



The Chartered Institution of
Building Services Engineers
Registered Charity No. 278104
222 Balham High Road
London SW12 9BS
Telephone 020 8675 5211
Facsimile 020 8675 5449
www.cibse.org
Chief Executive & Secretary
Stephen Matthew

31st January 2012

Micheal Wilson
Department for Communities & Local Government
Climate Change and Sustainable Buildings
Zone 5/H10, Eland House
London
SW1E 5DU

By email to: Michael.Wilson@communities.gsi.gov.uk

Dear Mr Wilson,

RE: Making Energy Performance Certificate data publicly available

By and large we endorse the recent response made by Customer Focus in their letter to you dated 13th January '12. However, we would wish to add that:

- a) There is a significant difference between domestic, where there is a reasonable case for a presumption of privacy, and non-domestic, where we would argue for a presumption towards disclosure.
- b) In the particular case of DEC's, which relate to public buildings, the EPB Regulations are unenforceable as they conflict with the FoI Act and so the resolution of this anomaly and full access to the DEC's is overdue.
- c) On EPC's and ACIR's, we would argue for a reasonable level of disclosure for research purposes to enable analysis of data by those interested to do so.
- d) Any checks made on applicants seeking bulk access to the commercial register should be limited to reasonable and proportionate checks and any charges should be open, transparent and clearly explained, and should only cover reasonable costs to carry out the checks.
- e) Any provision for charges to access the data should be made in amended regulations and be subject to consultation, scrutiny by the RPC and Cabinet write around.
- f) Finally, we remind you that DCLG consulted on this in March 2010 when there was widespread support for wider access, but the previous government failed to respond.

CIBSE is the learned and professional body for building services engineers, with a global membership of almost 20,000 people, over two thirds of whom work in the United Kingdom and will be affected by the introduction of the Green Deal. Our members work in the manufacture of products and systems that will be funded under the green deal, and in the design and installation and operation of these products and systems for the buildings that will be refurbished and improved under the Green Deal.

The Institution exists to 'support the Science, Art and Practice of building services engineering, by providing our members and the public with first class information and education services and promoting the spirit of fellowship which guides our work.' CIBSE sets standards for building services engineering in the UK and overseas, publishing the CIBSE Guide, Commissioning Codes and other guidance material recognised internationally as authoritative and setting the criteria for best practice in the provision of energy using systems in buildings.

Yours sincerely,

Dr Hywel Davies
CIBSE Technical Director