

Patrick Harvie MSP  
Minister for Zero Carbon Buildings, Active Travel and Tenants' Rights

cc. Mairi McAllan MSP  
Cabinet Secretary for Wellbeing Economy, Net Zero and the Energy

St Andrews House  
Edinburgh  
EH1 3DG

8th March 2024

Dear Minister

## **HEAT IN BUILDINGS BILL AND NEW SOCIAL HOUSING NET ZERO STANDARD CONSULTATIONS**

Today Consumer Scotland has submitted its response to the Scottish Government's consultations on the Heat in Buildings Bill and the New Social Housing Net Zero Standard. We welcome the opportunity to respond to these consultations and are grateful to your officials for providing information and support during the process. These are significant proposals with substantial implications for consumers and this is reflected in our full response to the consultation questions.

We recommend that further modelling and analysis of the impact of these proposals on consumers should be undertaken before the Scottish Government reaches decisions on key aspects of the Bill in order to avoid any unintended detriment. Consumer Scotland, as the statutory body for consumers, is keen to support you with our expertise.

We do not underestimate the challenge of decarbonising homes, nor the significant ask being made of consumers to help to meet the 2045 target. However, we also recognise the opportunity to significantly raise the energy efficiency of buildings in Scotland. This will help facilitate the achievement of climate targets, lead to substantial health benefits and lower energy consumption and potentially bills, all to the benefit of current and future consumers.

Consumer Scotland would welcome the opportunity to engage with the Scottish Government as your work on the Bill progresses to ensure that the impact on both domestic and non-domestic consumers is fully considered. Consumers need appropriate incentives, support and information to engage with the transition to low carbon heating and more

energy efficient buildings. In responding to both consultations Consumer Scotland consulted a range of stakeholders to seek their views and discuss the content of the proposals to consider the impact on both consumers and small businesses.

Consumer Scotland:

- welcomes proposals to introduce a Heat in Buildings Standard for all buildings, with appropriate trigger points to encourage early action upon a relevant change of circumstances and appropriate abeyances provided to consumers who may struggle to meet requirements due to circumstances beyond their control.
- is supportive of proposals for connecting to Heat Networks but sets out a need for greater recognition that connection to a heat network will not always be the optimum solution for all property types or use cases – even in new buildings.
- welcomes plans for unused heat to be used by heat networks where this is technically feasible and cost effective. Developing this concept, we see an opportunity for the Scottish Government to create a new market for waste or unused heat.
- is supportive of proposals for the decarbonisation of Public Sector Buildings. In particular, we see an opportunity for public sector decarbonisation to serve as an accelerant for decarbonisation in local communities. This potentially makes the case for public sector buildings to decarbonise faster, but adequate resourcing is required.
- welcomes the aims of the New Social Housing Net Zero Standard, though notes concerns in relation to the financial impacts on consumers of the relevant investments .

Over the coming months Consumer Scotland intends to further consider the issues associated with the Bill. We feel this will help facilitate understanding of consumer journeys and the potential challenges they could face while decarbonising their homes.

I trust this is helpful and would be happy to discuss further.

Yours sincerely



Sam Ghibaldan