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Your Ref:

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13 July 2007

By e-mail: sarah.hart@scotland.gsi.gov.uk

Dear Ms Hart

CONSULTATION ON ENERGY EFFICIENCY AND MICROGENERATION: ACHIEVING A LOW CARBON FUTURE: A STRATEGY FOR SCOTLAND

The Scottish Environment Protection Agency welcomes the opportunity to respond to the above consultation. SEPA believes that energy efficiency has a major part to play in reducing Scotland's greenhouse gas emissions, and that combined with microgeneration can be used to demonstrate to both individuals and businesses that their actions really can make a difference.

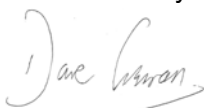
SEPA believes that although they have recently improved there is still a considerable amount that can be achieved through better building standards and improved building design, but that this has to be coupled with a thorough audit process which measures and assesses that compliance - are the buildings constructed today actually achieving the energy and carbon saving expected?

SEPA believes that wide scale use of low carbon microgeneration has many benefits, in reducing the emissions from a site and reducing the need for a larger scale generation plant and infrastructure. SEPA believes that one of the great advantages of this approach is the educational benefit to the occupants, providing a positive reinforcement for changed behaviour.

Energy use in Scotland is broadly split equally between three sectors, domestic, business and transport, and it is essential that all three sectors are tackled to ensure that the necessary greenhouse gas emission reductions are achieved and that each sector is seen to play its part in this achievement.

Detailed answers to the specific consultation questions are given in Annex 1. As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record. SEPA would welcome further discussion on these issues. Please feel free to contact Peter Singleton, Emerging Issues Unit Manager, at the address and number shown below.

Yours sincerely



Dave Gorman
Head of Environmental Strategy

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CONSULTATION ON ENERGY EFFICIENCY AND MICROGENERATION: ACHIEVING A LOW CARBON FUTURE: A STRATEGY FOR SCOTLAND

Annex 1

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?

SEPA believes that energy efficiency has a major part to play in reducing Scotland's carbon footprint, and that when combined with microgeneration can be used to demonstrate to both individuals and businesses that their actions really can make a difference.

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

For the domestic sector: SEPA fully supports the drive to improve the energy efficiency of the domestic sector, but this has to be matched by a reduction in greenhouse gas emissions. There is anecdotal evidence that the present financial incentives for domestic microgeneration need to be optimised.

For the business sector: SEPA actively supports the drive to increase resource and energy efficiency in the business sector. We are currently revising our provision of such advice to business, and are very keen to ensure that all the resource efficiency advice providers work together to ensure a seamless network for business. Our current understanding from business is that there is presently some confusion about who provides what advice on what to whom.

For the public sector: SEPA firmly believes that the public sector has to demonstrate leadership in this field, and to that aim we have set ambitious environmental performance targets internally, as well as developing a climate change action plan for SEPA. If the public sector can show how energy efficiency and micro-renewables can be used to drastically reduce greenhouse gas emissions, they can then be promoted as good practice to other sectors.

There is evidence that the public private partnership system has worked against the installation of micro-renewables due to up front costs and maintenance issues. SEPA believes that the concept behind the CEEF, if not the scheme itself, should be extended across the entire public sector so that systems can be put in place to meet increasingly more stringent environmental performance targets. SEPA also believes that it is essential that the public sector tackles its use of transport and embraces new technology and working practices to reduce our transport based emissions.

In our buildings: SEPA believes that improving building energy efficiency and the use of microgeneration is an essential component of moving towards a low carbon society. The energy performance commitment and use of certificates will include a new raft of organisations into this area. An increasing use of microgeneration, alongside local storage, has the potential to make significant reduction in greenhouse gas emissions. To facilitate this, SEPA supports permitted development rights for microgeneration, with associated safeguards for the historic and natural environment. If microgeneration is to play a significant role in reducing the emissions from a building, then targets and performance measures will be required to ensure that these reductions are realised.

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 specific targets referred to within the draft?*
- b) Are there any other targets which you believe should be considered?*

Broadly speaking SEPA believes it is important to have both short and medium term targets to ensure that progress is made quickly, but also to establish a clear signal to the markets and individuals that investment in energy efficiency and microgeneration will be supported and rewarded.

It is important that targets are set for all three of the main contributors to Scotland's energy use, namely transport, domestic and business sectors.

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?

Although the Strategy refers to transport at various points it is essential that this strategy links into other strategies on Scotland's and the UK's transport infrastructure. Energy consumption and greenhouse gas emission from transport are presently growing faster than the other sectors and it is important that this is addressed.

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?

As previously stated SEPA already provides guidance to business on resource use, and is currently developing a Climate Change Action Plan which includes actions to support regulated businesses in reducing their greenhouse gas emissions.

As an organisation SEPA has a long history in running an environmental performance system, including a published and verified environmental report. SEPA is committed to reducing its environmental footprint and supporting the public sector in leading in this field.

SEPA
13 July 2007