



Response to:
“Consultation on the promotion of energy end-use efficiency and energy services. Implementing Article 5 of Directive 2006/32/EC in the UK.”

This submission is from the insulation industry and has been produced by the National Insulation Association (NIA) in association with the Cavity Insulation Guarantee Agency (CIGA).

The NIA represents the manufacturers and installers of insulation products including cavity wall insulation, loft insulation and other innovative products

CIGA provide independent 25 year guarantees for cavity wall insulation fitted by registered installers. CIGA was established in consultation with the Government to provide householders with an independent, uniform and dependable guarantee covering defects in materials and workmanship.

We have consulted widely in producing this response and have no objection to its contents being made public.

It is important that at a time when the public are being encouraged to improve the energy efficiency of their properties, and the private sector is showing a lack of will to tackle the carbon emissions of their businesses premises that the Government takes a lead and acts by example. There is significant scope for improvements within the public sector through the installation of insulation measures to the building fabric, the most cost effective energy efficiency improvement, and it is vital that this is carried out.

Within Annex VI it is essential that one of the choices taken by Government is in relation to buildings in order to derive the long term benefits from improving the building fabric.

The key issues we believe should be focused on moving forward are:

- Voluntary agreements have historically led to little beneficial impact for lower energy users such as those within the public sector and therefore regulation is required for the key 'gaps' in UK compliance;
- Action is needed in the implementation of the Directive to ensure that the public sector improves their carbon footprint via the uptake of energy efficiency measures and;
- The UK should not focus simply on meeting the basic requirements of the Directive at the expense of the desired outcome i.e. the installation of energy saving measures in end users properties and plant. The UK needs to seek the optimum policy initiatives for each category of energy end user rather than following the process based options of the Directive. We believe if such an approach is adopted then it will be more effective and automatically meet the requirements of the Directive.

- **Detailed Questions**

2. Do you agree the issues summarised in the two bullet points above are the key elements in determining whether a public sector body is fulfilling an exemplary role?

This is a basic approach which does meet the absolute minimum but does not fully demonstrate an exemplary role. However, it would be far more ambitious to set stringent targets as to how the public sector will 'show leadership' through achieving a higher rate of performance and improvement than the private sector.

7. Are further measures required to ensure that the devolved Scottish public sector is compliant with this option? What should these measures be?

It is essential that the requirements of the Energy Performance of Building Directive and other audits mean that where cost-effective energy efficiency improvements are highlighted these **must** be installed within a certain period of time. This commitment to making improvements (where cost-effective) should be implemented throughout the UK with no geographical gaps.

8. Do you agree with the assessment of the current gaps in policy for the measures for Annex VI?

There are clear gaps in compliance within this area and which are highlighted in the text. It is essential that these gaps are closed as soon as is possible.

9. Do you agree that guidance on energy efficiency and energy savings a possible assessment criteria in procurement should be improved?

There is a clear need for guidance AND then action to ensure that the guidance is strictly adhered to.

10. Do you think that best practice and the actions being taken by the public sector to improve energy efficiency could be communicated more effectively?

There is a great deal of information available however, this can be very difficult to interpret for those most in need of it and can be somewhat confusing due to the number of bodies producing information. A central and focussed source and point of contact for all such information would be beneficial.

13. Do you agree that Government should seek a voluntary approach to meeting compliance?

As stated above we do not feel that a voluntary approach alone would be the most suitable, effective or appropriate approach if the Government wishes to show leadership

on climate change within the public sector. Such an 'easy' solution to comply with European legislation risks not delivering the key objective viz. the reduction of energy consumption.

Voluntary agreements have historically had a poor record in effecting change for lower fuel users which is why the Government has legislated in all the areas where it wants effective action taken. Therefore, not to do so in this area could indicate a reluctance and lack of commitment to tackle climate change and would be a serious missed opportunity.

14. Do you agree with the key characteristics of the voluntary arrangements set out above?

As stated above we do not believe that voluntary arrangements alone will affect change as the spirit of the Directive requires.

15. How do you think the voluntary arrangements should be monitored?

If Government does choose this arrangement then it must be robustly and independently monitored in order to ensure that if it is found that it is not having the same affect as an equivalent legislative option, this can be easily identified and corrective action taken

20. Do you agree that we should build on existing reporting arrangements wherever possible or should a duty be placed on all public bodies to report energy data?

To ensure that comparable, quality energy usage is reported annually a duty should be placed upon all public bodies to do so. To ensure this is fully comparable then a clear methodology for how this is carried out must be provided to all such bodies. The HECA reporting arrangements clearly demonstrated that where such a methodology is not

developed prior to implementation then the data provided will vary in quality and robustness.

21. Do you agree with the proposal to implement options b) and c) from Annex VI? If not which options do you think should be implemented?

Whilst there will be some limited benefits from implementing these options we believe that there it will be essential to implement: (e) Requirements to use energy audits and implement the resulting cost-effective recommendations; (f) Requirements to purchase or rent energy-efficient buildings or parts thereof, or requirements to replace or retrofit purchased or rented buildings or parts thereof in order to render them more energy-efficient.

22. Should the public sector be implementing more than two measures from Annex VI?

Making public buildings more energy efficient by retrofitting cost effective measures not only reduces running costs but demonstrate true leadership to our European neighbours. In relation to the Building Fabric we should state that buildings should achieve a defined degree of energy efficiency by x date and achieve this. At the very least this should involve at least options e and f being implemented.

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