

Annex A Responding to this Consultation Paper

This consultation paper outlines current and proposed government activity relating to energy efficiency, and explores the many issues around both this and the associated economic and climate change challenges. It is intended to initiate debate and will be accompanied by a series of workshops (see the action plan website for details: <http://www.scotland.gov.uk/Topics/Business-Industry/Energy/Action/energy-efficiency-policy/eeapconsultation>). There will be full opportunity to feed in material before the final plan is produced, and we welcome your contribution to the debate.

The Action Plan will be published in early 2010, following this consultation and analysis of the responses. The Action Plan will be much shorter than this consultation document, and will be based on both on the extensive detail published within this and the consultation responses. In addition, we propose to publish both an overview of responses and those responses for which permission has been given (see "Handling your Response" below). We intend that the Action Plan should be a live web-based document, updated with new actions or programmes as appropriate.

We are inviting written responses to this consultation paper by **Tuesday, 5 January 2010**. We would be grateful if you could use the consultation questionnaire provided and clearly indicate in your response which questions or parts of the consultation paper you are responding to, as this will aid our analysis of the responses received. If possible, we would encourage you to submit your responses electronically. It would be helpful if you could refer to particular sections and paragraphs in any detailed discussion.

Please send your response with the completed Respondent Information Form in Annex C (see also "Handling your Response" below) to:

eem@scotland.gsi.gov.uk

or
Consultation on the Energy Efficiency Action Plan for Scotland
The Scottish Government
Business, Enterprise and Energy Directorate
4th Floor, 5 Atlantic Quay
150 Broomielaw
GLASGOW G2 8LU

or visit the on-line form at
<http://www.scotland.gov.uk/consultations/energyefficiencyactionplan.asp>

If you have any queries, please contact Alexandra Stein or Liz Smith on 0300 244 1087.

This consultation, and all other Scottish Government consultation exercises, can be viewed online on the consultation web pages of the Scottish Government website at <http://www.scotland.gov.uk/consultations>.

The Scottish Government now has an email alert system for consultations (**SEconsult**: <http://www.scotland.gov.uk/consultations/seconsult.aspx>). This system allows stakeholder individuals and organisations to register and receive a weekly email containing details of all new consultations (including web links). SEconsult complements, but in no way replaces, SG distribution lists, and is designed to allow stakeholders to keep up to date with all SG consultation activity, and, therefore, be alerted at the earliest opportunity to those of most interest. We would encourage you to register.

Handling your response

We need to know how you wish your response to be handled and, in particular, whether you are happy for your response to be made public. Please complete and return the Respondent Information Form at Annex C as this will ensure that we treat your response appropriately. If you ask for your response not to be published we will regard it as confidential and 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 in the Scottish Government Library by 2 February 2010. You can make arrangements to view responses by contacting the SG Library on 0131 244 4552. Responses can be copied and sent to you, but a charge may be made for this service.

What happens next?

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us finalise the Energy Efficiency Action Plan for Scotland.

Comments and complaints

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

Dr Alexandra Stein
Energy Efficiency Action Plan
The Scottish Government
Business, Enterprise and Energy Directorate
4th Floor, 5 Atlantic Quay
150 Broomielaw
GLASGOW G2 8LU
eem@scotland.gsi.gov.uk

Annex B Consultation Questions

Q 1: Should Scotland's energy efficiency target be based, as discussed, on energy savings achieved or total consumption? Or are there alternative ways in which a target should be set and monitored? If so, what would be the benefits of such an approach?

Q 2: What should be the basis for the energy efficiency target? For example, should any "energy savings achieved" target take into account UK ambition and programmes? If so, how ambitious should Scotland be in its energy efficiency targets compared to the UK?

Q 3: What approach do you consider we should take to setting out how different sectors will contribute to our target? What further evidence should be collected and assessed?

Q 4: What evidence do you have to suggest that the different levels of saving identified in the broad sectoral indications may or may not be achievable?

Q 5: What other research do you think is required, with specific reference to energy efficiency and behaviour change?

Q 6: What more do we need to do to change attitudes and influence behaviour?

Q 7: Various organisations, including EST and the Carbon Trust (which deals primarily with the business and public sectors, see chapters 8 and 9) are currently involved in public engagement. Should we seek to develop a single brand for all energy saving advice in Scotland? If so, why?

Q 8: Do you agree that these are the key concerns for Scottish Government to consider when developing action on energy efficiency in housing?

Q 9: What do you think are the key issues that the Scottish Government should consider in the design and location of new housing and the maintenance and improvement of the existing housing stock to ensure that they are adapted to future climatic conditions?

Q 10: With regard to traditional and historic buildings as defined in footnote 40, what do you think are the most important energy efficiency issues?

Q 11: What is the right balance in funding between Government, landlords and individual households?

Q 12: Taking into account the scale of the challenge and behaviour issues, and the work set out in this chapter and Chapter 7 (housing regulation), what other policies should be taken forward to meet our climate change objectives in respect of housing?

Q 13: If Scottish Government were to prioritise the expansion of any individual existing programme, which should that be, and why?

Q 14: What research and/or consultation needs to be undertaken to determine whether or not the existing Energy Report/EPC regime would be sufficient to provide a basis for regulation?

Q 15: Should energy efficiency standards be applied to all homes, or should the option of targeting regulatory requirements be considered?

Q 16: What are your views on which types of homes and/or neighbourhoods should be targeted?

Q 17: What are your views on which energy efficiency standards should be applied?

Q 18: How regularly should these standards be reviewed?

Q 19: What are your views on the kind of organisation that should manage the enforcement of the standards?

Q 20: What are your views on when regulation should be introduced?

Q 21: Should SG seek to introduce regulation in a way that maximises CERT investment?

Q 22: What support should be provided to low income and/or vulnerable households to enable them to meet the required standards?

Q 23: Should Scottish Ministers seek to regulate to raise energy efficiency standards in the private rented sector ahead of other tenures, or should it introduce requirements that cover all tenures at the same time?

Q 24: Should any regulation of energy efficiency standards in the private rented sector be tackled through the mechanism of the Repairing Standard, or through the broad enabling powers introduced in the Climate Change (Scotland) Act?

Q 25: If the Repairing Standard is used to regulate energy efficiency standards in the private rented sector, should this be done:

- a) by adding the energy efficiency criteria of the Scottish Housing Quality Standard to it;
- b) by adding the energy efficiency criteria of the Scottish Core Standards for Accredited Landlords to it; or
- c) by some other means?

Q 26: Do local councils consider HECA to be important in ensuring that the energy efficiency of all housing stock is a priority for the council?

Q 27: Does the information gathered under the HECA process make a significant contribution to planning local activity on energy efficiency?

Q 28: Should HECA remain as a distinct duty on local councils or should it be incorporated within local housing strategies with local action on energy efficiency reflected, as appropriate, within Single Outcome Agreements?

Q 29: If HECA is retained, what steps, if any, should be taken to improve its effectiveness?

Q 30: Given this information, is there a case for Government to introduce legislation to require business compliance? For example, should there be a minimum criteria required for energy efficiency based on a sub-sector approach to drive a greater up-take of energy efficiency measures?

Q 31: Consideration is being given to the potential role for operational ratings. Should sub-metering be considered for existing non-domestic buildings which are part of a large campus? Or will financial drivers such as the introduction of the Carbon Reduction Commitment be sufficient?

Q 32: How could the Scottish Government improve its understanding of industrial energy end-use consumption in Scotland?

Q 33: What is the role for Scottish Government in regulating the industrial sector to drive a greater up-take of energy efficiency?

Q 34: What more could the Scottish Government, its agencies and the wider public sector be doing to drive a greater up-take of energy efficiency in the SME sector and in non-domestic buildings and processes?

Q 35: What steps could be taken by the Scottish Government to encourage the use of waste industrial heat?

Q 36: Should the Scottish Government use regulation to ensure public bodies undertake energy efficiency measures and place greater emphasis on energy efficiency in their policies?

Q 37: Should energy efficiency targets be set for the public sector as a whole or for individual organisations?

Q 38: Should training on the procurement of energy efficient, low-carbon buildings be rolled out across the public sector?

Q 39: Should energy saving advice be rolled out to staff in all large public sector organisations?

If so, should that advice include only general energy saving information, or should more job-specific advice be developed for staff whose role impacts upon energy consumption on a more significant level (e.g. planners, procurement officers)?

Q 40: Should the Scottish Government introduce greater standardisation of how energy performance is measured and reported across the wider public sector, including the possibility of mandating particular monitoring and reporting tool(s) that enable comparability while meeting the specific needs of particular organisations?

Q 41: Should the Scottish Government seek commitment from all public sector bodies to report energy efficiency progress at their regular board meetings?

Q 42: In your view, what should a follow-up to the Carbon Management Programme include?

Q 43: Which delivery route would be most suitable for energy saving advice to the smallest public sector bodies? The Carbon Trust (through Carbon Management Lite), EST or some other mechanism?

Q 44: How should public sector bodies be funded to deliver energy efficiency improvements? Should organisations wishing to invest in energy saving measures provide co-funding?

Q 45: What more should the Scottish Government and the public sector as a whole do to meet Audit Scotland's concerns? (e.g. so that clear guidance is provided on energy efficiency action required of the public sector, that monitoring and reporting is improved and that energy efficiency best practice is disseminated across the sector)?

Q 46: Given the powers available to Scottish Government, which actions should we focus on to support the deployment of low-carbon district heating?

Q 47: What actions should other key stakeholders, such as local authorities and industry, be encouraged to focus on to support low-carbon district heating. How should Scottish Government help to achieve this?

Q 48: How can Scottish Government best support this activity? Are there partner organisations which can assist?

Q 49: With the introduction of cash-back schemes, should Scottish Government support for small scale low- and zero-carbon technologies be adjusted? If so, how?

Q 50: What more can we do to encourage people to reduce the amount of travel, e.g. through behavioural change or modal shift in their daily lives?

Q 51: What partnerships do we need to create to enable build more sustainable infrastructure and networks and develop new technologies and fuels, e.g. with the transport industry, manufacturers and business users?

Q 52: Is the Scottish Government doing enough to help the wider business community in Scotland to focus on changing how energy is used, and in identifying appropriate and effective energy efficiency measures?

Q 53: On what opportunities should business focus its efforts on, e.g. finding and using less energy intensive materials and developing low carbon processes?

Q 54: What more could the Scottish Government do to help drive innovation and to promote technology investment and opportunity across the extended supply-chain and business community in Scotland?

Q 55: Is there adequate support for energy-efficiency related R&D and the commercialisation of energy efficient technologies? How should this be provided?

Q 56: What could be done to support energy efficiency in the Corporate Social Responsibility agenda in Scotland?

Q 57: What needs to be done to promote the role of ESCOs and Energy Performance Contracting in Scotland?

Q 58: Do we need industrial networks which mirror those of the academic research centres? How should they be set up to deal best with the challenges which affect a large number of stakeholders?

Q 59: How can we ensure Scotland has the skilled workforce needed for the transition to a low carbon economy?

Q 60: Are the actions outlined the right ones at this stage?

Q 61: Is this a fair balance of activity across society?

Q 62: Are there other partners who should share responsibility for delivering energy efficiency improvements

Q 63: How do we best promote private sector investment in energy efficiency?

Q 64: How do we prioritise our financing across government, especially given that we are in a period of tighter resourcing?

Q 65: How can we best develop partnerships (including academics, R&D, local authorities, businesses etc), in which all partners can demonstrate their proactive engagement and ability to promote energy efficiency?

Q 66: How do we tap into and better utilise the resources we have across Scotland?

Q 67: What larger programmes and funds are there, e.g. at EU level, that we can pool together to tap into (either within Scotland or with international partners)? Which international partnerships should we be pursuing?

Q 68: What do you think are the key gaps in sum of actions underway and proposed? Has anything been identified that you consider unnecessary?

Q 69: How do we ensure that our efforts add up to more than a simple summary of all the constituent parts? If so, how might this be?

Q 70: Should we make energy efficiency a core criteria for all major infrastructure investment?

Q 71: How should Scottish Government reduce negative impacts?

Q 72: What equalities implications have not already been considered?

Q 73: What have we missed? What else should we consider?

Annex C Respondent Information Form

Please Note This Form Must Be Returned With Your Response To Ensure That We Handle Your Response Appropriately

1. Name/Organisation

Organisation Name

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Forename

2. Postal Address

Postcode	Phone	Email

3. Permissions

I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

yes no

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

Yes, make my response available, but not my name and address

Yes, make my response and name available, but not my address

(c) The name and address of your organisation will be made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your response to be made available?

Please tick as appropriate

yes no

(d) 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?

Please tick as appropriate

yes no

Annex D The Scottish Government Consultation Process

Consultation is an essential and important aspect of Scottish Government working methods. Given the wide-ranging areas of work of the Scottish Government, there are many varied types of consultation. However, in general, Scottish Government consultation exercises aim to provide opportunities for all those who wish to express their opinions on a proposed area of work to do so in ways which will inform and enhance that work.

The Scottish Government encourages consultation that is thorough, effective and appropriate to the issue under consideration and the nature of the target audience. Consultation exercises take account of a wide range of factors, and no two exercises are likely to be the same.

Typically, Scottish Government consultations involve a written paper inviting answers to specific questions or more general views about the material presented. Written papers are distributed to organisations and individuals with an interest in the issue, and they are also placed on the Scottish Government web site enabling a wider audience to access the paper and submit their responses. Consultation exercises may also involve seeking views in a number of different ways, such as through public meetings, focus groups or questionnaire exercises. Copies of all the written responses received to a consultation exercise (except those where the individual or organisation requested confidentiality) are placed in the Scottish Government library at Saughton House, Edinburgh (K Spur, Saughton House, Broomhouse Drive, Edinburgh, EH11 3XD, telephone 0131 244 4565).

All Scottish Government consultation papers and related publications (e.g. analysis of response reports) can be accessed at: [Scottish Government consultations \(http://www.scotland.gov.uk/consultations\)](http://www.scotland.gov.uk/consultations).

The views and suggestions detailed in consultation responses are analysed and used as part of the decision making process, along with a range of other available information and evidence. 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;
- be used to finalise legislation before it is implemented.

Final decisions on the issues under consideration will also take account of a range of other factors, including other available information and research evidence.

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.

Annex E: Acronyms

CCC	Committee on Climate Change
CERT	Carbon Emissions Reduction Target
CESP	Community Energy Saving Target
CHP	Combined Heat and Power
COSLA	Confederation of Scottish Local Authorities
CPPs	Community planning Partnerships
CT	Carbon Trust
EAP	Energy Assistance Package
EC	European Commission
EPC	Energy Performance Certificate
EST	Energy Saving Trust
EU	European Union
EVs	Electric Vehicles
GHG	Greenhouse Gas
GDP	Gross Domestic Product
GVA	Gross Value Added
HECA	Home Energy Conservation Act
HEED	(Energy Saving Trust) Housing Energy Efficiency Database
HESP	Home Energy Saving Programme
HESS	(UK) Heat and Energy Saving Strategy
HGV	Heavy Goods Vehicle
HIE	Highlands and Islands Enterprise
HIS	Home Insulation Scheme
kWh	kilowatt hour(s)
LAs	Local Authorities
LESA	Landlord's Energy Saving Allowance
LGV	Light Goods Vehicle
LHS	Local Housing Strategy
Mt	mega tonne(s)
MtCO ₂ e	megatonnes of carbon dioxide equivalent
NO _x	Nitrogen oxide
OECD	Organisation for Economic Co-operation and Development
OGC	Office of Government Commerce
RAP	Renewables Action Plan
R&D	Research and Development
RD&D	Research, development, demonstration and deployment
RESG	Renewable Energy Skills Group
RHAP	Renewable Heat Action Plan
SDS	Skills Development Scotland
SFC	Scottish Funding Council
SE	Scottish Enterprise
SEON	Scottish Energy Officers Network
SEPA	Scottish Environment Protection Agency

SG	Scottish Government
SNH	Scottish Natural Heritage
SOAs	Single Outcome Agreements
SSC	Sector Skills Council(s)
SSCI	Scottish Sustainable Communities Initiative
t	tonne(s)
TWh	terawatt hour(s)
WRAP	Waste and Resources Action Programme