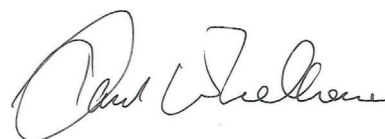
This consultation outlines our proposals for a long-term standard for Scotland's homes and the proposed phasing of standards in privately rented and owner occupied homes. It seeks your views on our future approach to setting long-term improvement targets for non-domestic buildings, which will help inform research later in 2018 and a more detailed consultation during 2019. We also ask what legislation may be needed to support the Programme more widely.

It is important that we continue this discussion so that we can create a long term, credible and robust programme that is capable of helping people across Scotland to improve the energy efficiency of their properties and, in doing so, tackle fuel poverty, mitigate climate change and help grow the Scottish economy.

We encourage you to respond to this consultation and look forward to hearing your views.



KEVIN STEWART MSP
Minister for Housing and Local Government



PAUL WHEELHOUSE MSP
Minister for Business, Innovation and Energy

INTRODUCTION

1. Scottish Ministers announced in June 2015 that they would take long-term action to reduce building energy demand and decarbonise the heat supply, designating energy efficiency as a National Infrastructure Priority. Energy Efficient Scotland is the culmination of this thinking. This Programme will improve energy efficiency and promote low carbon heating in Scotland's homes and buildings. By making improvements to our homes, business premises and public buildings, we can use less energy. This can help to tackle fuel poverty, help businesses to be more competitive and release savings in the public sector for front line services.
2. This consultation asks for views on proposals, access to EPC data, and on legislation to help improve the energy efficiency of privately rented and owned homes as well as non-domestic buildings in Scotland. It should be read in conjunction with the Route Map for Energy Efficient Scotland which sets out our long-term ambitions to improve the energy efficiency of Scotland's building stock and the actions we will take to achieve them.
3. Once fully operational, Energy Efficient Scotland will be a whole system approach to delivering energy efficiency improvements and the provision of low carbon heat. A framework of energy efficiency standards, advice and funding will help create long-term consistency and confidence for consumers and industry, backed up by legislation where needed. Energy Efficient Scotland will help support skills and supply chains across Scotland with appropriate protections for consumers. The Programme can also deliver significant health and wellbeing benefits, particularly for those living in cold and damp homes.
4. As set out in our recent consultation on a new fuel poverty target for Scotland, we are committed to removing poor energy efficiency as a driver of fuel poverty. The Programme will be the primary mechanism by which this is achieved.
5. Energy Efficient Scotland also supports our ambitions to reduce total greenhouse gas emissions by at least 80% on 1990 levels by 2050. The Climate Change Plan, published in February 2018, following extensive modelling and parliamentary scrutiny, outlines the steps we will take to reduce emissions from Scotland's buildings by 23% and 59% for domestic and non-domestic buildings by 2032 respectively, on 2015 levels. Achieving this will mean that by the middle of this century all buildings in Scotland will need to be near zero carbon where feasible.

**Our Vision –
By 2040, our homes and buildings are
warmer, greener and more efficient.**

Energy Efficient Scotland's role in reducing energy demand and decarbonisation

6. In the initial phases of the Programme to 2025, we will focus on improving the energy performance of the fabric of buildings and on deploying low carbon heat solutions where they are a low regret option; for example in off-gas areas and district heating (where appropriate and feasible such as in heat dense areas).² Longer term, we will review the Energy Efficient Scotland Programme to respond to the UK Government's decisions on the future of the gas grid which are expected in the mid-2020s (a reserved matter).³ We intend to integrate the UK's position for on-gas properties when it is available, to support meeting the 2032 Climate Change target.
7. This consultation is primarily focussed on our proposals to create a framework of energy efficiency standards. It builds on earlier consultations on energy efficiency and fuel poverty including, amongst others; the Consultation on Scotland's Energy Efficiency Programme, Energy Efficiency and Condition Standards in the Private Rented Sector and the Fuel Poverty Strategy Consultation.
8. This consultation is seeking views on setting a Long-Term Standard for domestic buildings; phasing of private rented and owner occupied sectors towards reaching the Long-Term Domestic Standard; our proposal for setting benchmark standards for non-domestic buildings; access to EPC data; and on what legislation may be needed more widely to support the Programme.
9. We are consulting separately on proposals for new milestones for the Energy Efficiency Standard for Social Housing (EESH), which can be found at: <https://beta.gov.scot/ISBN/9781788518185>.

Next Steps

10. Following the consultation we will analyse the responses received and set out the Scottish Government's response. The feedback will inform further development of the Energy Efficient Scotland Programme and future updates of the Route Map, which we will next issue in 2019. Feedback on our proposals for the non-domestic sector will inform a future consultation due in 2019.

² Low regret options are heating systems that should not be required to be replaced/upgraded before the end of their planned operational life.

³ <https://www.theccc.org.uk/wp-content/uploads/2016/10/Next-steps-for-UK-heat-policy-Committee-on-Climate-Change-October-2016.pdf>

IMPROVING OUR HOMES

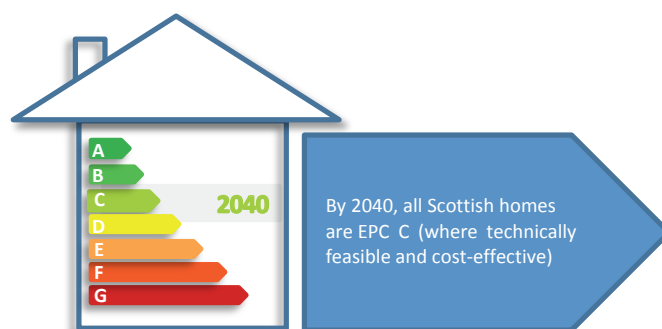
Introduction

11. When we consulted on Scotland's Energy Efficiency Programme (SEEP) last year, there was a clear consensus across all respondents that a Long-Term Domestic Standard is needed to provide certainty and a clear direction of travel. As set out in the Route Map, we are proposing setting a Long-Term Standard for the domestic sector to be met by 2040.

Sector Overview

12. There are currently around 2.5 million⁴ households in Scotland of which approximately 61% are owner occupied, 15% are privately rented, and 23% are socially rented. Social housing, where standards have been in place since 2014, is on average more energy efficient with over half rated EPC Energy Efficiency Rating Band C or better. This compares to the private rented and owner occupied sectors where under two-fifths of homes achieve a similar rating.
13. In 2016, 83% of homes were considered to be covered by the gas grid (within 63 metres of the grid). It is estimated that 79% of homes use gas as their main heating fuel, 11% use electricity, 6% oil and the remainder use other fuels.

Long-Term Domestic Standard



We propose that all homes must reach at least an EPC Energy Efficiency Rating Band C (hereafter referred to as EPC C) by 2040, where technically feasible and cost-effective.

14. In 2016, 39% of homes were at EPC C or better.⁵ The capital investment required to meet the Energy Efficient Scotland Programme is based on improving buildings where it is technically feasible and cost-effective. We have acknowledged that it will not be possible to bring 100% of properties to the standards set out. We estimate that the costs of meeting the Programme for domestic properties is in the region of £8bn, to bring around 75% of Scotland's private sector to EPC C and around 50% of its social rented sector properties to EPC B. While costs to achieve the standards will vary across dwellings depending on their built form, fuel type, and current levels of heating system efficiency and insulation, we estimate that the median cost in the private sector (i.e. for owner occupied and privately rented dwellings) will be in the region of £3,500, which means that half of dwellings can be upgraded at a cost of £3,500 or less.

⁴ NRS Estimates of Households and Dwellings, 2016, estimates that there are 2.45 million households or 2.58 million dwellings.

⁵ Source: SHCS based on SAP 2012.

15. These statistics have been modelled using the National Household Model, which is also used by the UK Government and the Committee on Climate Change, drawing on data from the Scottish House Condition Survey. The model allows dwellings to be upgraded using a set of standard measures, relating to improving the efficiency of heating systems, insulating walls, roofs and floors, and installing renewables (solar, heat pumps and biomass boilers). This list is not exhaustive. For each dwelling, the model selected the package of measures which would bring the dwelling up to the target EPC at the lowest capital cost.
16. This will help to achieve our climate change commitments, by reducing our domestic energy demand and emissions. The Fuel Poverty Strategic Working Group has also recommended that Energy Efficient Scotland include a milestone towards achieving our goal of removing poor energy efficiency as a driver for fuel poverty. This is discussed further in paras 42-45.

Consultation Questions

1. What are your views on our proposal for owner occupied and private rented properties to achieve the Long-Term Domestic Standard EPC Energy Efficiency Rating Band C by 2040 at the latest?

Exceptions to the proposed Programme Long-Term Domestic Standard (private rented and owner occupied homes)

17. We think there could be situations where it is appropriate for a lower standard to be acceptable, or for owners to have longer to improve their property, for example where there are issues to do with permissions or agreement of other owners. This is the approach currently taken in the Energy Standards for Social Housing (ESSH), and consulted on for the private rented sector.

Consultation Question

2. Do you think we should allow for situations where a lower standard is acceptable?
3. Do you think we should allow for situations where a longer period for improvement is allowed? Please explain your answer, giving examples.

Technically feasible and cost-effective

18. We are proposing that properties would only need to be brought up to the standard where it is technically feasible and cost-effective. Technical feasibility is best determined at an individual property level. We consider that a new assessment, building on the EPC process, should be developed which will identify what is technically feasible.
19. As well as being technically feasible, measures should also be cost-effective. We consider this to mean that it should pay for itself over its lifetime. The new assessment proposed needs to include information on the 'cost-effectiveness' of measures to assist owners in understanding what combinations of appropriate measures are likely to be achievable within a given budget or payback period and how long the benefit from installed measures will continue. Please see the assessment section for more information.

Consultation Question

4. We are proposing that the definition of a cost-effective measure is that it should pay back over its lifetime. What are your views on this definition?

Air Quality and the Long-Term Domestic Standard

20. Indoor air quality is a key health issue affecting people, homes and energy efficiency. While improvements in energy efficiency can lead to improvements in health outcomes, particularly for older people, young children, and those with respiratory and other chronic health conditions, there is the potential for unintended consequences adversely affecting the air quality in a home. Proper use of energy and ventilation systems will help ensure air exchange rates meet recommended levels. Advice for households, which includes effective engagement with tenants in rented properties, is vital for successful outcomes in these regards.

21. The Energy Efficiency Standard for Social Housing (EESH) consultation, which is live in parallel with this consultation, proposes that the Scottish Government and social landlords work together at the earliest opportunity to collect and analyse data on air quality, with a no detriment air quality requirement to be included in EESH from 2025.

Consultation Question

5. What are your views on the issue of air quality in relation to the Long-Term Domestic Standard?

Using EPCs for the Long-Term Domestic Standard

22. Energy Performance Certificates (EPC) are an established mechanism to benchmark a property's energy efficiency. They are required at the point of sale and rental. The Energy Efficiency Rating on the EPC is already used in social housing to set minimum standards through the Energy Efficiency Standard for Social Housing (EESH), which currently complies with minimum energy efficiency standards using this metric (Reduced Standard Assessment Procedure [RdSAP] Rating).⁶ The EPC Energy Efficiency Rating will also be used when regulating for minimum energy efficiency standards in the private rented sector.

Energy Performance Certificates (EPCs)

The EPC reports upon the calculated Efficiency of the dwelling using the 'Reduced Data' version of the UK Government Standard Assessment Procedure for Energy Rating of Dwellings (RdSAP).

Two ratings are reported on the EPC:

1) The Energy Efficiency Rating, which takes into account both energy efficiency and fuel costs. The higher this rating, the lower fuel bills are likely to be.

2) The Environmental Impact (CO₂) Rating, which reports the dwelling's effect on the environment through its emissions. The higher the rating, the more environmentally friendly the property is deemed to be.

Both ratings are divided into seven bands ranging from A to G, with band A being the best, with a calculated rating of 92 or higher. The EPC reports both the current ratings for the building and potential ratings for the building if identified improvement measures are undertaken.

⁶ RdSAP is used for pre-existing buildings, while SAP is used for new builds. There is a necessity for this split in how buildings are assessed as existing buildings cannot feasibly meet some of the energy efficiency criteria which are now in effect for new builds.

23. Stakeholders responding to the 2017 SEEP Consultation told us that, whilst EPCs are not always fully understood, they are already used widely and recognisable, and recommended that we build on them. As such, we will continue to use EPCs and the Energy Efficiency Rating to set performance standards for domestic buildings.
24. Feedback received during the 2017 SEEP Consultation highlighted a number of concerns around the underlying methodology of EPCs and we have already commissioned some initial research to explore these issues and identify how EPCs can be improved to support Energy Efficient Scotland.
25. The Energy Efficiency Rating is linked to the energy efficiency of the property, the type of heating system in place, and the cost of fuel. As such, it can change over time as the background methodology is refined and updated to take account of the latest knowledge and by revision in fuel price data used in the calculation.
26. The existing Energy Efficiency Standard for Social Housing (EESSH) takes account of this through conversion tables, base lined against the version of SAP used to set the standard, and recognising that social landlords need to be able to plan works across their stock over the longer term as part of their asset management processes. In comparison, our consultation in 2017 on minimum standards in the private rented sector proposed that compliance with the standard would be based on the rating on the current valid EPC for the property, to ensure that the standard was based on the most current assessment of the property. We are now seeking views on how best to take account of potential future changes to EPC ratings driven by changing methodology and fuel price data.

Consultation Question

6. The EPC Rating of a property can be affected by changes to the underlying methodology and to fuel price data. How do you suggest that the Programme takes account of this in setting the Long-Term Domestic Standard?

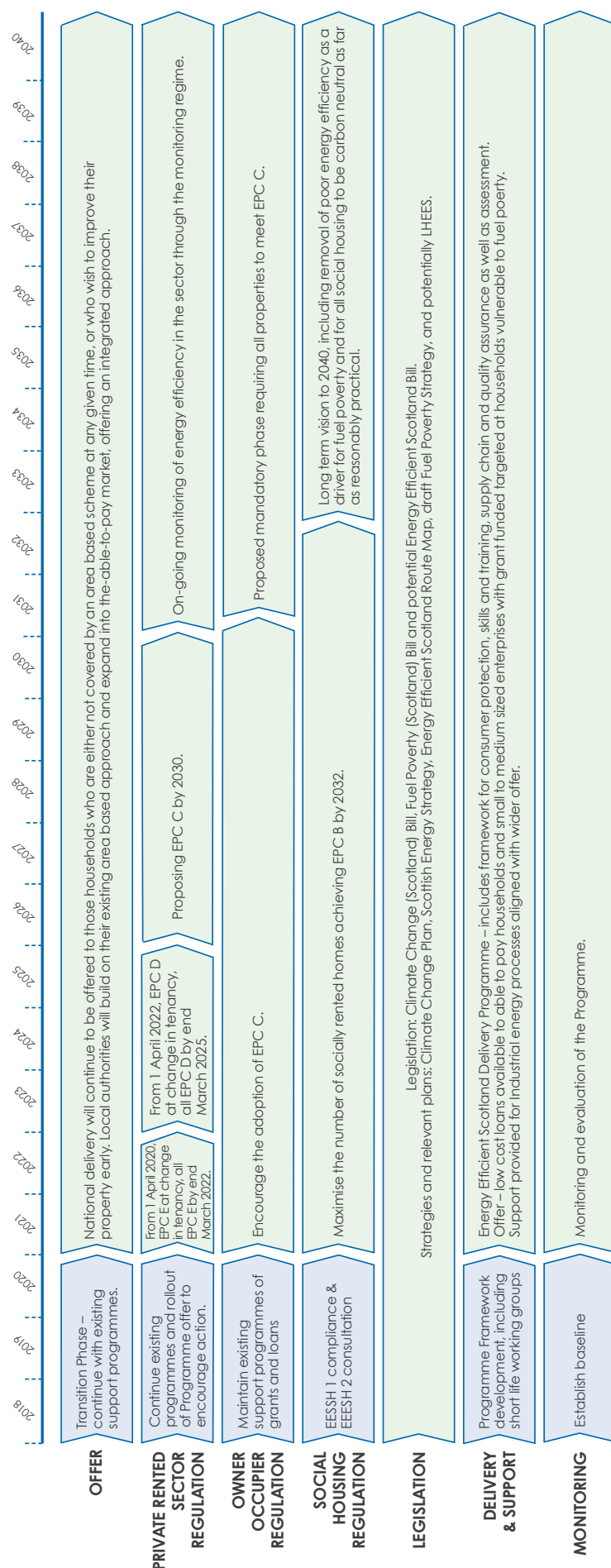
Support for the Long-Term Domestic Standard

27. We know that there are different starting points for energy efficiency across the social and privately rented and owner occupied sectors. In the past, Government schemes and standards have focussed on improving the energy efficiency of households in fuel poverty. In the social rented sector landlords have already been working towards ensuring that the majority of their properties are equivalent of EPC C or D by 2020. Grant schemes and low-cost loans have been made available to help improve the energy efficiency of owner occupied and privately rented properties. However much more remains to be done to improve these sectors. Due to these differences in starting points we consider that the EPC C standard should be introduced in a phased way. The following table and diagram below summarise the proposed domestic programme for Energy Efficient Scotland by sector and essential delivery criteria.

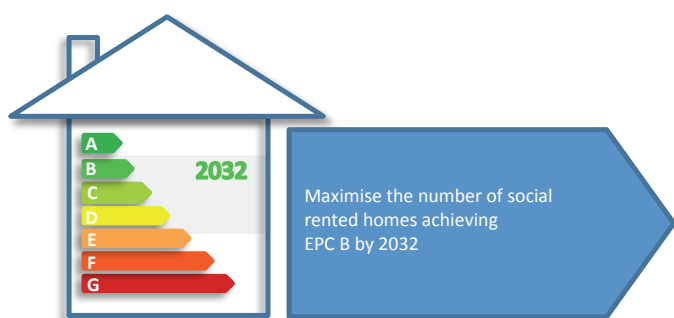
DOMESTIC

	• Transition	• General	• Advice	• Delivery		• Finance	• Service
OFFER	<p>In the Transition Phase we will expand current local delivery programmes into able-to-pay households and businesses, drawing on national advice and financial support.</p> <p>The two year programme will incrementally offer local authorities greater opportunities to plan and deliver integrated energy efficiency projects.</p>	<p>The Programme offer will consist of a universal end-to-end offer made by either a local authority or the Scottish Government.</p>	<p>The foundation of the Programme offer is that all households will be able to access good quality, independent advice and information on improving the energy efficiency of their property and reducing their fuel bills.</p>	<p>Tackling fuel poverty – Area based schemes and Warmer Homes Scotland.</p> <p>National delivery - continue to be offered to provide those households who are either not covered by an area based scheme at any given time, or who wish to improve their property earlier than any proposed backstop date.</p>	<p>Local delivery - Local authorities expand their current approach to delivery by developing a Local Heat and Energy Efficiency Strategy (LHEES) setting out a costed delivery plan for its area.</p>	<p>A mixture of grant and loan funding across different tenure and sectors to tackle fuel poverty and enable achievement of standards.</p> <p>Independent advice will be the bedrock, advising property owners on the standards they will be expected to achieve, deadlines, trigger points, programmes and funding.</p>	<p>The Programme customers should be offered a consistent, quality level of service at each stage of the process.</p>

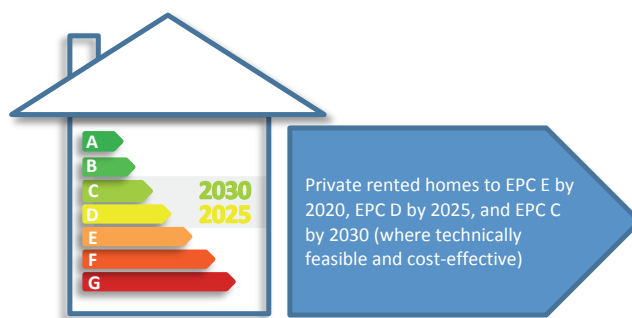
DOMESTIC PROGRAMME SUMMARY



Social Housing



Private Rented Sector (PRS)

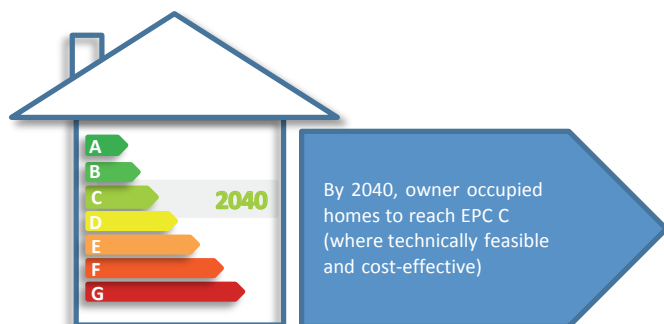


28. The Energy Efficiency Standard for Social Housing (EESH) was introduced in 2014 and aims to encourage landlords to improve the energy efficiency of social housing in Scotland. The EESH sets a minimum EPC Energy Efficiency Rating for landlords to achieve by 2020 (equivalent to EPC C or D dependent on building type and fuel type), and three quarters of the social housing stock already meets the standard. The Scottish Housing Regulator is responsible for monitoring social landlords' compliance with the EESH, and use this information as part of its annual risk assessment of social landlords.
29. Following a review of the EESH, and consideration of activity post-2020, a new milestone has been proposed to maximise the number of social rented homes attaining EPC B by 2032, with an opportunity for review in 2025. We are consulting separately on these proposals, which can be found at: <https://beta.gov.scot/ISBN/9781788518185>.
30. We consulted on proposals for minimum energy efficiency standards in private rented housing in summer 2017 and published an analysis of responses in November 2017.⁷ As set out in the Route Map, we will bring forward regulations requiring PRS properties to have at least an EPC E at a change of tenancy from 1 April 2020 and in all properties by 31 March 2022; and to have an EPC D at a change of tenancy from 1 April 2022 and in all properties by 31 March 2025. There will be financial penalties for those who fail to achieve compliance. In some situations, there will be exceptions, for example where a lower level or longer timescales will be acceptable.
31. In order to provide certainty for landlords to plan improvements and make use of the support on offer, **we propose that PRS properties reach the Long-Term Domestic Standard of EPC C by 2030**. This will bring the private rented sector closer to the standards in the social rented sector so that people who rent in Scotland, whether privately or socially, can enjoy housing which is warmer and affordable to heat. This could be achieved in the same way as the minimum standard, applying at point of rental from April 2025 and in all PRS properties by 2030, with financial penalties for non-compliance.

⁷ For the consultation and analysis of responses, please see <https://consult.gov.scot/better-homes-division/energy-efficiency-programme/>

Consultation Question

7. What are your views on the proposal that all PRS properties meet EPC Energy Efficiency Rating Band C by 2030?

Owner Occupied

32. Private homes occupied by their owners account for 61% of housing. As such, improving the energy efficiency of these homes will be critical in achieving the overall aims of the Programme. The Scottish Government has provided support to improve the energy efficiency of owner occupied properties for a number of years, including through our Home Energy Efficiency Programmes for Scotland. This has helped drive a steady improvement in the number of homes achieving EPC C, and there are now around 34% of homes at this standard.
33. However, much more remains to be done to improve the energy efficiency of owner occupied homes. Based on current figures, there are around 1 million owner occupied properties in EPC energy efficiency bands D-G which would need to be improved to meet EPC C by 2040.

34. That is why we are proposing **that over an initial 10 year period we focus on encouraging and enabling home owners to improve their homes, and that we will consider whether mandatory action is needed from 2030 to require owner occupiers to improve their homes to EPC C by 2040 (where technically feasible and cost-effective). This will be linked to the ongoing review of the Energy Efficient Scotland Programme to monitor the effect of the voluntary phase.**

Encouraging Action

35. In the first years of the Energy Efficient Scotland Programme, we think that action in the owner occupied sector should continue to be based on enabling and encouraging action, through the Programme offer, which builds on our existing support schemes such as the Home Energy Efficiency Programmes for Scotland (HEEPS), and through information on energy efficiency being provided at key trigger points. This could also be an opportunity to provide advice on the benefits of energy efficiency, the support which is available, and the long-term ambition of the Programme.

Requiring action

36. Movement towards an EPC C will initially be progressed through encouraging and enabling owners to improve their properties. We will monitor progress through wider work to evaluate the roll out of Energy Efficient Scotland, but if this does not show satisfactory progress towards meeting our ambition, we think that mandatory action to ensure compliance with the Long-Term Domestic Standard will need to be considered. For example, this could be through requiring improvements to reach EPC C when there is a change in ownership, or ultimately requiring the standard in all properties. If we do mandate that owner occupiers improve their properties, this is likely to be accompanied by financial penalties for non-compliance. The detail of how standards would be required and enforced will be subject to further consultation ahead of their introduction.

37. We think that we should consider starting to require owners to improve their properties to EPC C from 2030. This would allow 10 years of the Energy Efficient Scotland Programme to encourage action, and 10 years to ensure the remaining properties are brought up to standard.

Consultation Questions

Owner Occupiers: Encouraging Action

8. What are your views on our proposal for an initial period of encouraging action?
9. What information would be useful for householders to be able to access on how to achieve EPC Energy Efficiency Rating Band C before 2030?

Owner Occupiers: Mandatory Action

10. What are your views on our proposal to follow this initial period with mandating action?
11. What are your views on our proposal that 2030 is the right point to start mandating action to achieve EPC Energy Efficiency Rating Band C?
12. What are your views on our proposal for owner occupied properties to be subject to penalties for non-compliance?

Homes outside of the existing mandatory EPC process

38. We are proposing linking the Long-Term Domestic Standard to the EPC because these are already required at the point of sale or rental in the majority of Scottish houses. However, Park Homes are not covered by the European Performance of Buildings Directive nor by housing legislation. Fuel poverty can be an issue for people not living in traditional domestic accommodation, for example

mobile homes⁸ or gypsy/traveller accommodation. It may therefore be appropriate to ensure that action is taken within the Energy Efficient Scotland Programme to improve the energy efficiency of such accommodation.

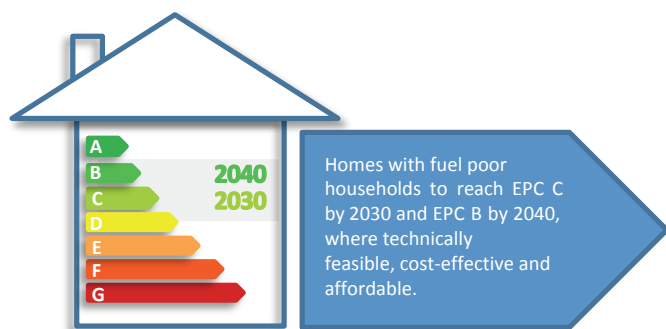
39. Our Warmer Homes Scotland programme is available to all eligible households in Scotland, including the gypsy traveller community. It can provide assistance for those living in Park Homes which are also eligible for assistance through our Area Based Schemes but must be part of the permanent housing stock and have an EPC Energy Efficiency Rating of E, F or G.
40. Similarly, agricultural homes such as agricultural tenancies and crofts, are also not currently required to meet other housing standards. Scottish Ministers are considering this issue, and it may be appropriate for the Energy Efficient Scotland Programme to consider the possible application of energy efficiency standards to these properties over time.
41. Finally, accommodation such as Houses in Multiple Occupation (HMOs) and holiday lets may not be required to have an EPC under existing legislation. Further work is planned to identify and then determine which types of domestic accommodation should be included within the Energy Efficient Scotland Programme.

Consultation Question

13. What are your views on requiring all types of accommodation to meet the Long-Term Domestic Standard over time? Please explain your answer, giving examples of accommodation you think should/should not be required to meet the Long-Term Domestic Standard if relevant.

⁸ Mobile homes, often known as Park Homes, are self-contained prefabricated buildings, transported to a licensed park home site where they are assembled. Once in place they are very rarely moved, but to comply with the law they must remain capable of being removed.

Higher targets for Fuel Poor Homes



42. Households that are living in fuel poverty spend a larger proportion of their income on fuel bills. We know that improving the Energy Efficiency Rating of Scotland's homes is one of the most sustainable ways to lift households out of fuel poverty by providing fuel bill savings year-after-year as well as helping to protect against future fluctuations in fuel prices. That is why we have allocated £1 billion to our fuel poverty and energy efficiency programmes since 2009, helping over 1 million households vulnerable to fuel poverty.
43. We recently consulted on establishing a non-statutory sub-target and interim milestone in our fuel poverty strategy to remove poor energy efficiency as a driver of fuel poverty by ensuring all homes reach a minimum energy performance rating by 2040.
44. As set out earlier in this consultation we are proposing setting a minimum energy efficiency standard of EPC C, to be met by all domestic properties, where technically feasible and cost-effective, by 2040. However, due to the depth of fuel poverty experienced by some households, we know that reaching EPC C will not be enough to lift them out of fuel poverty. We are proposing a new milestone to maximise the number of social rented homes attaining EPC B by 2032, and whilst some of our most vulnerable citizens live in social housing, we also want to ensure that all fuel poor households are

protected. That is why we also propose adopting a higher ambition or stretch target for fuel poor households, regardless of tenure, that would see them improved so that they reach EPC C by 2030 and EPC B by 2040.

45. We know that in many cases it will not be feasible to achieve EPC B without significant technical intervention, for example the installation of solar panels and heat pumps in addition to significantly improving the building fabric, or without significant investment. That is why, at this stage, we do not believe it is appropriate to propose making such ambitious targets mandatory across the entire domestic building stock. However, we propose that these ambitious targets act as a guide for our national and area-based fuel poverty programmes which will operate throughout the lifetime of Energy Efficient Scotland, building on the existing schemes in operation. In practice this will mean maximising the level of improvement possible, whilst remaining affordable for the public purse.

Consultation Question

14. Please provide your views on our proposal that all homes with fuel poor households are to reach EPC Energy Efficiency Rating Band C by 2030, where technically feasible and cost effective?
15. Please provide your views on our proposal that all homes with fuel poor households are to reach EPC Energy Efficiency Rating Band B by 2040, where technically feasible, cost-effective and possible within limits affordable to the public purse?

THE ROLE OF ASSESSMENT TO SUPPORT THE DOMESTIC ENERGY EFFICIENCY STANDARDS

46. As noted in paras 18 and 19, any assessment process needs to be robust enough to be able to consider the technical feasibility and cost-effectiveness of improvements to a property to reach EPC C and therefore is likely to include an advisory element too.
47. For some owner occupiers or landlords from the private rented sector, the process from assessment through to improvement, to meeting the Long-Term Domestic Standard will be straightforward and the current EPC assessment should be able to be used. However, there will be situations where the owner of the property may be unsure of what measures to install, or want to know what to do to achieve a higher standard. There are also technical issues around buildings that could mean that some additional assessment will be needed.
48. We recognise concerns flagged in response to previous energy efficiency consultations on the use of the EPC methodology to set improvement targets under the Energy Efficient Scotland Programme. As a first step, we have commissioned research to identify where a response to such concerns is needed.
49. As noted, in some situations, an additional assessment may be needed. This additional assessment should be appropriate and proportionate and will build on the existing EPC assessment process. By using and developing the existing EPC assessment we will maintain and grow the existing capacity, experience and skills we have within the Scottish supply chain. To develop this, beyond the current EPC process, we will be undertaking further exploratory work with stakeholders.
50. We are proposing to set up a Short Life Working Group (SLWG) which will take into consideration our commissioned research and move forward with the development of the additional assessment requirements as well as formulating how this Energy Efficient Scotland assessment will be delivered. The Energy Efficient Scotland Assessment SLWG will be convened in the early summer, and will also take into account the responses to this consultation.

Consultation Question

16. In addition to what we have set out in paras 46-50, what should the Energy Efficient Scotland Assessment Short Life Working Group also consider? Please explain your answer.

COMPLIANCE AND ENFORCEMENT OF THE LONG-TERM DOMESTIC STANDARD

51. We propose that the Long-Term Domestic Standard is mandatory over time and so there will need to be processes in place to monitor and enforce the standard across the sectors. With the proposal that the standard be set with reference to the EPC rating, there is the opportunity to make use of existing EPC processes (and those developed to support the Energy Efficient Scotland assessment) to prove compliance and monitor improvements to properties over time.
52. The SHR is responsible for monitoring social landlords' compliance with the EESSH, and use this information as part of its annual risk assessment of social landlords. The consultation in summer 2017 proposed that local authorities may be the appropriate body for enforcing the minimum standards in the private rented sector, given their existing role in this sector, though it was noted that there would be resource implications to this. Future consultation on the detail of how mandatory action would work in the owner occupied sector would include proposals on where responsibility for enforcement would sit.

Consultation Question

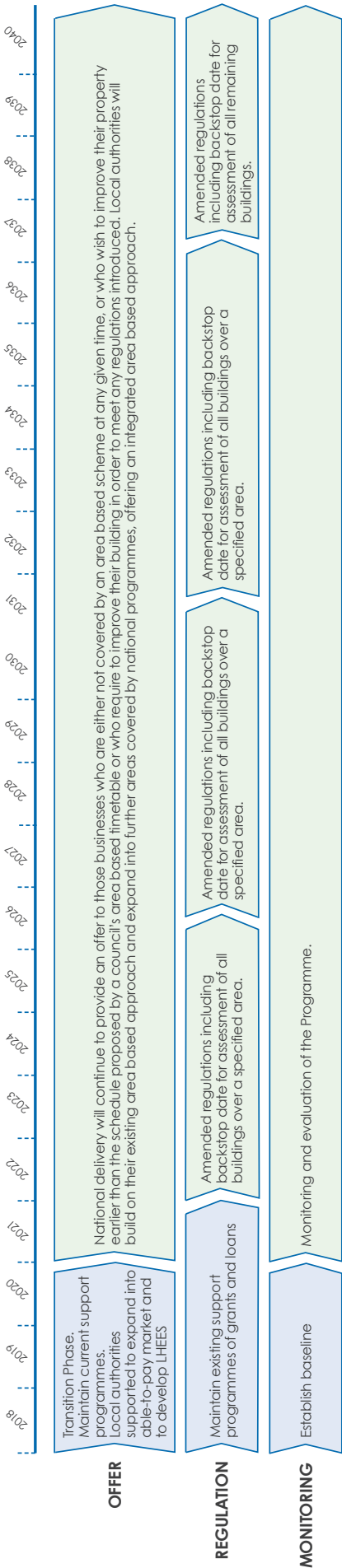
17. What are your views on whether the Long-Term Domestic Standard should be enforced at a local or national level? Please explain your answer.

SUMMARY

NON-DOMESTIC

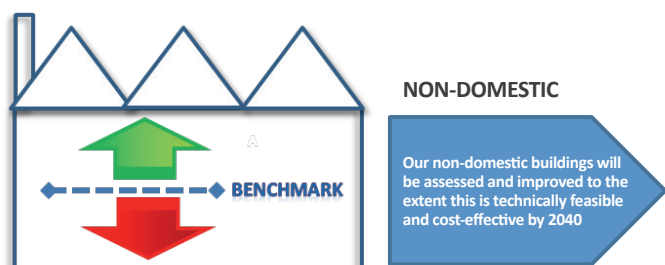
	• Transition	• General	• Advice	• Delivery		• Finance	• Service
OFFER	In the Transition Phase we will expand current local delivery programmes into able-to-pay households and businesses, drawing on national advice and financial support.		The foundation of the Programme offer is that all businesses will be able to access good quality, independent advice and information on improving the energy efficiency of their building(s) and reducing their fuel bills.	National Delivery - continue to be offered to those businesses who are either not covered by an area based scheme at any given time, or who wish to improve their property earlier than backstop date.	Local authorities expand their current approach to delivery by developing a Local Heat and Energy Efficiency Strategy (LHEES) setting out a costed delivery plan for its area.	Subsidise cost of interest free loans for SME sector. As non-domestic baseline developed there is potential to consider a more targeted approach to certain businesses (in terms of size or sector). Large businesses and public sector have ready access to finance resources.	
REGULATION	The scenario proposes the use of building floor area to bring a roughly equal proportion of buildings under regulation within a five yearly review of regulations.	The Assessment of Energy Performance of Non-domestic Buildings (Scotland) Regulations 2016 introduced a requirement for owners of larger non-domestic buildings (>1,000 m ²) to assess and improve the emissions and energy performance of their buildings. The requirement is triggered by sale or rental.	The output of an assessment is an 'Action Plan' that records both the improvement targets and the measures that will be undertaken to meet them, based upon advice from a registered Advisor.				Energy and emissions improvement targets will be set at a level that will pay back investment over an appropriate timescale. This will reinforce the message that 'simple improvements make sound business sense'.

NON DOMESTIC PROGRAMME OVERVIEW



NON-DOMESTIC SECTOR OVERVIEW

53. There are approximately 200,000 non-domestic buildings in Scotland, including around 20,000 buildings in public ownership. The non-domestic building stock is hugely diverse in terms of construction, size and, in particular, building use ranging from shops and offices to factories, warehouses and hotels.
54. We know less about the energy performance of the non-domestic sector compared to the domestic sector. However, of the 30,000 non-domestic buildings that have an EPC assessment, we know that 5% have a rating of EPC B or better, 22% are rated C or D, and the remaining 73% rated E or worse.⁹ We are currently developing our understanding of the energy efficiency performance of Scotland's non-domestic building stock, which will be used to inform the development of the Programme.



Regulation for improvement

55. An initial platform for the assessment and improvement of non-domestic buildings was established to support regulations introduced on 1 September 2016.¹⁰

56. Information on current and planned work to review these regulations and on proposed phasing of future regulations is set out within Chapter 3 of the Route Map document¹¹ which summarises:
- Our intended approach to review and phasing of regulations;
 - Developing improvement targets for 2020, including a public consultation on detailed proposals in 2019;
 - Investigation into setting a Long-Term Standard; and
 - Work plan to 2021.

Our intended approach to review and phasing of regulations

57. We intend to build on the current regulations with a phased expansion over twenty years so that all buildings are covered by the regulations by 2040. We also propose that the current triggers be reviewed to provide a level of assessment and improvement activity that can be spread out over the period of the Energy Efficient Scotland Programme.
58. To further drive change at a sustainable rate, we will also consider the need to introduce 'back stop' dates as milestones within the Energy Efficient Scotland Programme. These will define the date when buildings subject to regulation must have obtained an assessment if one has not already been required by a trigger transaction (currently sale or rental).

⁹ Scottish EPC Register (based on EPCs lodged 29 January 2013 to 31 July 2017)

¹⁰ The Assessment of Energy Performance of Non-domestic Buildings (Scotland) Regulations 2016 – see www.gov.scot/section63.

¹¹ Route Map link: <https://beta.gov.scot/ISBN/9781788518161>

59. Current estimates place the total cost of improving the energy efficiency of our non-domestic buildings in line with the Climate Change Plan ambitions at £2-4 billion. It is not possible at this stage to determine the cost of improvement at an individual property level. Options for this, including reasonable payback periods, will be established as part of research to develop 2020 targets.

Developing improvement targets for 2020

60. Setting one standard that would apply to all buildings may not offer the most practical and equitable approach to improvement because of the wide variety of building types and purposes in the non-domestic sector. We are proposing moving towards a benchmarking system where the performance of a building is assessed against a 'notional building' specification to identify 'what good looks like' for that building. We will investigate the extent to which this specification may have to vary, in response to important building characteristics (such as type and construction).
61. Part of planned Programme work will also be to consider more direct means of presenting and benchmarking the calculated energy use which is already reported by EPCs.

Investigation into setting a Long-Term Non-Domestic Standard

62. Stakeholder responses to the initial high-level SEEP consultation¹² called on Government to create certainty and set out a long-term trajectory for improvement to give property owners the confidence to invest in their stock over the longer term. Accordingly, a range of higher levels of performance will be investigated to determine the viability of also setting a Long-Term Non-Domestic Standard for improvement under the programme from 2020.

Consultation Questions

18. Are there specific building characteristics you consider should be included in research to ensure that future improvement targets reflect the diverse nature of our non-domestic building stock? If so, please set out what these are and why they should be considered.
19. What are your views on the way calculated energy use from building assessments are presented and/or benchmarked? We are particularly interested in what arrangements you favour and how you think they would be useful.
20. What are your views on the proposed planned work to review improvement targets?
21. What are your views on our proposals for phasing the regulations from 2020?

The Programme for industrial users of energy

63. Many industrial businesses use significant energy for heating, cooling, ventilating or lighting their premises as well as their productive processes. We believe that our initiatives to support investment in the energy efficiency of buildings should be aligned and joined-up, where possible, with advice and support to reduce energy consumed on sites as a whole. We are working in collaboration with industrial representatives to align measures to invest in the energy efficiency of existing operations with the Energy Efficient Scotland Programme, taking account of the more bespoke needs of industry.

¹² Which can be found here:

<https://consult.gov.scot/energy-and-climate-change-directorate/scotlands-energy-efficiency-programme/>

Consultation Question

22. Should advice and support to invest in the energy efficiency of industrial or manufacturing buildings align with wider advice and support on how to reduce energy consumed for productive processes? If so, please suggest how improving efficiency in building and 'process' energy could work together, and what opportunities and challenges this might present?

Public Sector Buildings

64. The public sector has a legal duty under the Climate Change (Scotland) Act 2009 to act in the way best calculated to the delivery of national targets when carrying out its functions.
65. The public sector is already an exemplar when it comes to energy efficiency and low carbon infrastructure. The Scottish Government launched the Non-Domestic Public Sector Energy Efficiency (NDEE) Framework in March 2016. This framework has been designed to support Public and Third Sector organisations procure Energy Efficiency retrofit work. To date, 12 projects have been procured through the Framework, with capital investment of around £15 million.
66. In October 2016, the Scottish Government also established the NDEE Unit, to accelerate the number of public sector energy efficiency projects and support our wider ambitions around energy demand reduction. This is a four year single supplier contract, led by Mott MacDonald with a value up to £2 million.
67. In addition, the Scottish Government is providing support to the public sector through interest free Salix loans. Since 2008, the Scottish Government has invested over £38 million in loan funding for 685 public sector energy efficiency projects through Salix Finance. These projects have produced more than £100 million and 480,000 tonnes of carbon dioxide lifetime savings since 2008. 28 of Scotland's 32 local authorities have used Salix loan funding for energy efficiency projects.
68. We want to see the public sector continue to be an exemplar with its own buildings and we hope that all public sector buildings will meet their benchmark ahead of 2040. There is a strong pipeline of projects currently preparing for procurement through the NDEE framework in the coming months with assistance from the Support Unit, as well as many public sector organisations continuing to take advantage of the Scottish Government financial loan support (provided by SALIX).
69. We are currently working to establish an accurate non-domestic baseline on energy efficiency and as part of that we will look to gather information on the energy efficiency of stock across the public sector. This will allow us to work with our public sector partners to consider appropriate timescales for achieving the relevant standards for our public sector buildings.

Consultation Questions

- 23.** What more could the Scottish Government do to encourage the public sector to accelerate energy efficiency across their building stock?
- 24.** What more could the Scottish Government do to encourage the public sector to accelerate heat decarbonisation across their building stock?

THE PROGRAMME AND USE OF EPC DATA (DOMESTIC AND NON-DOMESTIC)

Use of data to support building owners and public bodies

70. Within both the Route Map and this consultation document, we discuss plans to improve the data we gather and the way in which it can be presented, both to support building owners in undertaking improvement and in monitoring and enforcement of regulations.
71. Since December 2008, the lodgement of data to the Scottish Energy Performance Certificate Register (SEPCR) has provided a growing resource which is now being developed to support broader action as we move to the implementation phase of the Energy Efficient Scotland Programme.
72. Recently, we published the first extract of data from the SEPCR. This contains all the data presented on each current EPC and Recommendations Report held by the register with only address data removed.¹³ Further information on the published dataset can be found at www.gov.scot/epc.
73. We are keen to support users, in particular householders and local authorities, in gaining access to the current EPC data in a straightforward manner. The intention is that better use of available information will improve understanding of how buildings can be improved simply and effectively. To support this goal, we are seeking your views on where you would like to see improvement in access to EPC data and to the information in documents such as the EPC and Recommendations Report. We also seek your views on the type of resources or new online tools you would find useful to support broader use of this data.

Consultation Questions

25. What additional data would help building owners in the delivery of the Energy Efficient Scotland Programme? How would this be used?
26. What additional data would be helpful to others in the delivery of the Energy Efficient Scotland Programme? How would this be used?
27. We will investigate the benefit in providing new online resources or tools to support building owners to access and use data to help them improve their properties. What particular types of resources or tools would you find useful and why?
28. In addition to the above, we welcome any specific comments or observations you may have on the future use of the data that is gathered from energy assessments.

¹³ The same dataset for an individual property can be accessed by downloading the EPC and Recommendations Report from the SEPCR at www.scottishepcregister.org.uk. Properties can be accessed via address search or use of the EPC Report Reference Number.

POTENTIAL LEGISLATIVE PROVISION TO SUPPORT THE PROGRAMME

74. We recognise that for a programme as ambitious as Energy Efficient Scotland, it will be necessary to review our existing legislation and to consider what new powers or duties may be needed to underpin the Programme. The Route Map sets out that, as a minimum, we are considering the need for legislation to create a statutory duty for local authorities to develop Local Heat & Energy Efficiency Strategies (LHEES) and for regulation of district heating. We recognise that other new or revised powers or duties may be needed to ensure delivery and funding across all strands of the Energy Efficient Scotland Programme over its 20 year lifetime, and are inviting comment within this consultation on what these may be.
75. Our targets of removing poor energy efficiency as a driver of fuel poverty will be achieved via the Energy Efficient Scotland Programme. However, it is a Fuel Poverty Bill, due to be introduced to Parliament in June 2018, which will set out the new statutory target: to eradicate fuel poverty by 2040. This Bill will also require that we report to Parliament every four years to review progress to date and set out delivery plans for the next four years (as previously committed to under the Housing (Scotland) Act 2001).

76. The draft Fuel Poverty Strategy will set three indicators to measure progress against this target:

- the removal of poor energy efficiency as a driver for fuel poverty;
- the reduction of the overall fuel poverty rate to less than 10% by 2040; and
- ensuring that the median household fuel poverty gap is no more than £250.

Our proposed non-statutory stretch targets for fuel poor homes put forward in this consultation support these aims.

77. The focus of a Fuel Poverty Bill will be on fuel poverty provisions only. However, stakeholders told us in our high-level scoping SEEP consultation during 2017 that there could also be an important role for regulation and standards, supported by legislation. We have committed to develop, if appropriate, a wider Energy Efficient Scotland Bill for later in this Parliament, and this would be the vehicle for any further legislative changes needed to support the Energy Efficient Scotland Programme, beyond the fuel poverty provisions contained in a Fuel Poverty Bill. We are now asking stakeholders what legislation might be needed more widely, that could be included within an Energy Efficient Scotland Bill. If it is considered that an Energy Efficient Scotland Bill is needed to implement the Energy Efficient Scotland Programme, the contents of the Bill will be informed by the feedback received from this consultation.

Existing Legislation

78. There is already a wide range of legislation which gives powers and duties to the Scottish Government, local authorities and energy suppliers to improve the energy efficiency of buildings, and reduce emissions associated with their energy and heat supply. Please see Annex 1 for a list of this legislation.
79. The Scottish Government recognises that this list of primary legislation is not exhaustive, and that there are many items of secondary legislation which derive from these Acts. In ensuring that the Energy Efficient Scotland Programme is underpinned by appropriate legislation in future, we would like stakeholders to comment on whether any changes are needed to existing legislation relating to energy efficiency and heating of buildings in Scotland, to support the Programme moving forward.

Further Legislative provision

80. In the Route Map, we have set out the various elements of the Programme. These include issues such as:
- setting a long-term vision for the Programme
 - setting a Long-Term Standard for improvement of energy performance of domestic and non-domestic buildings
 - requiring improvement in the energy efficiency of buildings to meet required standards
 - amendments to an assessment process, including showing what is technically feasible and cost-effective
 - making an offer of support to building owners and tenants to meet these standards

- requiring local authorities to develop Local Heat & Energy Efficiency Strategies to determine objectives and design delivery programmes, for the improvement of energy efficiency and decarbonisation of heat supply in buildings, to help building owners meet these standards
- giving local authorities powers to regulate the development of district heating in their areas, including powers to consent development, and powers to require public bodies to provide information regarding their heat supply with a view to connecting to district heating networks
- ensuring that consumers are protected in the installation of energy efficiency measures to meet Programme standards, or when connecting to district heating¹⁴
- actions to develop and support the supply chain
- monitoring and evaluation of the Programme

In order to support all of these elements of the Programme, we are currently considering whether legal provision would be needed for:

- New or amended powers enabling Ministers to set a Long-Term Standard(s) for improved energy efficiency and heat decarbonisation of all types of buildings, including potential to review this standard, and associated powers for assessment, monitoring and review of the Programme, and enforcement of standards, if and when needed;
- New duties on local authorities to prepare Local Heat & Energy Efficiency Strategies, setting out how they will deliver the Energy Efficient Scotland Programme over its 20 year period (subject of separate consultations);

14 Bearing in mind that consumer protection is a reserved matter (UK Government responsibility)

- New powers and duties to regulate district heating (including requirements for licensing of district heating operators, and consenting of district heating projects) (subject of separate consultations).

These are the initial areas where we think that further investigation should focus on the need for further provision, if at all. However, we recognise that there may be other areas where legal provision could be needed to support the Energy Efficient Scotland Programme and we would like stakeholders to comment on these issues.

Consultation Questions

- 29.** What are your views on the implementation and enforcement of existing legislation relating to energy efficiency and heating of buildings in Scotland?
- 30.** What changes may be needed (if any) to this existing legislation to ensure that the Scottish Government, local authorities, and any other relevant bodies or persons, have the powers and duties necessary to support the Energy Efficient Scotland Programme?
- 31.** What other elements of the Programme may require new or amended legislation to enable the Energy Efficient Scotland Programme to operate?
- 32.** Which organisation(s) should be responsible for delivering any new legal requirements?

ANNEX 1: EXISTING LEGISLATION

Non-exhaustive list of legislation which gives powers and duties to the Scottish Government, local authorities and energy suppliers to improve the energy efficiency of buildings, and reduce emissions associated with their energy and heat supply.

- The Scotland Act 2016 – sections 58 and 59 amending The Energy Act 2010, section 9, which make provision for fuel poverty support schemes
- The Scotland Act 2016 sections 58 and 59 amending The Gas Act 1986 and the Electricity Act 1989 for energy company obligations
- The Regulatory Reform (Scotland) Act 2014 – section 18 and Schedule 2 make provisions for Regulations relating to protecting and improving the environment, including the provision of information on energy consumption and on the efficiency with which energy is used
- The Energy Act 2011 – Chapter 3 makes provision for energy efficiency regulations for domestic and non-domestic private rented sector properties
- The Climate Change (Scotland) Act 2009 – Chapter 3 makes provision for the promotion of energy efficiency and renewable heat, and the assessment of energy efficiency and emissions from domestic and non-domestic buildings
- The Climate Change & Sustainable Energy Act 2006 – sections 15 and 16 which amend the Gas Act 1986 and the Electricity Act 1986 respectively, place requirements on gas transporters and suppliers and electricity distributors and suppliers to promote reductions in carbon emissions
- The Housing (Scotland) Act 2006 – section 90 makes provision for local authorities to offer support for work to improve energy efficiency and safety of premises
- The Building (Scotland) Act 2003 – section 1 read in conjunction with Schedule 1 makes provision for the Scottish Ministers to make building regulations, including on resistance to the transmission of heat
- The Clean Air Act 1993 – Part III makes provision for the designation of smoke control areas by local authorities (with a role for SEPA), and section 20 of the Act (as amended by section 50 of the Regulatory Reform (Scotland) Act 2014), gives the Scottish Ministers powers to determine authorised fuels for burning in smoke control areas.
- The Environmental Protection Act 1990 – section 153 gives powers to the Scottish Ministers to offer financial assistance to certain organisations for environmental purposes.
- The Social Security Act 1990 – section 15 enables grants to be made for the improvement of energy efficiency in dwellings
- The Local Government (Scotland) Act 1973 – part VIII – makes provisions for local authorities to produce and supply heat and electricity, including powers to construct, lay and maintain pipes and associated works for the purpose of conveying heat produced

RESPONDING TO THIS CONSULTATION

We are inviting responses to this consultation by Friday 27 July 2018.

Please respond to this consultation using the Scottish Government's consultation platform, Citizen Space. You can view and respond to this consultation online at: <https://consult.gov.scot/better-homes-division/energy-efficient-scotland>.

You can save and return to your responses while the consultation is still open. Please ensure that consultation responses are submitted before the closing date of Friday 27 July 2018.

If you are unable to respond online, please complete the Respondent Information Form (see 'Handling your Response' below) to:

**Energy Efficient Scotland Consultation
Energy Efficient Scotland Programme
Management Office
Scottish Government
1H South
Victoria Quay
Edinburgh EH6 6QQ**

It would be helpful to have your response by email or using the electronic response form. The electronic response form can be accessed at the following website address: <https://consult.scotland.gov.uk>. You can also email your response to EnergyEfficientScotland@gov.scot.

Handling your response

If you respond using Citizen Space (<http://consult.scotland.gov.uk/>), you will be directed to the Respondent Information Form. Please indicate how you wish your response to be handled and, in particular, whether you are happy for your response to be published.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public at <http://consult.scotland.gov.uk>.

If you use Citizen Space to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us. Responses will be published where we have been given permission to do so.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to:

**Energy Efficient Scotland Consultation
Energy Efficient Scotland Programme
Management Office
Scottish Government
1H South
Victoria Quay
Edinburgh EH6 6QQ**

Scottish Government consultation process

Consultation is an essential part of the policy-making process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.scotland.gov.uk>. Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, by email or by post.

Consultations may involve seeking views in a number of different ways, such as public meetings, focus groups, or other online methods such as Dialogue ([https:// www.ideas.gov.scot](https://www.ideas.gov.scot)).

Responses will be analysed and used as part of the decision-making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review;
- inform the development of a particular policy;
- help decisions to be made between alternative policy proposals; and
- be used to finalise legislation before it is implemented.

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

Next steps

The Scottish Government will review responses to the consultation and the issues raised during engagement with stakeholders to inform the phased development and implementation of the Energy Efficient Scotland Programme over the next 15-20 years.

Energy Efficient Scotland Consultation: Making our homes and buildings warmer, greener and more efficient.

RESPONDENT INFORMATION FORM

Please Note this form **must** be completed and returned with your response.

Are you responding as an individual or an organisation?

- ☐ Individual
- ☐ Organisation

Full name or organisation's name

Phone number

Address

Postcode

Email

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- ☐ Publish response with name
- ☐ Publish response only (without name)
- ☐ Do not publish response

Information for organisations:

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

If you choose the option 'Do not publish response', your organisation name may still be listed as having responded to the consultation in, for example, the analysis report.

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- ☐ Yes
- ☐ No

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