The voice of our sustainable built environment

# **Consultation Response:** Reforms to the Energy Performance of Buildings regime

February 2025

The UK Green Building Council represents the voice of the UK's sustainable built environment industry. We are a charity powered by more than 700 members from banks, large estate owners, housebuilders, and manufacturers to innovative startups, universities, local councils and government departments - all working to transform the built environment in the face of the climate, nature and cost-of-living crises.

Energy Performance Certificates (EPCs) are vital for understanding the impact our buildings have on our bills, our health, and our environment – this consultation is an important step towards updating a tool which will be crucial for meeting our net zero commitments, upgrading the quality of our built environment, and empowering individuals to transform their energy usage and improve their buildings. The Warm Homes Plan, which aims to upgrade five million homes by the end of the current parliament, requires an EPC system that is fit for purpose as an important tool in reducing energy bills and carbon emissions.

We welcome this consultation and the renewed commitment from government to ensure that EPCs are fit for purpose. We're particularly pleased to see recognition that domestic EPCs need to focus more on reducing carbon emissions and supporting people in reducing their energy costs. It is encouraging that the government has left the door open for future metrics which must prioritise information on actual energy use, health and climate resilience.

The vision for a reformed framework is one that reflects modern policy priorities ensuring it is efficient, relevant, and aligned with goals such as net zero, the Warm Homes Plan, and reducing fuel poverty. Buildings account for around 20% of the UK's greenhouse gas emissions, and improving building energy performance is crucial to meeting net zero targets.

The government is proposing to use multiple metrics on EPCs to provide a more comprehensive view of a building's energy performance. We welcome this as the current single headline metric is insufficient to meet diverse consumer and policy needs. The proposed metrics are welcome, but we argue for greater weight to be given to a carbon metric, the need for inclusion of climate risk metrics, and numerous consumer testing and awareness campaigns to ensure new metrics are not alienating and do no result in inaction.

In this response, drawn from consultation with our members, we advocate for an EPC system which is more dynamic, adapting to technological advancements and changing consumer behaviour to encourage innovation and the adoption of effective solutions which will bring down carbon and address fuel poverty.

We welcome the opportunity to respond to this consultation and look forward to a response and further consultations in due course as the Government implements reforms.

## 1. Updating what EPCs measure through additional metrics

**Question 1**

To what extent do you agree or disagree that information using an energy cost metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning, and provide any evidence to support your view.

- Domestic: Estimated energy costs are a key metric, helping householders –both homeowners and renters–understand bill impacts and compare properties. A cost rating is an effective way to drive performance improvements, but it must be improved beyond the outdated EER by using energy use intensity and fuel costs. The metric should track fuel poverty targets, update dynamically with energy prices, and provide annual cost estimates based on typical usage - the EPC could link to an online tool which would allow the householder to create a bespoke assessment of their expected energy cost tailored to their inputted energy behaviours. While concerns exist about its impact on low-carbon heating adoption, the focus should be on using accurate fuel prices rather than avoiding the metric. However, as costs fluctuate, it should not be the basis for stable policy interventions like grants or standards, which should rely on efficiency, flexibility, or carbon measures.

- Non-domestic: As the cost of energy for non-domestic buildings varies so widely depending on the use of the building and activities carried out within it, an energy cost metric would be of little use to prospective owners or occupiers, and would

be of less use than the current headline carbon metric in supporting the decarbonisation of existing buildings.

**Question 2**

To what extent do you agree or disagree that information derived from a fabric performance metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- Fabric performance is crucial for thermal comfort and reducing energy demand. There is concern that a fabric metric might be too complex for consumers, leading to inaction instead of addressing comfort and damp risks. If included, the EPC should clearly link fabric ratings to occupant benefits and health. The government should also ensure ventilation is incentivised, as current ratings don't account for air quality. Future versions should consider an overheating metric, given over half of UK homes currently at risk of overheating (Arup report for the Climate Change Committee, 2022).

- For non-domestic buildings, fabric performance can be a useful metric to inform asset managers where potential efficiency improvements may lie and help prioritise investment in upgrades across the fabric itself, building systems, and energy use optimisation.

~~**Question 3**~~

~~When evaluating the fabric performance of buildings, which methodology do you think should inform the basis of calculating a fabric metric? Please select one option for each building type.~~

~~**Domestic buildings**~~

- ~~No preference~~
- ~~Don't know~~
- ~~FEES~~
- ~~HLP/HTC~~
- ~~Other~~

~~**Non-domestic buildings**~~

- ~~No preference~~
- ~~Don't know~~
- ~~FEES~~
- ~~HLP/HTC~~
- ~~Other~~

~~If you wish, please explain your reasoning and provide any evidence to support your view.~~

**Question 4**

To what extent do you agree or disagree that information based on a heating system metric should be displayed on EPCs ? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree

- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- A well-performing home should use efficient, low-carbon heating, but a dedicated heating metric may be unnecessary. Carbon, energy use, smart readiness, and cost metrics already capture key aspects of heating performance. A carbon metric offers a clearer link to outcomes and can guide consumers toward low-carbon options more effectively than a heating system ranking. We have concerns about an overly complicated ranking system lacking meaningful new insights, being hard to maintain in a technology-agnostic way, and risk stifling innovation. It could also drive consumers toward the bare minimum and cheapest option rather than the best solution for their home and the grid. Additionally, it would struggle to account for regional differences and communal/district heating considerations, whereas a carbon metric would capture the intensity variations between systems.

- For non-domestic buildings, the simplicity and readability of EPCs is less of a consideration as they're more likely to be used by agents and asset managers who have a deeper understanding of building performance, and so the more useful information that can be included in a straightforward way (without adding undue cost to the assessment) the better informed prospective owners and occupiers will be. The type of heating systems of buildings will be an important element of asset managers' planning for net zero.

**Question 5**

What are your views on the design principles and the scope for a Heating System metric? Please provide evidence where possible.

- If implemented, a heating system effectiveness scale should consider both carbon emissions and efficiency while allowing room for innovation. The metric should avoid incentivising only decarbonisation or promoting low-cost but inefficient systems. Key considerations include preventing high-cost direct electric heating from replacing cheaper fossil fuels (especially in rental properties and fuel-poor areas), accounting for regional grid capacity, and ensuring system suitability based on fabric performance and usage. Barriers to new technologies, such as SAP's Appendix Q and PCDB process, must also be addressed. As above, a carbon metric would allow a more impartial and flexible approach for homes, allowing for regional and tailored decarbonisation solutions.

**Question 6**

To what extent do you agree or disagree that information based on a smart readiness metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Question 7**

What are your views on the definition, design principles and the scope for a smart readiness metric? Please provide evidence where possible.

- We support a smart readiness metric as part of the government's plan to expand consumer-led flexibility by 2030. We supported the Centre of Net Zero's proposal for a Smart Building Rating (SBR), the potential and technical requirements of which are included in the latest report, Net Zero Building Metrics (2025). Demand flexibility must be reflected in building performance, as it offers consumer benefits. Developing this metric requires a robust framework, clear communication, and collaboration with industry to incentivise smart upgrades. It should give due consideration to regions with grid constraints and shared energy systems, as well as the environmental (embodied and ecological) impact of smart technologies. Consumer awareness of smart technologies is currently low, posing a risk of confusion and potential exclusion of lower-income households. However, clear messaging and effective guidance should increase understanding about the importance of energy demand and control and accessibility to smart technologies.

**Question 8**

To what extent do you agree or disagree that information from an energy use metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree

- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- Energy use (kWh/yr) should not be a headline EPC metric but included in an advanced view alongside energy use intensity and peak demand. While valuable for built environment professionals and alignment with voluntary standards, it is less relevant and often confusing for consumers (energy use data also underpins the cost and carbon metrics which are more relevant to households).
  Energy use metrics are crucial for assessing efficiency and informing financing decisions. Using real, reported energy consumption—rather than modelled estimates—would improve trust, support informed investment, and help track efficiency trends over time.

**Question 9**

If an energy use metric is to be displayed on Energy Performance Certificates (EPCs), which type of energy use measurement should be used to calculate this metric? Please select one option for each building type.

**Domestic buildings**

- No preference
- Don't know
- Delivered energy
- Primary energy
- Other (please specify)

**Non-domestic buildings**

- No preference
- Don't know
- Delivered energy

- Primary energy
- Other (please specify)

If you wish, please explain your reasoning and provide any evidence to support your view.

- Domestic: Delivered energy measures the actual energy a building consumes, making it the most relevant metric for assessing efficiency and environmental impact. Unlike primary energy, which accounts for upstream losses, delivered energy directly reflects a building's performance and real energy savings from retrofits. Focusing on delivered energy allows for accurate comparisons, better-targeted financial products like green mortgages, and ensures alignment with the Net Zero Carbon Building Standard.

- Non-domestic: As use cases for non-domestic buildings are so varied, delivered energy can differ greatly depending on the activities carried out within a building. Primary energy use provides a more comparable measure of the predicted energy use of the building itself.

**Question 10**

To what extent do you agree or disagree that information from a carbon-based metric should be displayed on EPCs? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- Domestic: A carbon metric should be a headline feature of building performance metrics, as it directly supports the goal of decarbonisation, which is vital for

reducing 20% of the UK's emissions which come from buildings. Carbon accounting is feasible and widely used, and this metric is important for improving carbon accounting in building upgrades, addressing the current inaccuracy of using the EPC as a proxy for green finance products. A simple, easy-to-understand carbon rating should be used to track progress toward Net Zero targets (accounting for planned grid decarbonisation), incentivise low-carbon heating, and align with the Net Zero Carbon Building Standard. This could include a qualitative rating system (i.e. 'net zero', 'moderate emissions', nearly net zero' etc.) in addition to an average annual $CO_2$ footprint. Interactive features could help householders explore their carbon footprint and options for reduction. For the finance sector, accurate carbon data is essential for green loans and ESG reporting, but a consistent and transparent methodology for emissions calculations is required to ensure this metric is useful.

- Non-domestic: The continued use of the carbon-based metric for non-domestic EPCs is needed to support the transition to decarbonised buildings in operation but should be supplemented with additional information not currently available, as laid out in responses to the previous questions.

**Question 11**

To what extent do you agree or disagree with incorporating smart metering technologies, like SMETERS, into the energy performance assessment framework for buildings? Please select one option for each building type.

**Domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Non-domestic buildings**

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- Domestic: Incorporating smart meter data into EPCs could improve their accuracy, reliability, and trustworthiness, addressing the performance gap between

predicted and real-world energy use. While less suited for building interventions like grants and standards, in-use metrics would offer meaningful insights for building inhabitants. This would focus on occupants' energy consumption behaviour and improve the ability of financial institutions to fund properties, potentially rewarding optimal use or supporting financial products based on energy savings. It could also help identify areas with high levels of under-heating or fuel poverty, enabling priority support. We support The National Retrofit Hub's proposal for a confidence rating for properties where performance is estimated rather than actually measured (i.e. high-confidence EPCs incorporating real-world data) – this would provide the incentive to test and improve data quality.

- Non-domestic: This is an important tool for non-domestic buildings as it can help landlords and tenants better understand the opportunities for efficiency gains and pave the way for green leases and even in-use performance reporting, for example via the NABERS scheme.

**Question 12**

Do you have any views on key transition issues?

- During the transition, it is crucial to ensure continuity between old and new metrics, with clear transition periods for policies and schemes. Consumer research and testing are essential, particularly for metrics like smart technology where awareness is low. Effective communication about how metrics will be used and the continued role of EPCs in measuring affordability is needed. Concerns about assessors managing multiple metrics can be addressed through retraining and upskilling. Clear guidance is necessary for older EPCs to ensure fairness and encourage improvements in energy performance.

- The EPC should evolve to a more dynamic system, with metrics changing to reflect technological changes and consumer behaviour to best encourage innovation and the adoption of high-impact solutions. Updates to data inputs should dynamically affect ratings while maintaining stability. We suggest that a public or professional body should oversee this process, reviewing evidence continuously. With retrofit activity needing to scale quickly across the UK, now is the right time for change.

## 2. When energy certificates are required (EPCs and DECs)

**Question 13**

What should be the validity period for Energy Performance Certificate (EPC) ratings?

- Don't know
- Less than 2 years
- 2 years
- 5 years [NRH agree]

- 7 years
- 10 years

- Shortening the validity period won't necessarily boost the number of EPCs as most owner-occupiers stay in their homes long-term so this would primarily affect rental properties. There are concerns regarding increased costs for consumers and reduced coverage of valid EPCs if more frequent reassessments are required, as well as the capacity of the EPC assessor market to keep up with additional demand. These concerns should be addressed if the validity period is shortened.
- However, while shorter validity might encourage retrofit works, it won't address deeper barriers to upgrading homes. A more flexible, data-driven system that maintains EPCs while allowing updates when improvements occur would be a better solution - moving away from a fixed period towards a dynamic system that can be updated when improvements, such as insulation or heat pumps, are made.

**Question 14**

To what extent do you agree or disagree with the approach for any changes to validity periods to only apply to new EPCs?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- A flexible approach to EPC validity could improve both accuracy and coverage. A validated EPC (from an in-person assessment) could be required for high-stakes situations like property sales or financial products, while provisional ratings could be available sooner to improve engagement. A two-year transition period retaining current validity rules would help balance accuracy improvements whilst minimising disruption. Instead of simply shortening validity to five years, introducing trigger points (such as after major building works) could ensure updates reflect real changes. However, too many trigger points could discourage upgrades.
- As above, an EPC system which is more dynamic and allows for ongoing updates to existing EPCs, rather than full reassessments, would streamline the process and align with government proposals on using existing EPC data.

**Question 15**

To what extent do you agree or disagree that a new EPC should be required when an existing one expires for private rented buildings?

- Strongly disagree

- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- Regularly updating EPCs would ensure that a property's energy performance accurately reflects any improvements or building work, aiding informed decision-making for landlords and tenants. This would help private rented properties meet energy standards while enabling tenants to engage with energy efficiency schemes and better manage their energy use throughout their tenancy. More frequent updates would also improve data accuracy for banks assessing risk in buy-to-let loans and property portfolios. However, the process must remain simple and affordable to avoid placing undue burdens on landlords and tenants, particularly in lower-income areas.

**Question 16**

To what extent do you agree or disagree that the regulations should be amended so that a property must have a valid EPC before it is marketed for sale or rent?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- The EPC market is mature enough to support this change, and this would allow buyers to make more informed decisions. This is the current arrangement in Scotland and it has been working well. For new build properties we suggest updating the Predicted Energy Assessment (PEA) to contain the same information as the EPC so it can be used to inform the purchase of a home.

**Question 17**

To what extent do you agree or disagree that houses in multiple occupation (HMOs) which don't already fall under the (Minimum Energy Efficiency Standards) MEES should do so when a room is rented out?

- Strongly disagree

- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- HMOs are often in poorer condition than other housing in the same area, typically being older properties with solid walls, low insulation, and costly electric heating (Future Climate, 2015). Requiring an EPC for HMOs would improve transparency for tenants and enable the government to extend Minimum Energy Efficiency Standards to this sector, ensuring better living conditions for those with limited rental options. For landlords covering energy bills, EPCs would offer guidance on cost-saving improvements.

**Question 18**

To what extent do you agree or disagree that there should be a transitional period of 24 months to allow HMO landlords to obtain a valid EPC and comply with MEES regulations?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- Current MEES regulations require rental properties to have at least an EPC E rating unless exempt, a standard that most homes already meet, with 97% of homes rated EPC E or above[1]. Given this, landlords should easily be able to implement the necessary improvements within 24 months, or even quicker.

**Question 19**

To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC at the point of being let?

- Strongly disagree
- Disagree
- Neither agree nor disagree

[1] English Housing Survey 2023-2024, GOV.UK

- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- This change would increase the overall number of properties with an EPC, giving a better overall picture of the state of energy efficiency across the country, better informing policy. This should not cause an excessive burden to those operating short-term lets and would also help policy makers assess the impact of, and potentially pave the way for, MEES regulation on these property types.

**Question 20**

To what extent do you agree or disagree with requiring short-term rental properties to have a valid EPC irrespective of who is responsible for meeting the energy costs?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 21**

To what extent do you agree or disagree that we should remove the exemption for landlords from obtaining an EPC for buildings officially protected as part of a designated environment or because of their architectural or historical merit?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- This change would have the positive impact of allowing tenants to understand the predicted energy consumption of a building, take informed decisions and plan accordingly. The EPC should make clear that this is a unique building, and the recommendations provided may be unsuitable for historic or traditionally constructed buildings. Implementing inappropriate measures could harm the

building's historic fabric, impact occupant health, and reduce overall performance, but there are many measures which can be taken to improve performance without practice challenges.

**Question 22**

How useful do you find Display Energy Certificates (DECs) for understanding and improving a building's energy performance?

- Not at all useful
- Somewhat not useful
- Neither not useful or useful
- Somewhat useful
- Very useful

- Display Energy Certificates have proved to be a useful tool within their limited use case, as proven by the fact that they have been voluntarily adopted by segments of the commercial property sector as an additional layer of detail beyond what's currently contained within non-domestic EPCs.

**Question 23**

Are there any limitations or challenges with the current DEC approach that reduce its effectiveness?

Please provide evidence where possible.

- We would encourage government to examine the potential of DECs as a tool for commercial property (more broadly than public buildings) in the transition to net zero carbon operational energy.

~~**Question 24**~~

~~What alternative approaches, if any, could drive energy performance improvements more effectively than DECs for public sector buildings?~~

~~Please provide evidence where possible.~~

**Question 25**

To what extent do you agree or disagree with the proposed changes to the validity periods for DECs and DEC recommendation reports?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree

- Strongly agree

**Question 26**

What would be an appropriate validity period in years for these DEC and DEC recommendation reports? Please select a validity period for each option.

**DEC 1000m² and under**

- 1 year
- 2 years
- 3 years
- 4 years
- 5 years
- 6 years
- 7 years
- More than 7 years
- Don't know

**DEC recommendation report 1000m² and under**

- 1 year
- 2 years
- 3 years
- 4 years
- 5 years
- 6 years
- 7 years
- More than 7 years
- Don't know

**DEC recommendation report over 1000m²**

- 1 year
- 2 years
- 3 years
- 4 years
- 5 years

- 6 years
- 7 years
- More than 7 years
- Don't know

If you wish, please explain your reasoning and provide any evidence to support your view.

- Reducing DEC validity periods can be part of a shift towards a more dynamic approach to ongoing assessments in public buildings. Alignment between DEC and EPC renewal requirements, where possible, would mean that a more complete picture of a building's performance is made available to asset managers.

## 3. EPC and DEC data

**Question 27**

There is a proposal to provide an exception in the regulations for certificates that have been marked as cancelled or not for issue to be removed from the Energy Performance of Buildings (EPB) Register after 2 years.

To what extent do you agree or disagree with the proposal?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 28**

To what extent do you agree or disagree with the approach to remove the option to opt-out EPCs from the EPB Register public address search?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Question 29**

To what extent do you agree or disagree with retaining the option to opt-out EPC address level content from the Open Data?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 30**

There is a proposal to remove the general prohibition on sharing data gathered under the EPB Regulations and replace it with a Secretary of State discretion about when, how and with whom to share the data.

To what extent do you agree or disagree with the proposal?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 31**

To what extent do you agree or disagree that data gathered in previous EPC assessments should be available for use in future EPC calculations for a dwelling?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Question 32**

What are your views on the approach to using existing data, while balancing accuracy and practicality?

- A balanced approach to EPC data should prioritise broad coverage and user simplicity while maintaining accuracy for critical use cases.
- To enable regular and dynamic EPC updates, existing validated data should be leveraged whenever building changes occur. Additionally, integrating EPCs with Digital Building Logbooks (DBLs) could enhance transparency and reliability. DBLs, which securely store and update building information from various sources, would help validate construction details and performance metrics, ensuring a more robust and trustworthy EPC system.

## 4. Managing energy certificate quality

**Question 33**

To what extent do you agree or disagree that Accreditation Schemes should be given more responsibility for overseeing the training of energy assessors?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

- We acknowledge that assessor fraud is a concern, especially as EPC ratings gain financial significance and their role expands. While we do not have a specific stance on addressing fraud, we have not seen a compelling argument in the consultation for placing the responsibility of energy assessor training under Accreditation Schemes.

**Question 34**

Do you have suggestions for other actions which could be taken to improve the accuracy and quality of energy assessments, or to help identify fraud in EPC assessments?

- Stronger government intervention is needed to improve the accuracy and transparency of EPCs and to detect fraud. While accreditation schemes currently operate under government-set requirements, existing auditing processes lack clarity, and available data is incomplete, making it difficult to assess improvements in accuracy. Automating assessments and reducing subjective judgment can help ensure greater consistency. Measurements to improve quality should include 'spot checks' via repeat assessments by an independent assessor and increased sanctions for inaccuracy/fraud.
- Given the increasing role of EPCs in policy and regulation, the government should enforce clear audit targets and enhance transparency. Integrating EPCs with Digital Building Logbooks would further enhance transparency, enabling continuous

updates and clearer validation of building information. This would also allow homeowners and professionals to easily review assumptions and identify inaccuracies in EPC assessments.

- Additionally, as EPCs evolve to include multiple metrics, it's important to focus on simplifying the process and minimising burdens on assessors. Assessor training will need to be updated, potentially with upskilling initiatives.

**Question 35**

To what extent do you agree or disagree with these proposals to improve compliance?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning or other ways to improve compliance and provide any evidence to support your view.

- While the consultation outlines a general approach, it lacks detailed proposals for compliance improvement. The engagement of local authorities, letting agents, and better access to data are positive steps. Introducing a 'Private Rented Sector Database,' as proposed in the Renters' Rights Bill, could improve compliance by informing landlords of their duties and helping enforcement bodies identify non-compliant properties. This database should be linked to the EPB database. Clearer responsibilities for enforcement and adequate resourcing for enforcement bodies are essential for success.

**Question 36**

To what extent do you agree or disagree that penalties should be increased?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 37**

If penalties were to increase, how much should current penalties increase by?

- Don't know
- No increase
- Inflation adjusted increase
- Doubling
- Other

If you wish, please explain your reasoning or other ways to improve compliance and provide any evidence to support your view.

- In order for fines to be effective they should be at least doubled.

**Question 38**

When should penalties be imposed for non-compliance with Energy Performance of Buildings Regulations (EPBR) requirements?

- Don't know
- At 6 months (no increase)
- At 12 months
- At 18 months
- Following more than 18 months

If you wish, please explain your reasoning and provide any evidence to support your view.

- Increasing the length of time in which fines can be imposed will allow more compliance checks to be carried out.

**Question 39**

What are your views on changing the current allocation of responsibilities for enforcing Energy Performance of Buildings Regulations (EPBR)?

- LWMAs struggle to enforce regulations due to difficulty identifying landlords. A mandatory landlord register could make this easier. An effective landlord register could also help achieve better compliance, with VAT incentives being one way to encourage landlords' participation (a similar register was introduced in Wales in 2016, but uptake among landlords has been slow).
- In addition, greater guidance should be provided for local authorities on how they can merge responsibility for compliance (as has been done in several councils already).

## 5. Strengthening the quality of air conditioning inspection reports

~~**Question 40**~~

There is a proposal for a new penalty charge fine amount of £800 for non-compliance with the requirement to have an ACIR for systems with an effective rated output over 12kW.

To what extent do you agree or disagree with the proposal?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

If you wish, please explain your reasoning and provide any evidence to support your view.

**Question 41**

To what extent do you agree or disagree with the proposal to redesign the structure of ACIRs?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Question 42**

What should be included in a redesigned report?

**Question 43**

To what extent do you agree or disagree with the proposal to add a cost metric in the assessment methodology for ACIRs?

- Strongly disagree
- Disagree
- Neither agree nor disagree
- Agree
- Strongly agree

**Question 44**

If you agree to including a cost metric, what would be the most suitable data on air conditioning system output to use in the calculation and how could it be obtained? Please comment both on data quality, suitability and likely availability.

~~**Question 45**~~

~~If you agree to including a cost metric, what would be the most suitable data on electricity prices to use in the calculation? Please comment both on data quality, suitability and likely availability.~~

## 6. Additional

~~**Question 46**~~

~~Please let us know if you have any evidence on the rate of voluntary implementation of recommendations made in EPCs.~~

~~**Question 47**~~

~~Please let us know if you have any comments on the regulatory or equalities impact assessments presented alongside this consultation, in particular, are there any impacts on groups with protected characteristics that we have not identified in the equalities impact assessment?~~

**Question 48**

Please let us know if you have any comments on the impact assessment in general, including any evidence you have on the impact of these proposed reforms.

- We are concerned about the lack of inclusion of overheating risks, given over half of UK homes currently at risk of overheating (Arup report for the Climate Change Committee, 2022). Overheating assessments currently only apply to new build, but need to be a mandatory part of EPC assessments so that appropriate improvements can be carried out to protect people from climate risks.