CIBSE Response to the Scottish Government Consultation on the Heat and Energy Efficiency Technical Suitability Assessment (HEETSA)

August 2025

The Chartered Institution of Building Services Engineers (CIBSE)

CIBSE is the primary professional body and learned society for those who design, install, operate and maintain the energy using systems, both mechanical and electrical, which are used in buildings. Our members therefore have a pervasive involvement in the use of energy in buildings in the UK with a key contribution to sustainable development. Our focus is on adopting a co-ordinated approach at all stages of the life cycle of buildings, including conception, briefing, design, procurement, construction, operation, maintenance and ultimate disposal.

CIBSE is one of the leading global professional organisations for building performance related knowledge. The Institution and its members are the primary source of professional guidance for the building services sector on the design, installation and maintenance of energy efficient building services systems to deliver healthy, comfortable and effective building performance. CIBSE has been actively involved in the EPC regime for non-domestic buildings since the original Energy Performance of Buildings (EPB) Directive was adopted in 2004.

CIBSE Certification Limited is a wholly owned subsidiary of CIBSE and was formed to provide an independent certification body for the approval of personnel, specifically Low Carbon Consultants (LCCs) and Low Carbon Energy Assessors (LCEAs). LCEAs are knowledgeable practitioners who can provide Energy Performance Certificates, Display Energy Certificates and Air Conditioning Inspections. CIBSE Certification is UKAS (United Kingdom Accreditation Service) accredited and is audited regularly. **This response is submitted on behalf of the whole CIBSE Group.**

CIBSE has over 20,000 members, with around 75% operating in the UK and many of the remainder in the Gulf, Hong Kong and Australasia. 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 have international experience and knowledge of life safety requirements in many other jurisdictions.

CIBSE publishes Guidance and Codes providing best practice advice and 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. It 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.

1. Do you support the introduction of a Heat and Energy Efficiency Technical Suitability Assessment (HEETSA)?

Yes.

The introduction of HEETSA is a welcome and necessary evolution in Scotland's retrofit strategy. The current reliance on Energy Performance Certificates (EPCs) is insufficient, particularly for complex, traditional, and mixed-use buildings where a "one-size-fits-all" approach risks inappropriate measures and unintended consequences.

A HEETSA framework provides an opportunity to deliver robust, building-specific, and technically grounded assessments that support Scotland's net-zero targets while ensuring occupant safety, comfort, and long-term performance.

CIBSE also recommends that HEETSA align closely with existing Scottish Government policies and standards to avoid duplication and ensure consistency — for example:

- PAS 2035/2038
- Net Zero Public Sector Buildings Standard (NZPSBS)
- CAVLEB guide for low-carbon new builds
- Local authority retrofit frameworks and funding mechanisms

2. What are your views on the proposed scope and structure of HEETSA?

The modular approach—covering insulation, heating systems, ventilation, and optional modules for communal or traditional buildings—is well-conceived and reflects Scotland's diverse building stock. However, CIBSE recommends several refinements:

a) Integration with Existing Frameworks

- HEETSA outputs should complement EPCs rather than duplicate them, feeding data into EPC frameworks to provide richer, more actionable information.
- Alignment with NZPSBS methodologies would enable consistency across both domestic and non-domestic properties.

b) Assessor Qualifications and Accreditation

- CIBSE recommends leveraging existing professional schemes, such as the CIBSE/RIAS Certifier of Design Scheme, to ensure high-quality, competency-assured assessments.
- Ongoing CPD and adherence to relevant CIBSE Codes and Guides (e.g. TM54 Energy Modelling, TM65 Embodied Carbon, Guide F Energy Efficiency) should be embedded in training requirements.
- PAS 2035/2038

c) Whole-Life Carbon and Cost Considerations

- HEETSA should assess whole-life carbon, including upfront embodied carbon, to ensure retrofit recommendations are sustainable in the long term.
- Assessments should consider whole-life costs and prioritise aligning energy and carbon-saving measures with planned maintenance and replacement cycles, as already required under NZPSBS's Construction Intervention Strategy approach.

d) Managing Costs and Complexity

- The cost of undertaking HEETSA assessments must be carefully managed.
- Using existing certification frameworks, digital data integration, and standardised reporting will help reduce overheads while maintaining assessment quality.

3. Do you agree with the proposal that HEETSA should be government-authorised and quality-assured?

Yes.
Government authorisation and oversight are essential to ensure consistency, consumer confidence, and quality assurance. CIBSE recommends:

- Establishing a central accreditation and auditing system, drawing on models like Trustmark or MCS, while leveraging CIBSE and RIAS certification schemes.
- Requiring adherence to relevant CIBSE Guides and TM reports to ensure evidence-based assessments.
- Providing digital access to HEETSA reports for property owners, local authorities, and professionals to streamline integration with funding and planning processes.

4. What challenges do you foresee in implementing HEETSA?

a) Assessor Capacity

- A shortage of suitably qualified professionals may limit initial rollout.
- CIBSE recommends piloting HEETSA in priority areas, such as rural and traditional building zones, where EPCs are least effective, while developing training pathways via existing professional bodies.
- Policy stability and sufficient time: organisations need to be confident that the policy is here to stay, otherwise they are unlikely to invest in training

b) Cost Barriers

- Without subsidies or incentives, property owners may be discouraged from undertaking assessments.
- Linking HEETSA outputs directly to funding eligibility criteria would improve uptake.

c) Data Sharing and Digital Integration

- HEETSA outputs must be digitally compatible with EPC frameworks, grant application processes, and planning submissions.
- Integration with building logbooks and digital twin platforms would enhance long-term tracking of retrofit actions and performance.

5. Additional Comments and Suggestions

- Alignment Across Government Initiatives: HEETSA should align with NZPSBS, CAVLEB, and other Scottish Government programmes to avoid duplication and create a unified retrofit pathway.
- Digital Access and Data Sharing: Secure, centralised access to HEETSA outputs for property owners, retrofit professionals, funders, and local authorities should be prioritised.
- Integration with Construction Intervention Strategies: HEETSA should adopt an approach similar to NZPSBS, developing a timeline or plan that coordinates retrofit measures with planned maintenance cycles and capital replacement programmes.
- Industry Collaboration: CIBSE supports a collaborative delivery model, working with professional institutions, academic partners, and government to ensure robust methodologies for both operational and embodied carbon assessments.

Closing Statement

CIBSE welcomes HEETSA as a critical enabler of Scotland's transition to net zero. By integrating whole-life carbon analysis, leveraging existing accreditation frameworks, and aligning with Scottish Government strategies, HEETSA can deliver technically sound, cost-effective, and practical retrofit advice.

CIBSE stands ready to support the Scottish Government by:

- Contributing to assessor training and accreditation frameworks
- Providing technical input from CIBSE Guides, TMs, and Codes
- Supporting the integration of HEETSA into a wider national retrofit strategy