

HELPING BUSINESSES TO IMPROVE THE WAY THEY USE ENERGY

BEIS Call for Evidence

The Clean Growth Strategy (CGS), published in October 2017, committed the government to consult on a package of measures to support business to improve how productively they use energy.

This call for evidence sets out possible approaches to improving energy efficiency in business and industry by 20% by 2030, and seeks views on the level of ambition and how we plan to measure our progress. It also seeks views on the actions businesses and government could take to improve take up energy efficiency across buildings and industrial processes.

This call for evidence is open to all and we would especially encourage responses from a wide range of businesses, trade associations, financial providers and academics.

CIBSE Response

Submitted 27th September 2018

Introduction

The respondent is **The Chartered Institution of Building Services Engineers (CIBSE)**.

The Chartered Institution of Building Services Engineers is the professional body that exists to:

'support the Science, Art and Practice of building services engineering, by providing our members and the public with first class information'

CIBSE members are the engineers who design, install, operate, maintain and refurbish the energy using systems installed in buildings, including homes, and are specifically trained in the assessment of heat loss from building fabric and the design of energy using systems for the provision of heating and hot water, lighting, ventilation and cooling and small power distribution in homes. Many CIBSE members work in the public sector in general and in higher education in particular.

CIBSE has over 20,000 members, of whom around 75% operate in the UK and many of the remainder in the Gulf, Hong Kong and Australasia. Many are actively involved in the energy management of commercial buildings for larger businesses, and so this consultation is highly relevant to us and to our members.

CIBSE is the sixth largest professional engineering Institution, and along with the Institution of Structural Engineers is the largest dedicated to engineering in the built environment. Our members design, install, manufacture, maintain, manage, operate and replace all the energy using systems in buildings as well as public health systems.

As an Institution CIBSE publishes Guidance and Codes which provide best practice advice and are internationally recognised as authoritative. The CIBSE Knowledge Portal, makes our Guidance available online to all CIBSE members and is the leading systematic engineering resource for the building services sector. Over the last twenty-one months it has been accessed over 200,000 times, and is used regularly by our members to access the latest guidance material for the profession. Currently we have users in over 170 countries, demonstrating the world leading position of UK engineering expertise in this field.

www.cibse.org

CONSULTATION RESPONSE

Our views on this call for evidence are expressed in summary below. We have not responded in detail to all the individual questions as we have recently expressed in more detail our recommendations on the limits of relying on market drivers, and the need for a stronger regulatory framework and better aligned incentives for energy efficiency – see in particular our response to consultations on:

- The future framework for heat in buildings, 2018
- Building a market for energy efficiency, 2018
- Streamlined energy and carbon reporting, 2018
- Cutting energy bills and carbon emissions in the public and higher education sectors, 2017.

Note - The light industrial sector is not our area of particular expertise so we are not commenting on aspects specific to this sector.

Target

The proposed 20% improvement in energy efficiency by 2030 in the Clean Growth Strategy may be a safe assumption when considering the building and industrial sectors as a whole, as not all buildings will have been retrofitted by then; however, a much more ambitious target can and should be set on individual buildings and in the longer-term, in view of overall carbon targets and as the CCC has identified that the “policies and proposals in the Clean Growth Strategy are not sufficient to meet the fourth and fifth carbon budgets”. This is also recommended because retrofit works are disruptive, therefore the potential for energy and carbon savings should be maximized when works are done; buildings being retrofitted in the next few years need to be future-proofed and contribute to the longer-term Climate Change Act and Paris Agreement carbon saving targets.

Recommended actions

CIBSE notes and wholeheartedly supports the recent report of the Committee for Climate Change on progress in reducing emissions from the building stock. Whilst we should obviously seek as many incentives and encouragements to business to be more energy efficient, and support market mechanisms, we also need to be realistic and acknowledge that this must be underpinned by a robust regulatory regime. Compliance with Building Regulations requirements to conserve fuel and power need to be taken more seriously by all concerned, with regulatory support to complement market mechanisms and to deal with those who take a view that wasting energy is acceptable. Market mechanisms alone have not, and will not, get us where the Climate Change Act commits us to be, where the Paris Agreement commits us to be, or where the basic atmospheric and climate change science demands that we go.

The primary control on the energy efficiency of new or refurbished buildings is Building Regulation. There is a misconception that the Regulations are only made to address health and safety. However, they have always been able to address “conservation of fuel and power”, which is a long winded way of describing energy efficiency, and since the Sustainable and Secure Buildings Act have also had the scope to cover Sustainability.

We therefore wholeheartedly support the findings of international research mentioned in this consultation (§3.3) i.e. “improving the efficiency of existing buildings often requires a combination of policy interventions including **performance-based energy targets**, building energy codes and standards, **mandatory energy performance disclosure** and voluntary **standards that become mandatory** supported by **finance or other incentives**”. These very much align with recommendations we have made over the years and in the above recent consultations. We would in particular refer to our response to the Future Framework on Heat in Buildings, in which we detailed our recommendations on a whole-system and coordinated approach to energy efficiency and carbon savings.

We welcome a number of options mentioned in this consultation, such as reviewing Part L of building regulations (§3.11) and reviewing requirements for minimum Energy Performance Certificates (§3.12). We very much think regulations are an essential tool, and need tightening to drive

improvements in new and existing buildings. We look forward to these reviews and will be engaging in depth with them.

We also welcome the mention here of using the public sector to demonstrate leadership and drive innovation (§3.16-§3.21), and this aligns with recommendations we have previously made. We regret to see there are no proposals here and the action “will be set out in due course”.

In summary, we agree with a number of the options explored here but think it is time to progress from calls for evidence to more concrete proposals in order to turn these into action, as highlighted most recently by the CCC in its July 2018 report. We would be happy to continue to contribute to the work of BEIS on this issue.

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Please do not hesitate to contact us for more information on these responses.