



Energy Efficiency & Microgeneration Strategy Consultation  
Energy Efficiency Unit  
Scottish Executive  
2<sup>nd</sup> Floor Meriden Court  
5 Cadogan Street  
Glasgow  
G2 6AT

12<sup>th</sup> June 2007

**Ref: National Insulation Association Response**

Dear Sir/Madam,

Please find enclosed our response to the 'Energy Efficiency & Microgeneration: Achieving a low carbon future' Consultation.

We are pleased to allow this response to go public, should you require any further information please do not hesitate to contact us.

Yours faithfully

**John Mason**  
Head of Policy & Communication  
National Insulation Association  
Tel: 01525 383313  
Mob: 07917 100 237



## **Response to the Scottish Executive document:**

### **'Energy Efficiency and Microgeneration: Achieving a low carbon future'**

This submission is from the National Insulation Association (NIA). The NIA represents the manufacturers and installers of insulation products including cavity wall insulation, loft insulation and other innovative products. The insulation industry within Scotland was consulted widely to produce this response and we have no objection to its contents being made public.

We welcome the publication of this document and hope that this will pave the way to a more ambitious approach in Scotland to tackling climate change. Scotland has already demonstrated its leadership by outperforming the rest of the UK in this important policy area and this is something which must be consolidated over the next few years.

Both energy efficiency and Microgeneration have an important role to play in both the domestic and business sectors. Energy efficiency and specifically insulation is THE most cost effective solution to reducing carbon emissions and therefore the opportunities for increasing the rate of take-up of such measures is vital to the success of this strategy. Also, Microgeneration measures are far more effective when installed in a property which has effective insulation. This has been recognised by the DTI's Low Carbon Building Programme where grants for Microgeneration are subject to the property already having sufficient levels of insulation. **Such an approach should be adopted in Scotland for any incentives for such measures.**

If further information would be helpful on any of the issues raised below or any other aspects of the Consultation then we would welcome providing this in writing or to arrange a meeting with representatives of the Executive. Contact details are provided at the end of this document.

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

Such an overall strategy is an important first step in improving the energy efficiency of the housing stock. Our industry fully supports this strategy and looks forward to working with the Scottish Executive and others in meeting the challenging objectives which are being set.

However, producing such a strategy is only a first step – what will set the ambition of the Scottish Executive will be the detail of how energy efficiency is

to be tackled – especially in the two most important areas of domestic retrofit installation and the small business (micro-business) market (See Question 2).

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

The key actions as outlined seem sensible. However the Scottish Executive’s proposals are not ambitious enough and must be supported by a systematic business plan approach within each policy area to clearly demonstrate to both industry and the public that the present level of inefficiencies in relation to carbon must end. Of prime importance and a matter of priority must be a clear and coherent business plan which will outline how we will meet our overarching carbon targets for the following two areas of potential:

**Household Retrofit Insulation**

For the UK as a whole in 2003, space heating accounted for 53% of carbon dioxide emissions in the UK. Over 40% of the UK’s projected energy savings for the household sector are expected to come from insulation, such as cavity wall and loft insulation. This corresponds to around 200 MtC over the lifetime of the measures, nearly 15% of the annual household emissions in the UK. Therefore the biggest carbon challenge is to significantly tackle the real “energy wasters”, the existing housing stock.

Energy efficiency and specifically insulation are the most cost-effective measures to improve the carbon footprint of the housing stock and the technology is well developed and proven.

Some figures below taken from the Scottish House Condition Survey highlight the potential for insulation measures to be installed:

**Loft Insulation**

Level of loft insulation	000s	% of all dwellings with loft
None	136	8
25mm	61	4
50mm	173	10
75mm	160	10
100mm	585	35

**Wall Insulation**

Age of dwelling				Total		
Pre-1975			Post-1975			
Type of insulation added to walls	000s	% of all pre 1975 dwellings	000s	% of all post 1975 dwellings	000s	% of all dwellings
Cavity fill	263	16	31	6	294	13

External/internal	66	4	4	1	71	3
-------------------	----	---	---	---	----	---

This is an issue of prime importance and whilst we welcome the initiatives being made it is vital that the poor insulation levels in the existing housing stock are tackled in a systematic manner.

### **Insulation in the micro-business sector**

Of particular concern are smaller businesses and especially those now classified as micro-businesses (less than 10 employees) – where there is a policy gap at the moment. Such businesses premises share many of the physical attributes of the residential sector and therefore would not present technical problems in lifting their extremely poor levels of insulation. A policy lever to raise such standards in a systematic way should be investigated as a matter of urgency, such as a ring-fenced carbon reduction programme within this sector through either the provision of grants or regulatory responsibility on energy suppliers.

In both this area and the domestic retrofit sector further work and frameworks are required immediately and our industry would welcome the opportunity to work with the Government to meet these goals.

### **3. The draft Strategy states that we will consider targets to be included in the final Strategy and Action Plan:**

#### **a) Do you have any views on the specific targets referred to within the draft?**

Any targets set need to be as challenging and as ambitious as possible whilst being realistic. It would be sensible for the Executive to build some flexibility into the framework to ensure we can adapt to the changing situation internationally and scientifically.

An additional test should be an international comparison between the level of carbon reductions achieved by Scotland as compared to other developed nations and the rest of the UK. To reinforce Scotland's position as a leader in this field the Executive must legislate an ambition to at least match the reductions achieved by other countries in the UK and beyond and ideally that further. Such a position will encourage other nations to achieve more and underline Scotland's standing as a leader in this field.

#### **b) Are there any other targets which you believe should be considered?**

Individual targets need to be set within this strategy for the two key policy areas outlined above – namely the household retrofit insulation market and the micro-business sector. Within each of these markets the potential for saving can be easily gained from initiatives such as the Scottish House Condition Survey and a goal of for example ensuring all cavity walls and lofts in Scotland are insulated to a 'reasonable' level within 10 years.

We would welcome the opportunity to work with the Executive in how these could be formulated to ensure that they are cost-effective and to maximise the benefits of developing a robust delivery plan.

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

Microgeneration will bring a great number of benefits to householders and business. However, research carried out by the Building Research Establishment, the Energy Saving Trust and Government has clearly demonstrated that the benefits of such technologies can only be fully appreciated in a well insulated property. Therefore, the Executive should ensure that any property which is fitted with Microgeneration technology is suitably insulated first.

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

The insulation industry in Scotland and our Association welcome the opportunity to work with the Executive and others in reducing carbon emissions. There is capacity within the industry which is not being fully utilised in Scotland. Therefore our industry is now geared up and prepared to deliver demanding targets or initiatives and look forward to these being established by the Executive.

**For further information on any of the areas covered above please contact:**

John Mason  
Head of Policy and Communications  
National Insulation Association  
2 Vimy Court, Vimy Road, Leighton Buzzard, LU7 1FG  
E-mail: [john.masonnia@tiscali.co.uk](mailto:john.masonnia@tiscali.co.uk)  
Mobile: 07917 100237  
Telephone: 01525 383313

June 2007