

## Quidos response to DECC Consultation:

### Display Energy Certificates: current regime and how it could be streamlined and improved

Quidos are an accreditation scheme for energy assessors, and represent numerous assessors for domestic and non-domestic building energy assessments.

In principle Quidos strongly supports the Government in any attempt to better use the wealth of information created by the EPBD regulations. In our opinion the consultation highlights the enormous value of Display Energy Certificates, and the benefit they can provide to the public sector.

**A reduction of frequency of mandatory reports would be counterproductive, with predicted rising energy bills and ever increased fiscal restrictions on public services, anything that can reduce consumption should be promoted.**

#### ANSWERS IN RESPONSE TO SPECIFIC CONSULTATION QUESTIONS:

Part 1	QUIDOS RESPONSE
Question 1 - How could the existing enforcement regime be improved?	<p>It is appreciated that the Government have admitted that the current enforcement regime is not fit for purpose.</p> <p>As detailed in a report into EPBD enforcement we published 4 years ago (link: <a href="http://quidos.co.uk/documents/Quidos_EPBD_Enforcement_Investigaton.pdf">http://quidos.co.uk/documents/Quidos_EPBD_Enforcement_Investigaton.pdf</a>) our conclusions remain the same, that 200 separate trading standard departments in England, Wales and Scotland have insufficient individual resource to appropriately police the EPBD regulations.</p> <p>Northern Ireland have adopted a collective model with just one unit implementing all enforcement across the country with vastly improved compliance rates. It should be highlighted that the carrot, rather than the stick has been the far more successful method to encourage this.</p> <p>Thus several regional units in England, Wales and Scotland, covering multiple trading standards departments providing education, advice and compliance checking would be far more successful than the current model. The current annual £1.9million currently provided by DCLG could cover the costs of implementation and operation.</p>

Question 2 – How may the barriers to enforcement be overcome?	<p>It should be highlighted that enforcement is but one way to increase compliance, and ultimately it is not just compliance that we all seek to improve but the reduction of energy consumption (which can be from the recommendations on DEC's), which leads to lower operational costs.</p> <p>This consultation focuses on DEC's which are required predominantly by the Public Sector, so any reduction in operational costs will benefit all society – except perhaps the foreign owned energy companies.</p>
Question 3 - Who should be the enforcement body for the display of energy certificates in public buildings regime, and why?	<p>There is currently a huge conflict of interest as the Local Trading Standards are unlikely to penalise their own local authorities. Therefore a regionalised approach as outlined above would counter this.</p> <p>It would also make sense to allow these regional groups to employ private sector organisations to enforce the legislation under contract. The fines collated could be used to fund these contracts.</p>
<b>Part 2</b>	
Question 4 – Should the existing system of Display Energy Certificates and recommendation reports remain unaltered?	<p>The central problem is that the efficiency recommendations contained in a DEC are rarely implemented, possibly because those responsible for public building maintenance are rarely the occupiers.</p> <p>Hence there are still Municipal, University, Schools, and Hospitals (“MUSH”) buildings not using LED lighting (just one example), when the operational cost benefits far exceed the initial capital outlay.</p> <p>Thus the cost of obtaining a DEC is not repaid by implementing some of the cost saving initiatives contained within.</p> <p>Therefore the existing system should be enhanced rather than diminished, with all public buildings AND buildings that are visited by the public (regardless of size) should have an annual DEC.</p>
Question 5 – Should the exemptions from the requirements of the Directive be applied to qualifying buildings for Display Energy Certificates?	<p>No – All buildings’ energy consumption can be improved to save money and reduce CO2 emissions. DEC's provide a useful tool in monitoring this as they record and compare the operational energy use of a building regardless of the physical attributes.</p>

Question 6 – Should those buildings that have and display their Energy Performance Certificate be exempt from the requirements to have a Display Energy Certificate?	No – An EPC is not a DEC. The definitions, benefits and differences of each you should be familiar with.
Question 7 – Should an energy certificate be required when 500m <sup>2</sup> is occupied by public authorities and frequently visited by the public?	<p>It should be remembered that all public buildings regardless of whether they are visited by “members of the public” are paid for by “members of the public”.</p> <p>It is therefore in the interests of these individuals who are not “members of the public” but spend money in operating buildings behind closed doors, that they should be accountable for energy consumption and the continual efforts to reduce that consumption. A DEC provides useful advice in comparing similar type buildings and the cost of energy consumed.</p>
Question 8 – Should the validity period of all Display Energy Certificates and their accompanying recommendation reports be five years?	<p>No. Monitoring the energy consumption annually ensures the benefits of improvement measures are monitored soon after their introduction and can be reproduced elsewhere if successful or altered if not.</p> <p>Comparison is only useful if the frequency of reporting is of a timeline that is within a timeframe that allows sensible data measurements.</p>
Question 9 – Should the validity period of all Display Energy Certificates and their accompanying recommendation reports be 10 years?	No – as above (Q. 8)
Question 10 – Should the Display Energy Certificate regime be altered in the way outlined above?	No. A dilution of the current regime would have a further negative impact on compliance, and the entire benefit of energy consumption reduction would be diminished.
Question 11 – Should the mandatory Display Energy Certificate regime be abolished?	No. There is no benefit to any part of society in this suggestion. DEC's alter energy consumption habits through human behaviour and building fabric improvements, which in turn benefits the public purse and the climate (via a reduction in CO <sub>2</sub> ).

Question 12 – If Display Energy Certificates were no longer a statutory requirement, would you still obtain one (for example in order to monitor the energy efficiency of any non-dwelling)?	<p>N/A for our organisation, yet it is obvious that without a statutory requirement volumes would drop dramatically.</p> <p>As a comparative suggestion : If the statutory requirement to pay tax were removed, it is likely that less tax would be collected.</p>
Question 13: Which proposal (or combination) is your preferred outcome?	Any proposal should extend the benefits of DEC's to a greater number of buildings (both public and private) in order to provide a cost effective tool to reduce energy bills and reduce the demand on the public purse
Other comments:	<p>The consultation document mentions in paragraph 21, <i>“energy intensity (energy consumption per metre square of floor space) fell by 2% more between 2008 and 2009 for public buildings with Display Energy Certificates than comparable private sector buildings”</i>. This fact demonstrates how DEC's can work to reduce energy consumption and potentially save more money than they cost.</p> <p>The positive impact of DEC's is further evidenced by the DECC article <i>‘What is the impact of Display Energy Certificates?’</i><sup>1</sup> The cost savings have not been factored into the ‘costs’ incurred by public authorities. Rather than DEC's adding cost to the public purse, the evidence suggests DEC's actually reduce costs.</p> <p>The Consultation document quotes costs of EPC's and DEC's are not a true reflection of the ‘real world’. The real cost of EPC's are considerably more than has been listed in the document. Many buildings operated by public authorities are large (greater than 1000m<sup>2</sup>) and these buildings will require fees far in excess of £150 mentioned. Hospitals and university buildings may well be Level 5 buildings where the EPC can cost several thousand pounds. DEC's tend to take the same time to produce regardless of the building's size. Therefore in comparison, DEC's are far more cost effective than EPC's and provide more relevant data to use as a tool to reduce energy costs.</p>

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 Director  
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<sup>1</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/208613/display\\_energy\\_certificates.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/208613/display_energy_certificates.pdf)