Subject: [REDACTED - Regulation 11(2)]
Date: RE: RE: NBHS and Standard 6.11 - further discussion with LABSS/SBSH [OFFICIAL]
Attachments: 24 June 2024 09:05:29
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Classification: OFFICIAL

Good morning all,

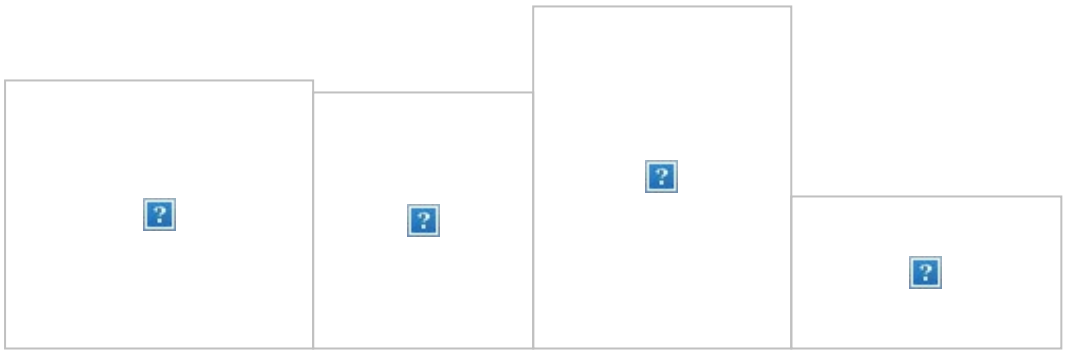
Just picking up on [REDACTED - Regulation 11(2)] summation below. I have bullet pointed the main issues with the ambiguity surrounding Technical Standard (6.11).

- As of the 1st April 2024 all Direct Heat Emitting Systems are prohibited. Why are certifiers of design still putting them into their design? I know that [REDACTED - Regulation 11(2)] was taking this as an action point to discuss with the certifiers. Clarification should be disseminated in relation to SAP 10 in regards to whether a stove can be installed or not. There is no carbon element or should be as of the 1st April 2024, however taking [REDACTED - Regulation 11(2)] point below, maybe there should be? This will depend upon the direction of travel as advised by the Minister.
- Technical Standard (6.11.2) – Emergency Heating: This needs to be clarified as to exactly what is allowable as some agents seem to think that a free standing stove is for emergency purposes. If the stove is not linked to the primary heating and hot water supply and does not meet the criteria or need for an emergency system as per to be advised. Can we accept the free standing stove as an emergency heating system? We have advised all our agents that all direct heat emitting systems are prohibited for all new buildings as of the 1st April 2024 as per the guidance, however is this going to change?
- You cannot retro fit a wood burning stove to a new building that has applied for a building warrant as of the 1st April 2024 and thus the current exemptions require to be updated to ensure that agents/applicants/contractors are aware that they cannot install a stove after the warrantable works have been completed and completion certification accepted. This will depend upon the direction of travel as intimated above.
- What criteria would need to be met in relation to the circumstances of an emergency heating system installation i.e. remote/rural/island etc.

Regards

Argyll and Bute Council
[REDACTED - Regulation 11(2)]

[redacted]yll-bute.gov.uk
w: www.argyll-bute.gov.uk



Argyll and Bute - *Realising our potential together*
cid:image016.png@01D942DA.D598B980

From: **[REDACTED - Regulation 11(2)]**

Sent: 21 June 2024 15:36

[REDACTED - Regulation 11(2)]

Good afternoon,

We have been similar to other authorities when questioned about the use of direct emission heating system and been advising that these should not be designed into new buildings.

Currently we have a Section 6 Certifier of Design, who provided a certificate for a new dwelling with a wood burning stove. This was questioned and the response was that the dwelling is in a rural location (approx. ½ mile from the nearest village), they are subject to power failures during the colder winter months and keen to have backup heating for such occasions. They feel that the use of a stove with locally sourced timber is more efficient and less polluting than a diesel or petrol generator. As a Section 6 certifier, the agent feels that he is taking responsibility for the design, takes liability and the verifier is bound to accept this (or report to the relevant certification scheme).

As raised in the meeting, a section 6 certificate of design only covers MS 6.1 to 6.10 and does not allow for the new MS 6.11, I'm assuming this is an admin error and the certs haven't been updated since the MS 6.11 was introduced on 1st April.

On other issues, I have been contacted by agents who have advised that they will design houses around a stove being installed after the completion has been accepted, carry the works out under exempt works. We are also being contacted by agents who are aware of ongoing discussions around stoves and keeping the stove within the new build design and will remove in the future if the Scottish Government don't provide the direction from the minister on the use of direct emission heating systems.

It would be useful to understand what is regarded as 'rural', my understanding was that this would cover the highlands and islands, but is new building, only a few miles out of a built-up area considered as rural?

Regards
[REDACTED - Regulation 11(2)]

Building Standards
[REDACTED - Regulation 11(2)]

Scottish Borders Council
[REDACTED - Regulation 11(2)]

scotborders.gov.uk
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How are you playing #yourpart to help us keep the Borders thriving?

[REDACTED - Regulation 11(2)]

Subject: NBHS and Standard 6.11 - further discussion with LABSS/SBSH

CAUTION: External Email

Hi all,

Thanks again for attending the meeting yesterday afternoon and for sharing your experiences. Following the meeting I got the following message from **[REDACTED - Regulation 11(2)]**

Just wanted to send a quick thank you for today's meeting – I found it really helpful. I've taken away a few actions, including sharing a draft re: proposed Direction once we have an agreement from the Minister (hopefully over the next week).

Grateful if you can forward any additional info meantime (including some stats mentioned today re: live applications discussing woodburning stoves/ using bioenergy as a main heating system). Happy to be contacted directly by anyone from the group if useful to follow up on anything.

Please forward any other relevant information, including live application numbers to Antonia, and copy me in for information.

SG colleagues CC'd for information.

Thanks

[REDACTED - Regulation 11(2)]

Scottish Building Standards Hub

Scottish Building Standards Hub

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-----Original Appointment-----

[REDACTED - Regulation 10(4)(e)]

From:	**[REDACTED - Regulation 11(2)]**
To:	
Subject:	RE: NBHS and Standard 6.11 - further discussion with LABSS/SBSH
Date:	21 June 2024 08:11:22
Attachments:	image001.png image002.png

[REDACTED - Regulation 11(2)]

See below some further feedback from The Highland Council.

The comments in red are appended to specifically represent The Highland Council position. Some elements for the SBSH to take on board as well.

- Since 1 April 2024, all verifiers within H&IC have advised applicants/agents that fixed combustion appliances are **not** permitted in new dwellings. Nobody has challenged that so far, but I expect it's just a matter of time. This is not strictly correct with regard to 'nobody has challenged that so far. It is correct that the Highland surveyors are advising applicants/agents that stove installations are no longer permitted; but we have been caveating this advice by advising the Minister has stated a review of the guidance will take place. A number of agents working in various locations throughout Highland have been particularly vocal on the recent changes (specifically Skye); a stove installer located in inverness (Bonk and Co) has been lobbying MPs/MSPs and local members; and a number of rural Highland Council Members and MSPs/MPs also angry asking for updates.
- Your email from 1 June appears to suggest that woodburning stoves are generally acceptable in new dwellings, so long as applicant/agent confirms any such appliance would only be used in an emergency. It is the intention in Highland to follow the advice stated in your e-mail of 1 June; which is supported/strengthened by the published a factsheet from Scottish Gov.
- Opinion is divided within H&IC re the extent to which we can/should rely on an email from the Hub Director when determining (potentially hundreds of) building warrant applications. One verifier seemed quite comfortable with the idea. My own view is that email in question does not have the status of guidance issued by Scottish Ministers under Section 4 of the Act. The one verifier is Highland. The Highland view is that; for by the excellent and huge range of work the SBSH are committed to doing; if we are not going to take cognisance of SBSH advice/guidance; what is the point in it being there? Isn't the fundamental purpose of the Hub to share interpretation of the standards and offer consistency?
- Scottish Government published a factsheet on 28 May. Again, opinion is divided on what to make of it. My own reading of factsheet is that Scottish Ministers introduced Standard 6.11 with the intention of all but banning woodburning stoves in new dwellings. They have now announced a review of the regulations, but until that has been completed, "the Standard remains in force." Again, the Highland view is that Scottish Government have issued a statement (the factsheet) confirming the Minister's intention of reviewing the content of 6.11; whilst confirming the Tech Standard remains in force. However, the statement does also confirms "such solutions can also be installed in new homes to provide 'emergency heating' where required".

- In the absence of clear interim guidance from BSD, I dare say most verifiers within H&IC would be reluctant to accept woodburning stoves in new dwellings unless/until the regulations are updated.

Cheers

[REDACTED - Regulation 11(2)]

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[REDACTED - Regulation 11(2)]

11 - further discussion with LABSS/SBSH

Morning, **[REDACTED - Regulation 11(2)]**

Glad you guys found the meeting useful, and we look forward the reviewing the draft direction when ready.

I will liaise with the group in terms of gathering data on numbers and any further experiences.

Cheers

[REDACTED - Regulation 11(2)]

Scottish Building Standards Hub

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Hi**[REDACTED - Regulation 11(2)]**

Just wanted to send a quick thank you for today's meeting – I found it really helpful. I've taken away a few actions, including sharing a draft re: proposed Direction once we have an agreement from the Minister (hopefully over the next week).

Grateful if you can forward any additional info meantime (including some stats mentioned today re: live applications discussing woodburning stoves/ using bioenergy as a main heating system). Happy to be contacted directly by anyone from the group if useful to follow up on anything.

Hope interviews go well/ you have a lovely weekend when it comes.

Many thanks,

[REDACTED - Regulation 11(2)]
[REDACTED - Regulation 11(2)]
Sent: Tuesday, June 18, 2024 9:54 AM

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]

Thanks [REDACTED - Regulation 11(2)] that's helpful and suggested agenda looks good.

Just as an FYI – we're providing some advice this week on options to our Minister re: an interim Direction ahead of the implementation of any review outcome. We won't be able to share the detail of this until we have Ministerial agreement but looking at the specific comments from [REDACTED - Regulation 11(2)], it will provide more clarity/ reassurance on the third point.

Many thanks,

[REDACTED - Regulation 11(2)]
Sent: Tuesday, June 18, 2024 8:25 AM
Subject: NBHS and Standard 6.11 - further discussion with LABSS/SBSH

[REDACTED - Regulation 11(2)]

See email below for background information in advance of tomorrow's meeting.

In terms of verifier attendees, see list below, this should give you some good feedback.

Scottish Borders
Argyll and Bute
Aberdeenshire
Highlands
Moray
Orkney
Shetland

I don't have a formal agenda for the session, but plan on the going through the following items.

1. Welcome and introductions
2. BSD/SG update
3. Verifier feedback
4. Specific questions from verifiers
5. Next steps

Does this sound OK with you?

Cheers

[REDACTED - Regulation 11(2)]
Scottish Building Standards Hub

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Subject: Standard 6.11

[REDACTED - Regulation 11(2)]

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Classification: OFFICIAL

[REDACTED - Regulation 11(2)]

As discussed at CTWG meeting last week, I thought I would provide an overview of the current position within H&IC re above. This can probably be summed up as follows:

- Since 1 April 2024, all verifiers within H&IC have advised applicants/agents that fixed combustion appliances are **not** permitted in new dwellings. Nobody has challenged that so far, but I expect it's just a matter of time.
- Your email from 1 June appears to suggest that woodburning stoves are generally acceptable in new dwellings, so long as applicant/agent confirms any such appliance would only be used in an emergency.
- Opinion is divided within H&IC re the extent to which we can/should rely on an email from the Hub Director when determining (potentially hundreds of) building warrant applications. One verifier seemed quite comfortable with the idea. My own view is that email in question does not have the status of guidance issued by Scottish Ministers under Section 4 of the Act.
- Scottish Government published a factsheet on 28 May. Again, opinion is divided on what to make of it. My own reading of factsheet is that Scottish Ministers introduced Standard 6.11 with the intention of all but banning woodburning stoves in new dwellings. They have now announced a review of the regulations, but until that has been completed, "the Standard remains in force."
- In the absence of clear interim guidance from BSD, I dare say most verifiers within H&IC would be reluctant to accept woodburning stoves in new dwellings unless/until the regulations are updated.

I have copied all H&IC verifiers in, who I am sure will let me know if I have misinterpreted and/or misrepresented their views!

Regards,

[REDACTED - Regulation 11(2)]

Orkney Islands Council

Your views are important to us, please take a moment to share your experience in the national customer satisfaction survey for building standards.

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[REDACTED - Regulation 11(2)]
Subject: Re: NBHS review islands workshop
Date: 06 August 2024 10:59:11

Hello,

Sharing this feedback from Fair Isle **[REDACTED - Regulation 11(2)]**who had hoped to attend the workshop, but unfortunately is unwell.

Do forward on any slides that you get from this -

Its a big issue - some points from FI perspective if there is a chance to bring it up:

- Off grid isles currently do not have the power capacity for electrical heating systems. - especially if it isnt a heatpump (storage heaters and panels will require higher KWH loads).
- You could also argue that a combination of heat pump and wood burner is a good economical and environmental way to go - (heat pump for base temperature and burner for extreme lows and as a back up).
- You could also argue that having these technologies will cause great expense due to skill shortages on the isles to maintain systems and will incur huge costs in bringing experienced contractors to the isle for maintenance.
- Buildings have poor EPC rating and are often traditional croft buildings - funding isn't available to both tenants and nts to help with energy efficiency upgrades.
- Poor EPC will also mean electric heating is more ineffective
- Additional Electric heating will be powered through backup diesel generators which are more polluting than oil boilers and especially burners.

[REDACTED - Regulation 11(2)]
South Mainland and Fair Isle
Shetland Islands Council
Community Planning and Development

[REDACTED - Regulation 11(2)]
Solarhus, 3 North Ness Business Park, Lerwick, ZE1 0LZ
https://www.shetland.gov.uk/community_planning_dev
https://www.facebook.com/shetland.community.hub

My working days are Monday – Thursday

[REDACTED - Regulation 11(2)]
Subject: RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July
Date: 12 August 2024 16:26:53

Hello **[REDACTED - Regulation 11(2)]**

I am getting in touch to confirm that the RIAS practice committee have seen sight of the paper. We don't having anything substantive to add.

The advice I received was an endorsement of option three, for all members who responded.

There was an additional comment that emergencies supply shouldn't just consider power cuts, but failure and delays in repairing or replacing an air source heat pump. Hence the preference to have a secondary heating system readily available.

Regards

[REDACTE

D -

Regulation

11(2)]

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[REDACTED - Regulation 11(2)]
Subject: RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Hello **[REDACTED - Regulation 11(2)]**

Thanks for the opportunity to attend the session yesterday. Some genuine specific concerns, but also wider frustrations being aired re urban vs rural Scotland. It was one of the more robust stakeholder sessions I have attended and hope you and colleagues have time to catch your breath.

For information here is a briefing I prepared on behalf of RIAS members for the debate in the Scottish Parliament. Which is broadly inline with the actions you are taking. Worth looking at the referenced paper on what happened in Sweden, which digs into the reaction to similar proposals.

I will consult our members and get back to you on a position in relation to the options available, and any caveats around option 3 which seemed to be the emerging front runner.

I have copied in **[REDACTED - Regulation 11(2)]**, who is a good contact if you want more technical advice on how any change might play out.

Regards

[REDACTE

D -

Regulation

11(2)]

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[REDACTED - Regulation 11(2)]

Subject: RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

[REDACTED - Regulation 11(2)]

Glad you can attend, we don't have anyone else from RIAS attending.

Best regards,
[REDACTED - Regulation 11(2)]

[REDACTED - Regulation 11(2)]

Subject: RE: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Hello

I am just picking this up on annual leave. I can attend tomorrow on behalf of RIAS, unless someone more qualified has put their name down in my absence.

[REDACTED - Regulation 11(2)]
The Royal Incorporation of Architects in Scotland

[REDACTED - Regulation 11(2)]
Subject: Scottish Government Review of the New Build Heat Standard (NBHS) - invite to workshop on 30 July

Dear Stakeholder,

Invite to participate – Scottish Government NBHS Review - Workshop (Rural focus) - Tuesday 30 July, 14:00-15:30

On 28 May the Minister for Climate Action announced a review of the New Build Heat Standard in response to the concerns raised regarding the reliance on biomass and solid fuel burning stoves in rural and remote areas. As part of this Review Scottish Government officials are holding a series of stakeholder workshops to gather evidence and views on the use of woodburning stoves, and bioenergy more widely within new buildings.

The New Build Heat Standard, as it stands, applies only to new buildings and certain types of conversions applying for a building warrant from 1 April 2024. Solid fuel burning stoves or other 'direct emission heating systems' can still be installed to provide 'emergency heating' where such a solution can be justified. However, we acknowledge that the way in which technical guidance is currently drafted on what constitutes emergency heating can be difficult to reconcile with the nature of wood burning stoves which are often installed for more frequent use, rather than solely as emergency systems.

As a key stakeholder, you are invited to attend this workshop which you can join via the link below. We will circulate a paper ahead of the workshop detailing the options officials have identified based on the review of evidence and previous responses to engagement. If you would like to send any evidence ahead of the

workshop – we would really appreciate this at 2024heatstandard@gov.scot.

I would be grateful if you could reply to this email to **confirm if you plan to attend**.

Best regards,

[REDACTED

- Regulation

11(2)]
Heat in Buildings Division
Directorate for Energy & Climate Change
Scottish Government

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REA contribution to the Scottish Government NBHS review

Evidence of our members being impacted

1) Wood Boiler Suppliers
    - "We have had no new boilers sales – restricted business to spare parts sales only".

    - "As we are a trade supplier rather than an installer, we don't physically install any of the boilers ourselves – we supply biomass boilers and the ancillary equipment, along with technical support and spares to companies across the UK."
    - "We have not sold any new biomass boilers to Scottish installer companies this year. We suspect this is due to architects advising their clients that "biomass is banned" (we have heard this specific 'slogan' quite a number of times now). There is not a useful historic trend for biomass boiler sales as the numbers have been driven by the RHI (which heavily skewed sales) and then by Covid and the Russian invasion of Ukraine which impacted pellet prices. We would have expected to have sold 20 to Scottish installers by this point in this particular year."
    - "We supply sub 100kW biomass boilers – 80% wood pellet, 15% log, 5% wood chip. I cannot advise the type of property they are being installed into, as we just supply the boilers and equipment, we do not specify the projects – but I would guess they were mainly domestic from the size of the boilers."

2) AD Heating
    - "We have lost at least 3 installations that were planned for the summer. Circa £25-30k per installation. Plus, there will obviously be no further enquiries for new builds for many years, as architects are now well versed on the new legislation and are telling their clients that "biomass is dead" – even if the regulations are relaxed, the impact of this will take a long time to reverse as people will assume that biomass is not possible going forward now, unless they are specifically told otherwise… For our company this means that this income stream is now lost – we will only be servicing existing installations, which means that the company will decline over time – hence a loss of jobs."

    - "The projects that have been shelved had not yet submitted Building Warrant – hence the issue.
    - Of the 3 that were planned and are no longer going ahead, these were two pellet boilers and one wood chip boiler – all domestic under 50kW. Two for new builds and one for a complete renovation of an old estate building into a new dwelling.
    - Most of what we install is sub-50kW domestic biomass. New boilers are 80% retrofit into older properties that are not suitable for air source heat pumps, with the remaining 20% for new builds that require more than 17kW – so again not suitable for a standard air source heat pump, or where the client does not wish to use electricity to heat their home."

Case studies

The following are examples case studies of where biomass boilers have been used in new builds in Scotland:

1) Rural New-build House (Dunster Biomass)

Project details: 20kW log boiler

What heat is used for: heating of a single new-build house

Why bioenergy is the optimal technology in this situation: The owner has access to an abundant supply of cheap, sustainable timber that is uneconomic to extract commercially. Electricity supply constraints in this rural area also precluded installation of a heat pump system

Potential carbon saved: 7.5 tonnes a year vs a modern oil boiler and still 50% saving vs an electric heat pump.

Any other benefits of the project: By installing a sophisticated log gasification boiler and accumulator tank rather than relying on wood burning stoves, both fuel consumption and emissions have been greatly reduced.

2) Non-domestic waste wood sites – the following member case studies highlight the utility of waste-wood for heating non-domestic buildings (for example, offices) that produce waste wood on their sites

(a) Timber Yard and offices (Dunster biomass)

Project details: 500kW woodchip boiler

What heat is used for: Space heating for offices and within the warehouse for worker comfort and to prevent stored material from damage (eg damp on stored plasterboard and timber).

Why bioenergy is the optimal technology in this situation: As a timber yard, the site produces a large amount of timber residue (off cuts) as part of the production process. It was the obvious choice for the client to use this material to satisfy their heating needs rather than pay to have it taken away and to buy in alternative fuel (fossil fuel or electricity). Heat pumps would struggle to provide the space heating required for the warehouse.

Potential carbon saved: >190 tonnes a year vs. modern gas boiler

Any other benefits of the project: Beneficial use for something that could otherwise be classed as 'waste' and need transporting off site.

(b) Ranheat

Supplies biomass boilers to various manufacturing/ logistics companies (saw mills, furniture manufacturers, kitchen manufacturers) that generate a significant amount of wooden packaging/waste wood on site. This can then be used on site for space heating their buildings/

offices. In Scotland specifically the example is – James Jones Forres. This saves on the CO2/diesel that would be required to transport this waste wood away.

[REDACTED - Regulation 11(2)]

Facts/figures about bioenergy in Scotland

Scotland has an established bioenergy industry across power, heat and transport. It accounted for an estimated 5,000 jobs across Scotland in 2021 and provided a market value of over £860 million to the Scottish economy. Biomass is the largest source of renewable heat in Scotland, with an estimated 3,750 GWh of output from over 8,500 installations, primarily biomass boilers (79% of all renewable heat generated in Scotland). Biomethane, produced from wastes and energy crops, is the second largest contributor to renewable heat with an estimated output of 920 GWh from 18 installations (16% of all renewable heat generated) and increased by 52 GWh between 2021 and 2022. Biofuels, like rDME, will also play a role in decarbonising hard to treat properties, especially those using oil boilers, with very low conversion costs.

In 2021 wood fuelled biomass systems were estimated to have saved 1.6 million tonnes of CO2 – making it the biggest contributor to heat decarbonisation in Scotland to date.

Biomass boilers have an important role to play in heating domestic and non-domestic properties in rural areas – especially off-gas-grid properties.

RHI data (available here) shows that:

ND RHI:

- There are 3569 non-domestic biomass boiler accreditations in Scotland.
- Of this 3018 are rural, of which 2684 are off-grid.

DRHI:

- There are 3663 domestic biomass boiler accreditations in Scotland.
- Of this 3478 are rural, of which 3200 are off-grid.

Option 3 and why we support this

Option 3: Permit the installation of all bioenergy heating (where bioenergy comes from a sustainable source) and permit the installation of all peat systems

We support the standard being amended to exclude systems operating on bioenergy, and that this should cover both domestic and non-domestic buildings. We would support this being universal as it may add additional complexity to apply limitations.

We prefer this option over 1 and 2, because it would be incredibly unlikely for biomass boilers, or hybrid bioenergy systems to be installed as an emergency or secondary system. This is because these are expensive systems and the decision to instal one is not taken lightly – therefore they will typically only be installed as the 'main system' where the customer has identified this is the most suitable option for heating their building. It would also be very hard to police 'emergency' systems and secondary heating could be opened up to fossil fuel usage.

We disagree with the current state of legislation that places bioenergy systems in the same category as fossil fuel systems as this doesn't recognise the fact that bioenergy is part of the biogenic carbon cycle. Scotland's bioenergy draft policy statement recognised this fact:

> *"Whilst combustion of biomass does produce emissions at the point of use, these emissions are part of the biogenic carbon cycle. Carbon that was absorbed from the atmosphere when the plants grew is returned when combusted, unlike fossil fuels where the carbon that has been stored underground for millions of years is released and is primarily responsible for the observed increase in atmospheric CO2 concentrations"*

And therefore, it would make sense to ensure alignment between policies. As highlighted in the workshop we would support the inclusion of 'fossil fuel' systems when describing 'direct emissions heating systems' to distinguish between them and bioenergy systems.

Any potential negative impacts can be mitigated by ensuring that regulations already in place are adhered to and policed appropriately. As highlighted in our data and research (under the Air Quality section below), with biomass boiler systems air quality is a very limited issue – all boilers registered under the RHI operate well below their permitted values, they are highly controlled, and innovations in the sector are resulting in further improvements to emissions. Negative impacts are easily mitigated with high quality fuel quality, maintenance and sustainability standards (as is currently done under the RHI). Any future legislation should consider how these high-quality standards are carried forward post-RHI support.

Other benefits of bioenergy that support legislation amendments

- **Importance of consumer choice** – right technology for the right situation. Cost of living – wood fuel is cheaper than electricity for some people. Links to the Just transition. People should be allowed to choose the most financially feasible option to decarbonise – this is particularly important for those that live in off-gas-grid and rural areas. If the costs of installing/maintaining/running a heat pump are more expensive why should consumers be forced to choose this option, when other renewable technologies are available?
- **Circular economy & forestry -** Biomass has strong links to the forestry sector and thus generates many local benefits – notably supporting a circular economy in rural areas. This is especially true for rural areas of Scotland, where local biomass resource provides highly sustainable, local feedstocks (and therefore associated limited carbon miles transporting this fuel) which support local employment, while encouraging managed forestry, leading to healthier and more productive woodlands that sequester more

carbon than unmanaged woodlands. One biomass boiler installation can support 10-15 supply chain jobs, which is particularly valuable in rural areas – Dumfries and Galloway and Highland have the highest concentrations of biomass installations and it is a valuable employer in these areas.

- **Local sustainable feedstock -** There are enough EN Plus wood pellets produced in Scotland already to fuel 60,000 homes with woodchip also being produced as a residual product to supply many more homes and businesses.
- **The grid –** there are concerns that there may be insufficient capacity in the electricity network to run heat pumps in all buildings, especially in rural areas. Indeed, there may be many areas where upgrading the electricity network would be significantly more expensive than average. Does it make sense to spend £5m reinforcing 3km of line in a rural area to serve 30 customers compared to £5m in an urban area to serve 1000 customers, where all distribution costs must be absorbed in consumer bills, potentially increasing electricity costs for all?
- **Hybrid heat-pumps** when combined with a bioenergy system provide a net-zero compatible solution – this could be particularly useful for rural homes which are located in areas that require significant grid upgrades. These could be either a transitional or long-term solution.
- **BioLPG** can also play a valuable role in decarbonising off-gas-grid properties and emit very low levels of particulates.

Research:

Element Energy developed a report on rural homes for the Scottish Government in 2020 Technical Feasibility of Low Carbon Heating in Domestic Buildings : Report for Scottish Government's Directorate for Energy & Climate Change (www.gov.scot)

- While rural properties are 5% of total in England, they are 13% in Scotland
- Scotland has 2/3 of the UK's forestry and wood pellet plants in Scotland produce between 250,000 and 300,000 tonnes of wood pellets (almost half the current UK consumption giving Scotland potential energy security into the future.
- Biomass creates 7 times more jobs than any other renewable technology because of the supply chain for fuel and servicing and most of these will be rural jobs.

Air quality

Our research: https://www.r-e-a.net/resources/whf-air-quality-leaflet/

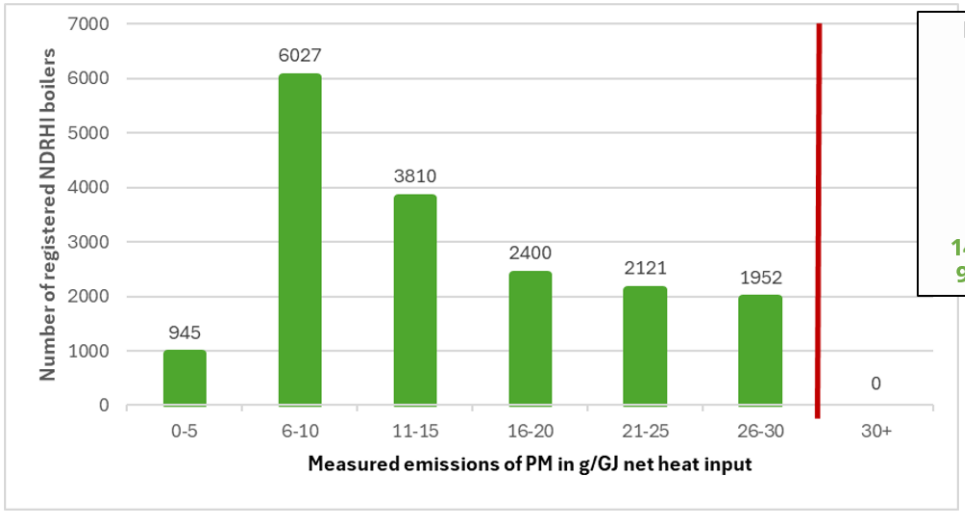
- Many modern biomass boilers have improved their particulate emissions abatement technologies – for instance, electrostatic precipitators filter out 99% of particles
- Biomass boilers have strict air quality regulations and emissions testing, regulated fuel and mandatory annual service via schemes/ rules e.g., • MCS • Environmental Permitting Programme • Industrial Emissions Directive • Clean Air Act • Large Combustion Plant

Directive • Renewable Heat Incentive (RHI) and Ecodesign certification for small scale biomass.

- All biomass boilers registered on the RHI do not exceed the legal maximum PM or NOx emissions, as per the graphs below. It should be noted that these figures are often lower in-situ and are before devices such as electrostatic precipitators are fitted.

Air Quality Graphs – PM Emissions

@reassociation



Legal required maximum PM emission:

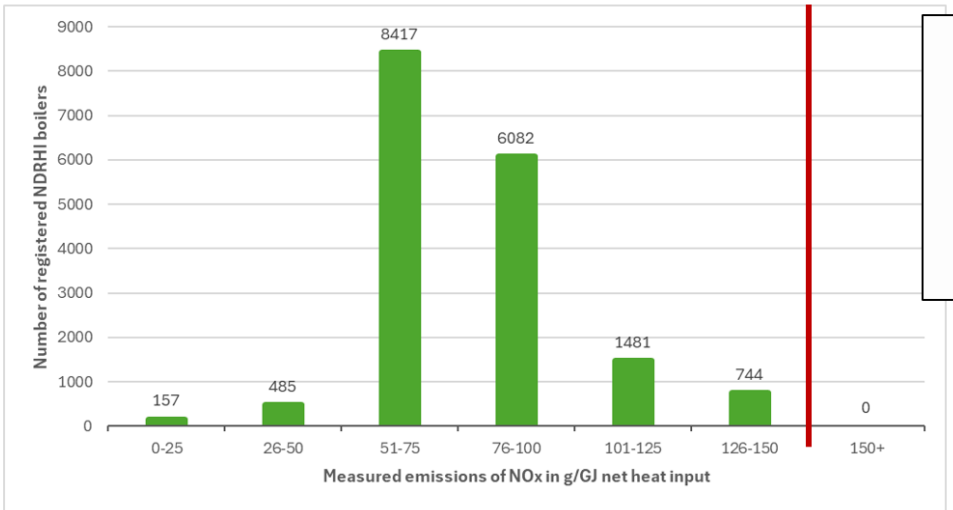
30 g/GJ

Average PM emission:
14.2 g/GJ (mean)
9.0 g/GJ (mode)

N.B This includes all ND RHI registered biomass boilers aside from those requiring environmental permits

Air Quality Graphs – NOx Emissions

@reassociation



Legal required maximum NOx emission:

150 g/GJ

Average NOx emission:
77.9 g/GJ (mean)
78 g/GJ (mode)

Survey was sent to 16 SIA member companies based in Scotland. A total of 11 responses were received (69% response rate).

Q1. Have you had to make employees redundant since the 1st April 2024 as a direct result in downturn of business due to the new legislation?

YES = 3 (27%)
NO = 6 (55%)
NO (but full impact as yet to be seen) = 1 (9%)
Not answered = 1 (9%)

If "YES" to the above, how many people has this affected?

A total of 4 FTEs have been made redundant across the 3 businesses that answered YES.

Q2. If your business uses sub-contractors (e.g. plasterers, builders, installers etc.), approximately how many are being affected by reduced business since 1st April?

2/11 respondents didn't answer
3/11 responded "NO"
6/11 said they did use sub-contractors:

- A total of 35 sub-contractors across 6 businesses have been affected
- The range in numbers was 3 to 10.

Q3. Is your income since 1st April 2024 down compared to the same period last year?

YES = 7 (64%)
NO = 3 (27%)
Not answered = 1 (9%)

If "YES" to the above, how much is income down?

Of the 7 that answered "YES" some reported the figures in percentage terms, others in monetary terms.
The average percentage decrease in income reported was 28%, with the lowest being 12.5% and the highest being 69%.
The average monetary decrease in income reported was £79k, with the lowest being £20k and the highest being £173k.

Q4. Are you holding increased stock in your business since 1st April 2024 compared to the same period last year?

YES = 4 (36%)
NO = 5 (45%)
Not answered = 2 (18%)

If "YES" to the above, what is the approximate difference in value?

Of the 4 that answered "YES" some reported the figures in percentage terms, others in monetary terms.
The average percentage increase in held stock was 20% (1 answer).
The average monetary value of increase in held stock was £46k, with the lowest being £15k and the highest being £70k

Q5. Approximately what percentage of your sales / installs / sweep visits are to new build properties, i.e. properties or extensions built in the last 5 years?

All respondents answered this question with the average being 23%. The lowest reported percentage was 5%, the highest was 50%.

Q6. Overall, has the legislation had an impact on consumers' perception of wood burning stoves?

YES = 10 (91%)
NO = 1 (9%)

If "YES" to the above, please share some further detail:

"Public perception is such that a full ban is coming."

"Main perception is confusion on what is now possible with a stove installation and anger at stoves being banned."

"The new build restriction in the Building Regs has created a public misconception that all stoves are banned or will be banned. We hear it direct at site visits. "

"Almost without exception customers/ public think it's non sensical and an infringement of choice particularly rural customers."

"We still have people coming in saying stoves are banned off the back of the Jeremy Vine show never mind the new legislation!"

"A large majority think they are banned outright – We're not even getting them into the shop to allow us to educate them on the facts. There is a fear amongst those we do speak to that stoves may be banned outright in the future and they are weighing this up when deciding to go ahead with a purchase or not."

"Many believe there is a total ban."

Q7. Any other comments you would like to make?

"This year will not be affected by the new legislation, next year will be the year when we start to see a decline in work as there will be almost no stove installs in new builds or extensions."

"There needs to be a more nuanced approach to emissions and net zero taking cognisance of the science and technology issues across all forms of heating and to take a much wider holistic approach to the challenges including home insulation, grants, overall costs and support. The other big issue is to ensure that measures are deliverable and realistic in a temporal way that allows for change and progress. Heating by a stove is by definition very low emissions. Heat generation at a commercial scale above 30kW is getting a "free pass" which is both counter intuitive and wrong. Heating is a serious issue for the population and is also related to health and well-being and freedom of choice."

"The impact of this new legislation has been immediate and deeply impacting for the industry. The confusion between carbon emissions and particulate emissions is frustrating as is the lack of a meaningful impact assessment on the stove industry before this legislation was passed.

… this legislation flies in the face of all policies on the use of wood as a renewable, low carbon & sustainable fuel. Scottish Forestry and the UK Government have spend millions of pounds promoting and subsiding biomass based on the science of wood being either low carbon or even carbon neutral. There is little or no science backing this new legislation.
The legislation appears to have been constructed in a bubble without facts, meaningful consultation and with once end goal in mind, the promotion of heat pumps above all else!"

DEPOPULATION

Eigg has 115 permanent residents. Building new houses on Eigg is a priority, as 20% of our current households live in unsuitable or temporary accommodation, including caravans, yurts, sheds and moving between winter lets. This figure was 23%, but four people have since left Eigg, citing a lack of a permanent home as the main reason, including a primary and nursery teacher, an environmental engineer, and an access technician.

Addressing depopulation takes a long time. Unexpected and inflexible standards such as NBHS make it difficult, or in Eigg's case impossible to progress with new house builds. We have been trying to build new homes for affordable rent for six years. **The new NBHS means no new private or community-led house building will happen on Eigg in the foreseeable future,** as no Zero Direct Emissions Heating Systems are compatible with Eigg Electric's generation and distribution capacity.

ACCESS TO ELECTRICITY

Eigg unit price is currently 21% higher than the UK average. This price is not set by the UK Government but by Eigg Electric and covers the cost of the maintenance team's wages and ongoing system maintenance.

Eigg Electric is around 95% renewable. We plan to expand our generation capacity to enable householders to switch to using electricity for space and water heating, cooking and car charging. This won't happen until at least 2029

Houses on the national grid can access up to 18kW at any one time

Eigg homes can have up to 5kW BUT Eigg's off-grid system needs all homes to use an average of less than 1kW at any one time to ensure there's enough power for everyone.

- ASHP for 3-bed, 100 square metre well-insulated house = 5kW
- GSHP = 4kW, but the (soft) start takes it above 5kW

Eigg Electric cannot support either an ASHP or GSHP

BUILD COSTS & MAINTENANCE

Air source heat pumps cost between £14,000 and £19,000 to install. (EST). Ground source heat pumps cost between £28,000 and £34,000 to install, depending on how you install the pipes.

Build costs on Eigg are up to 45% higher

- ASHP £20,000 and £28,000
- GSHP £40,000 and £50,000

Eigg has four ferries a week in winter and six in summer, allowing only a few hours on the island. This makes maintenance difficult and very expensive as it often involves an overnight stay.

ECONOMY AND ENVIRONMENTAL MANAGEMENT

Wood fuel business supports two jobs as part of a circular economy, which includes a third job growing trees from native seed in Eigg's tree nursery for replanting and off-island sales.

70ha of harvestable Sitka Spruce, monoculture was planted as a crop in the 1970s, is at terminal height and needs to be harvested to fulfil Eigg's Long Term Forest Plan.

Harvested 18% or 13ha to date

300% increase in wood fuel sales in the last five years

From: [REDACTED - Regulation 11(2)]
To:
Cc:
Subject: New Build Heat Standard Direction – Consultation with Verifiers- West Lothian - [OFFICIAL]
Date: 23 August 2024 09:03:42
Attachments: image001.jpg
image002.jpg
image003.jpg

DATA LABEL: OFFICIAL

Good morning,
West Lothian Council agree with the intent of this direction and have no further comment to make.
Kind regards

[REDACTED - Regulation 11(2)]
West Lothian Council
@westlothian.gov.uk

http://www.westlothian.gov.uk/building-standards
www.westlothian.gov.uk Follow us Like us Sign up

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PUBLIC: All information has been approved for public disclosure
NON-COUNCIL BUSINESS: Contains no business related or sensitive information
Link to **Information Handling Procedure**:
http://webwest1.app.westlothian.gov.uk/its/policies/itsecurity/WLC%20Information%20Handling%20Procedure.pdf
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http://www.westlothian.gov.uk

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http://www.westlothian.gov.uk

From:	**[REDACTED - Regulation 11(2)]**
To:	
Cc:	
Subject:	New Build Heat Standard Direction – Consultation with Verifiers
Date:	04 September 2024 15:36:54
Attachments:	image001.jpg

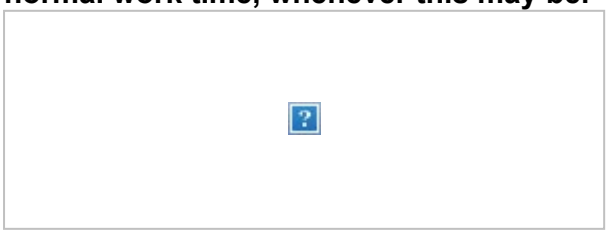
Classification: NOT PROTECTIVELY MARKED

Hi

Further to the letter dated 21st August from the Minister for Climate Action, Dr Alasdair Allan MSP, I am writing on behalf of Orkney Islands Council to confirm that we are content with the proposal as an interim measure until a revision to the technical handbooks are made in due course.
This should alleviate any concerns that were raised previously, and we appreciate the responsiveness by the Scottish Government to the issues raised.
Best wishes

[REDACTED - Regulation 11(2)]

Orkney Islands Council,
Please NOTE: I often send emails outside of normal working hours, this suits my work/life pattern and I do not expect you to read, reply or action it until your normal work time, whenever this may be.



From: [REDACTED - Regulation 11(2)]
To:
Cc:
Subject: Re: Correspondence from the Minister for Climate Action - Dr Alasdair Allan [OFFICIAL]
Date: 05 September 2024 10:09:48

Classification: OFFICIAL

Good morning

I refer to your email of 21 August 2024 attaching a letter from the Minister for Climate Change proposing legislative changes to the Building Regulations to enable applicants to install a bioenergy or peat heating system or appliance.

The use of bioenergy or peat heating systems/appliances are common in rural areas, particularly on the islands, given the high costs of alternative fuels and ready access to biofuels/peat. There are also existing social housing and other developments which use common biomass heating systems. Officials from Argyll and Bute were represented on the national building standards working group which considered the proposed amendments

The the Council welcomes the proposed relaxation(s) to the Technical Standards , rescinding the prohibition of biofuel and wood burning stoves/heating systems. The environmental impact of these heating systems is recognised and there is an opportunity for Scottish Government to consider a pragmatic approach to this issue as opposed to the initial ban.

Kind regards

[REDACTED - Regulation 11(2)]
@argyll-bute.gov.uk

From: [REDACTED - Regulation 11(2)]
Subject: Correspondence from the Minister for Climate Action - Dr Alasdair Allan
Good Afternoon,
Please find attached correspondence from the Minister for Climate Action.
Kind Regards,
[REDACTED - Regulation 11(2)]
The Scottish Government
St Andrew's House | Regent Road | Edinburgh | EH1 3DG
[REDACTED - Regulation 11(2)]@gov.scot
****

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This email has been scanned for viruses, vandals and malicious content.

From: [REDACTED - Regulation 11(2)]
To: 2024 Heat Standard
Cc: Building Standards
Subject: New Build Heat Standard Direction – Consultation with Verifiers
Date: 10 September 2024 18:29:10
Attachments: image001.jpg

Hi,
I can confirm the City of Edinburgh Council Building Standards have no comments to make in relation to the draft direction. We note colleagues in a number of local authorities and Scottish Building Standards Hub have helped with its preparation and are in agreeance with its content.
Kind regards,

[REDACTED - Regulation 11(2)]
The City of Edinburgh Council / Waverley Court, Level G:2, 4 East Market Street, Edinburgh, EH8 8BG / [REDACTED - Regulation 11(2)]@edinburgh.gov.uk / www.edinburgh.gov.uk

National Customer Satisfaction Survey

Your views are important to us, please take a moment to share your experience in the national customer satisfaction survey for building standards

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NBHS REVIEW
NOTE OF CASF2 WORKING GROUP - WORKSHOP - 31 JULY 2024

SG Attendees:
[REDACTED - Regulation 11(2)]

Stakeholders in attendance:

**[REDACTED -
Regulation 11(2)]**

Meeting Summary

Options 1 and 2 were not considered to go far enough, and there appeared to be some tentative support for Option 3. Attendees were frustrated that bioenergy was being considered in the same bracket as fuels like gas.

Regarding peat. Attendees generally felt that it was a very dirty fuel. Stove and Chimney industry representatives made the point that devices aren't tested for the burning of peat. The role it plays in fighting fuel poverty was, however, acknowledged.

Comments on Opening Remarks

[REDACTED - Regulation 11(2)] – Solid fuel briquettes, is this exception for wood burning stoves or multi fuel stoves – would products we sell be included in exception?

[REDACTED - Regulation 11(2)] – In practice there's no way to distinguish between these two stove types, bioenergy will be allowed.

Options 1 and 2 Discussion

[REDACTED - Regulation 11(2)] – Heat Pumps wont be best option in cold weather. What will fill the gap when heat pumps not the entire solution.

Pellet stove boiler is best option that is least harmful.

[REDACTED - Regulation 11(2)] – Option 1 not correct, still assumes that bioenergy system is worse because it emits carbon at point of use. Why are we still trying to prevent lowest carbon emission heating available? WBS with local fuel, why are we looking to ban this? Shouldn't we be looking at carbon emissions?

Thermostat recognises heat from wbs as much as from gas boiler.
Would prefer option 2.
If you burn wood in the home, 75/80% of energy is used in home, if being burned in power plant, 30% efficiency. Need to be smart with our resources.

Danger that form of words arbitrarily excludes form of technology. Need to be aware of implications if primary systems excluded.

[REDACTED - Regulation 11(2)] – Keen to stress Passivhaus equivalent standard coming down the line.

[REDACTED - Regulation 11(2)] – Where NBHS fails is that it includes bioenergy with gas etc. Options 1 and 2 don't address fundamental issue. If we're saying that wood and biofuel aren't low carbon that's a different discussion, but scientific evidence says that they are.

[REDACTED - Regulation 11(2)] – Passivhaus still sometimes need top up heat, WBS a good low carbon option for this.

Compared to open fire, eco-design stoves can be up to 95% less particulate matter.

Clear skies mark sets standard for WBS technologies and goes beyond Eco Design, not many sectors have made as much improvement on core technology.

Option 3 Discussion

[REDACTED - Regulation 11(2)] – Response to Q on rural distribution – We have looked at differences, but we want to make provisions that are easy to understand, urban/rural makes things more complicated.

[REDACTED - Regulation 11(2)] – Option 3 requires more detail, don't want to comment atm.

[REDACTED - Regulation 11(2)] – recognise the need for clean air. English ban on housecoal a good thing. Need to get rid of older forms of fuel. Technology for woodburners and biomass improving as it needs to.

To get rid of older polluting fuels is a good idea. Need a balance between carbon saving vs particulates.

Govt policy should point industry to doing better, if not going to ban then lets do it better. Educate the consumer. Eco Design regs being reviewed by the Danish.

[REDACTED - Regulation 11(2)] – To reiterate that industry is always improving its technology. Industry isn't passive, it's active in reducing emissions. It's part of solution rather than problem. Caps on flues for $PM_{2.5}$ and catalytic convertors on stoves.

Must not conflate mineral oils with biofuels. Oil industry in same position in terms of HVO.

Need to appreciate we're at the start of journey, not at the end.

[REDACTED - Regulation 11(2)] – Majority of new builds likely to be in urban areas where there may be existing air quality problems, where these appliances may make it worse.

Consideration of existing environment where new build properties will be.

[REDACTED - Regulation 11(2)] – Will Smoke Control Areas not be used to address geographic issues raised. Some of the tools already there.

[REDACTED - Regulation 11(2)] – Decisions not made yet regarding Clean Air Act which is being reviewed.

[REDACTED - Regulation 11(2)] – We are an industry that's in decline. What happens today will keep industry going for a few years. Solid fuel is very small part of pollution in Scotland, only used 6 months per year. Traffic pollution year round. Briquette produces less emissions than WBS.

Peat Discussion

[REDACTED - Regulation 11(2)] – peat is the most appallingly dirty fuel and its use should be kept to a minimum. Forest of Dean (Wales) also have mining rights for coal.

[REDACTED - Regulation 11(2)] – there should not be a commercial market for peat. Agree if does not fall into bioenergy category. Restrict the use of peat for cultural usage.

[REDACTED - Regulation 11(2)] – the NBHS is an opportunity to intervene to phase peat usage out.

[REDACTED - Regulation 11(2)]– HETA test reports for fuels in SCAs, don't think there is a test to quantify the smoke from peat.

[REDACTED - Regulation 11(2)] – no stoves or multi fuels tested for peat burning – discounted due to low numbers of homes using peat.

Peat is burned uncontrollably on an open fire, not in a modern stove. It is a political/ cultural decision to allow peat rather than environmental.

[REDACTED - Regulation 11(2)] - can you share these testing reports?

[REDACTED - Regulation 11(2)] – SUSTAINABLE Energy Ireland/EPA may have peat emissions data.

[REDACTED - Regulation 11(2)] – high quality modern appliances would not cope

burning peat.

[REDACTED - Regulation 11(2)] – manufacturers of stoves do not recommend

peat as a fuel in their stoves.

[REDACTED - Regulation 11(2)] – Rocardo did work on emission factors and they did look at peat. Should also consider looking at other pollutants PAH/ BAPs.

[REDACTED - Regulation 11(2)] – fuel poverty to be considered too. New builds may have electrical panels fitted which will be very expensive to run.

NBHS Review
Note of Islands Workshop – 6 August 2024

Attendee	Organisation
	SG
	SG
	SG
[REDACTED	SG
- Regulation 11(2)]	Scottish Islands Federation
	Point & Sandwick Trust
	Scottish Futures Trust
	Isle of Eigg Heritage Trust
	Tighean Innse Gall
	Fyne Homes
	Eday Partnership
	Isle of Coll Community Council
	Galson Estate Trust
	Isle of Eigg Heritage Trust

Workshop Summary

- Option 3 had the most support among attendees, with comments saying that it allows most choice. They also highlighted practices/ measures to help ensure the sustainable use of newly permitted fuels . Option 1 was considered not to go far enough, as in practice stoves are often used as the main source of heating in the winter months and often as supplementary heat rather than only in cases of interruption of the main heating system.

- Attendees were clear that key priorities in the islands should be the survival and sustainability of the local community – depopulation is something many islands struggle with; people often live in island communities because self-sufficiency is a key tenet of being

- Any review option implemented should ensure the Standard does not exacerbate fuel poverty which can be influenced bythe cost of electricity, the cost of installation and maintenance of zero emissions heating systems; the delivery of parts and costs of works is also more expensive on islands as often engineers/ tradespeople need to travel

- Higher vulnerability of the grid on islands either via the island's connection to the mainland or limitations to the local mini-grid

- Some island properties which include high specifications including clean heat are often built by wealthy owners, some moving from the mainland; this may skew statistics

- Stoves are a popular form of heating due to the easy access to fuel sources, and the comparative stability of the price of those fuels. Islanders can often

purchase several months' worth of wood or peat for a fixed fee, whereas the price of electricity can, and has, fluctuated.

- Peat was considered to be a valuable fuel source; it is often easy to access and extremely affordable; On some islands there is no woodland, and therefore logs would have to be imported which comes with increased emissions. Attendees stated that guidelines on how to cut peat in a sustainable manner would be welcomed as they recognised the impact this could have.

[REDACTED - Regulation 10(4)(e)]

NBHS REVIEW

NBHS Working Group

Meeting Note – 1 August 2024

[REDACTED – Regulation 11(2)]	SG
	SG
	SG
	SG
	SG
[REDACTED – Regulation 11(2)]	Chair
	Scottish Property Federation (SPF)
	Scottish Futures Trust (SFT)
[REDACTED – Regulation 11(2)]	Built Environment – Smarter Transformation (BE-ST)
	SGN (Scotland's gas network company)
	SSEN (Scottish and Southern Energy Networks)
[REDACTED – Regulation 11(2)]	Scottish Federation of Housing Associations (SFHA) - [REDACTED – Regulation 11(2)]
	Scottish Renewables
	Federation of Master Builders (FMB)
[REDACTED – Regulation 11(2)]	Royal Institute of Chartered Surveyors (RICS)
	Heriot-Watt University
	University of Strathclyde
	National House Building Council (NHBC)
	Homes for Scotland (HfS)
	BRE Group
	SG

Meeting Summary

[REDACTED - Regulation 10(4)(e)]

Option 2 was considered to be more sensible, but there was concern that it could open the floodgates to mass use of bioenergy and peat, and would require strong definitions. It was also stressed that the needs of rural communities would have to be considered.

Similar to the previous option, there was again concern that Option 3 could lead to a significant rise in the use of peat and bioenergy as a fuel source, but attendees were also mindful of cultural issues with relation to peat-cutting. The limitations of the electrical grid in rural areas was also acknowledged as a relevant factor.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]

- Scot Gov consultation had discussions around biomass as route to net zero, similarities to proposal to existing building. Is bioenergy to be sustainable? We're possibly looking at Option 2. Role of bioenergy needs to dovetail with existing Scot Gov proposals.

[REDACTED - Regulation 11(2)]– Secondary heating comes into force when primary one fails. Primary fails when no electricity. In cold, rural environments they will use gas heater or wood burner. Rules and regs need to enable that from emergency point of view.

[REDACTED - Regulation 11(2)] - Option 2 wider than that, not just emergencies. Some people like ambience of WBS, local economy benefits. Scope is quite different between options.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]

Option 1 not practical. Difficult to regulate. [REDACTED - Regulation 11(2)]point about practicalities interesting. Is the ambience argument a good one? Can install WBS in Edinburgh which is crazy.

What is manageable in rural areas in terms of carbon? Local peat or imported wood are options.

[REDACTED - Regulation 11(2)]

Media coverage reported as outright ban on WBS in existing homes. Option 1 unworkable. Use in rural areas understandable. Cultural needs cannot be discounted. Urban centres should be prevented from using WBS/bioenergy.

[REDACTED - Regulation 11(2)]

– Need to find workable solution which makes people feel comfortable by having secondary system. Need people to be onside. Lot of discussion of technicalities without customer awareness. Consider hybrids as a work around solution so people are confident having both available ie low carbon/FF hybrid.

[REDACTED - Regulation 11(2)]Option 3 would permit Hybrid heat pump and bioenergy system.

[REDACTED - Regulation 11(2)]

Heat Pumps can be quite inefficient when pushed too hard. Would advise people heating homes in rural areas to have heat pump with wbs to provide top up heat.

Option 3 Discussion

[REDACTED - Regulation 11(2)]

– Does seem like major difference from original ethos of NBHS. Is there mechanism to discuss sustainability of biomass?

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]

Tempting to think of Option 3 in terms of current new builds. But what happens in new builds when biomass is an option, when gas isn't? Could it lead to an increase? We'd want to guard against this. Dangerous backdoor to leave open. Could become attractive fuel for new build heat. Wouldn't support option 3 for that reason.

[REDACTED - Regulation 11(2)] Principle of trying to electrify where we can is good for new builds.
However, we are introducing biomethane into the gas grid from genuine waste arisings from AD, new builds in an area where biomethane in the grid should be allowed to use this.

[REDACTED - Regulation 11(2)] Would need a date attached to it. Rural fuel

poverty is huge. Correlation between electricity and fuel poverty. Grid resilience

issues. Needs to be other solutions for rural areas beyond heat pumps and heat networks.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]

– Knoydart Peninsula and Isle of Canna, almost impossible to have every house on heat pump. Grid limitations. Need means of using alternative fuel source.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]

peat is mainly used as a secondary heat system in multi-fuel stoves. Crofters have rights in other legislation.

[REDACTED - Regulation 10(4)(e)]

NBHS REVIEW
NOTE OF RURAL WORKSHOP - 30 JULY 2024

SG Attendees:
[REDACTED - Regulation 11(2)]

Stakeholders in attendance:

UKIFDA	
OFTEC	**[REDACTED - Regulation 11(2)]**
Scottish Land and Estates	
Highland Fuels	
AMP Clean Energy	**[REDACTED - Regulation 11(2)]**
Land Energy	
S&K MacDonald Homes Ltd	
Royal Incorporation of Architects in Scotland	
Crofting Commission	
SNIPEF	
Woodland Croft Partnership	**[REDACTED - Regulation 11(2)]**
REA	

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] – Concern with both of these options is that it doesn't recognise difference between biogenic carbon and other. Bioenergy is separate to fossil systems. Concerns about how option 1 would be policed, not sure it would achieve outcome. Option 2 at risk of being opened up to secondary fossil heating, may not meet policy objective.

[REDACTED - Regulation 11(2)] – Agree with [REDACTED - Regulation 11(2)]. Need to consider how people use their heating system in rural Scotland, also used for hot water and cooking food. Options 1 and 2 push people to spend more money. Think about definition of DEH, if defined by
'Emergency Heating using fossil fuels' it could be helpful, already a legislative definition for fossil fuels in Energy Act which excludes bioenergy.

[REDACTED - Regulation 11(2)]– Need to think about proportionality, if buildings built to building standards, then emissions and use of wbs will be considerably less. Wonder how much research has been done on this. Will use more in emergency circumstances, but less in ordinary circumstances. Has research been done on use in new v old buildings.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] – Resilience is important, but resilience based on complicated technology is an oxymoron. To put all eggs in heat pump basket could cause delays due to potential supply chain issues. WBS much more simple and easier to repair. Discussion of emergency heating should be much more focused on wider lens.

Govt agenda to increase forestry – what would we do with the forestry managed thinnings if we cannot use for heat? Export sales to England where it will be burned anyway.

Banning biomass completely is short sighted **REDACTED - Regulation 11(2)]** – Option to specify biomass stove may be good option is some areas

As emergency heating, rarely used equipment may not be suitable or

unsafe e.g. portable gas appliances that are stored away and not regularly maintained (Carbon monoxide issue)

- Safety concerns over gas portable heaters, not good with children and pets. Difficult to source.
- Option 2, would be good for exemption if local biomass available. Biomass system normally put in when options are limited.

[REDACTED - Regulation 11(2)] – Highland Council recommend that homeowners set themselves up to be resilient for 72 hours.

[REDACTED - Regulation 10(4)(e)]

Reiterates earlier point about isolating DEH definition to fossil fuels. Could also be role for hybrids, which gets around the emergency heat issue.

Very supportive of option 3 for New Builds and existing properties.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] – WBS may be best option is some areas. Existing standards in place for sustainability of biomass systems. Scot Gov could look at those standards again. As well as standards around maintenance of biomass systems, skilled installers etc as this would minimise impacts on Air Quality if system is burning as efficiently as possible.

[REDACTED - Regulation 11(2)] – Issue with policy being focused on point of use is that products of forestry management will be transported elsewhere to be burned.

Diesel generators use diesel, and you would need a lot of it during powercut, electric generator would need recharged, problematic in powercut.

[REDACTED - Regulation 11(2)] – already guidance on when biomass can be consented by Scottish Gov [*think this is in relation to biomass elec generation via s36 consents*]

[REDACTED - Regulation 11(2)] – Could restrict where we want to allow biomass. Emissions at source is strange choice, short-sighted.
Need to find a way to allow people to be self-sufficient.

[REDACTED - Regulation 11(2)] – Flies in face of promotion of woodland crofts by Scot Gov. Sledgehammer to crack a nut. Main issue is to get people off of mains gas before targeting rural areas. Too soon as electricity grid is not ready. Should be exemptions for rural areas as we are looking at ways to prevent rural depopulation.

[REDACTED - Regulation 11(2)] – Wood pellet production, creates low carbon fuel source. Biogenic carbon different to fossil fuels. 2m tonnes recovered from forestry management which previously would have been left, putting £22m back into the local economy. Scope 1-3 Carbon audit – available to share with SG – shows 96.5% reduction in carbon emissions.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)]– Irish peat briquettes are imported and used here. Cutting peat does not affect the peatland from acting as a carbon sink. Best practice can ensure the moss is preserved.

[REDACTED - Regulation 10(4)(e)]

Comments at end

REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] – Burning biomass for electricity is a problem, but for heat can be very efficient.

[**REDACTED - Regulation 10(4)(e)].**

Local Authority Workshop – 7 August 2024

[REDACTED - Regulation 11(2)] raised concerns about the refs to 6.11, and wondered if we could make reference to permitting use of wood as biomass source more explicit

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] – would flues and chimneys be included in calcs? Or do we not look at either the stove or the flues. Further direction would be welcome.

[REDACTED - Regulation 10(4)(e)]
[REDACTED - Regulation 11(2)] – Paper references WBS throughout.

What about multifuel?

[REDACTED - Regulation 11(2)] – Problem is peat.

[REDACTED - Regulation 11(2)] – No way in practice to say what is being burned. Do you think there is a tangible way to distinguish between the two?

[REDACTED - Regulation 11(2)] – Applicants will say whatever they need in order to get warrant through.

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] , looking online, there seems to be a difference between a WBS and Multifuel stove. Probably something we'd ask for from applicant.

[REDACTED - Regulation 11(2)] – Flue is also different. Will speak to HETAS to ensure missing nothing obvious.

[REDACTED - Regulation 10(4)(e)]

– Could someone have pellet boiler as main heating source?

[REDACTED - Regulation 11(2)] – Yes

[REDACTED - Regulation 11(2)] – Could someone

fit a stove after a house is built?

[REDACTED - Regulation 10(4)(e)].

Options 1 and 2

[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] – Also option of EPC reporting presence of DEH Systems. Secondary systems would be deemed as acceptable.

[REDACTED - Regulation 10(4)(e)

[REDACTED - Regulation 11(2)] – A lot of stoves will be in rural areas, so likely to be less of an issue compared to urban areas.

[REDACTED - Regulation 11(2)] – Any system capable of meeting 30% of property has to be considered as a main heating system.

Presents Option 3

[REDACTED - Regulation 11(2)] – Could you limit installation of system based on

access to sustainable source? **[REDACTED - Regulation 10(4)(e)]**

[REDACTED - Regulation 11(2)] – Need to recognise that stove capable of burning peat can also burn other solid fuels.

[REDACTED - Regulation 10(4)(e)]
and ashpan. Multifuel generally cannot be converted to wood by removing grate and pan and burning wood on a grate is less efficient as it burns faster than on a solid bed.

NBHS Review

Renewable Energy Association (REA)

Meeting Note 1/8/24

Attendees:
[REDACTED - Regulation 11(2)], DD Policy, REA
[REDACTED - Regulation 11(2)] REA

Discussion:
[REDACTED - Regulation 11(2)] – collecting info from our members, what would be useful for SG from our members?
Option 3 proposal – fairly happy with this
Opening position, we have always felt biomass heat is a good low Carbon option for HTT off-gas grid homes. Internationally accepted guidelines that biomass is lowC / renewable tech. We understand the constraints with devolved comp and consider an amendment to caveat the use of bioenergy would be appropriate.

[REDACTED - Regulation 11(2)] – reports from members of no new biomass boiler sales, 3 installations cancelled (£25-30k). 'Biomass is dead', concerns about loss of jobs.
Case studies – biomass in new builds, not the most common type of heating but some in off gas grid /rural. Where there is non-dom waste wood on site it makes sense to use biomass boilers to heat offices.

[REDACTED - Regulation 11(2)] – would not support an urban/rural exception for biomass
[REDACTED - Regulation 11(2[REDACTED - Regulation 10(4)(e)]

[REDACTED - Regulation 11(2)] - Standards/leaflets – there are a sig amount of biomass boilers in sector that adhere to emissions and PM, all within RHI specified criteria and clean air zones, must have annual maintenance. Biomass Suppliers List, now an industry body. HETAS also, so still a role for the BSL.

[REDACTED - Regulation 11(2)] – Hybrids – no sig uptick, we have a few examples, biomass+HP is economically difficult to sell.

[REDACTED - Regulation 11(2)] – Biomethane – blending through NG or in local grids. Non-dom interesting examples.

[REDACTED - Regulation 11(2)] – Liquid Biofuels – we are supportive as these are effectively a drop in fuel.

[REDACTED - Regulation 10(4)(e)]

Meeting minutes

New Build Heat Standard Review

[REDACTED - Regulation 10(4)(e)]

Wednesday 28 August 2024

Attendees:
[REDACTED - Regulation 11(2)] – City of Edinburgh Council ([REDACTED - Regulation 11(2)]
[REDACTED - Regulation 11(2)] – Baxter Design Company
[REDACTED - Regulation 11(2)] – University of Stirling
[REDACTED - Regulation 11(2)] – City of Edinburgh Council ([REDACTED - Regulation 11(2)]
SG attendees:
Sue Kearns
[REDACTED - Regulation 11(2)]

(Notes)

[REDACTED - Regulation 10(4)(e)]In rural Aberdeenshire this would benefit his clients, there are many WBS. Consider the safety aspect if WBS were being retrofitted after the new build was complete. If this was done through the building warrant process it would ensure that proper ventilation. Many people in rural Aberdeenshire are farmers or landowners so have access to wood. For those with WBS during the cost-of-living crisis this was like free heating.

[REDACTED - Regulation 11(2)] said there is a dual responsibility within the work of the LHEES team towards Fuel Poverty and Decarbonisation. Would welcome the reduction of WBS in the City of Edinburgh but value the approval of building standards to ensure a safe installation.

[REDACTED - Regulation 11(2)] notes that her view is from the air quality perspective. WBS are not good for indoor or outdoor air quality. If WBS were not installed this would be good from the air quality perspective. [REDACTED - Regulation 10(4)(e)]. It would be interesting to establish whether some softer options could be used to ensure behaviours are turned towards the efficient use of WBS and proper burning practices (e.g. burning dry, high-quality wood).

[REDACTED - Regulation 11(2)] expressed concern about WBS in the City of Edinburgh related to air pollution and health impacts. In urban and high-density environments, WBS are a lifestyle choice not a form of emergency heating. Londan based evidence showed that use in cities were limited to weekends and evenings. There has been an increase in complaints to the LA, who are limited in their response because it is difficult to deal with the increase.

[REDACTED - Regulation 6(1)(b)]

[REDACTED - Regulation 11(2)] asked for a definition of secondary heating use and understands that the clean heating system will be the main heating system and the WBS will be used as a boost. He considers how this will work in some non-domestic settings, e.g. swimming pools where a biomass boiler will be running the entire day.

[REDACTED - Regulation 11(2)] asked for any supporting evidence to be sent in as well as suggestions on nudges that could be added to the Technical Guidance handbook.

[REDACTED - Regulation 11(2)] described three types of people, ones who are for WBS, ones against the use of WBS and those who are thinking about it. There needs to be some sort of public engagement to move thinking towards the negatives of WBS. [REDACTED - Regulation 11(2)] suggested a type of MOT (flue sweep, maintenance) for stoves that could be tied into home insurance.

[REDACTED - Regulation 11(2)] [REDACTED - Regulation 10(4)(e)]

Option 3

[REDACTED - Regulation 11(2)] understood the desire for a universal standard but asked if geographical differences had been considered.

[REDACTED - Regulation 11(2)] noted that looking at geographical differences was difficult where even in areas defined as rural there are exceptions. Postcodes had also been considered as well as mini grids.

[REDACTED - Regulation 11(2)] noted that it was difficult to find an area-based solution.

[REDACTED - Regulation 11(2)] noted that his clients were more interested in having WBS installed rather than bioethanol or a fully electric system.

[REDACTED - Regulation 11(2)] – In Edinburgh there are 600 homes not on the gas grid and they may be struggling to heat their homes. She also said there was frustration that a heat network could burn biomass, but a house could not. Heat networks must be 'green' to access funding. In Scandinavian countries HN run off biomass, but it is considered to be carbon neutral.

[REDACTED - Regulation 11(2)] on option 2, building standards departments are overstretched and WBS are not a necessity in Edinburgh.

[REDACTED - Regulation 11(2)] said there is both a demand and need for WBS in rural Aberdeenshire.

[REDACTED - Regulation 11(2)] wanted to convey again concerns on the pollution of bioenergy use and that there is no safe threshold to the cumulative impacts of its combustion.

Peat

[REDACTED - Regulation 11(2)] explained that it can be had cut or mechanically extracted, and [REDACTED - Regulation 11(2)] confirmed that such activities were currently uncontrolled.

[REDACTED - Regulation 11(2)] asserted the significant role of peatland restoration in fighting CC. Extracting peat needs to be as severly limited as possible. Community events would be an effective way to raise awareness.

[REDACTED - Regulation 11(2)] highlights the work ongoing to support the restoration of peatlands and the legal rights of crofters to cut and burn peat for their own use.

[REDACTED - Regulation 11(2)] both noted the lack of data on the efficiency of burning peat.

[REDACTED - Regulation 11(2)] wanted to make a point on communication with stakeholders with the surprise that was expressed by the stove industry when the NBHS came into force. The air quality folks were happy with the original legislation.

[REDACTED - Regulation 11(2)] described how SG are developing plans to engage via the Cleaner Air for Scotland policy. Trying to fill the gaps and public engagement on burning practices, raise awareness amongst industry to promote good practice. There is also a proposed ban on coal and high sulphur solid fuels. This is complimentary to the work on the NBHS.

[REDACTED - Regulation 11(2)] summarised as follows: Option 1 is too far, option 3 is too loose, Option 2 is the sensible and practical approach. Installation plans overseen by building control, the required quick start guide to the new build house offers the perfect opportunity to educate the occupant on the WBS best practice.

Next steps – as per slides

NBHS REVIEW

Ministerial Roundtable with Stove Industry Representatives

Meeting Note - 10 July 2024

Scottish Government Attendees

Minister for Climate Action – Dr Alasdair Allan

[REDACTED - Regulation 11(2)] – Heat in Buildings

Note of discussion

- The Minister welcomed attendees to this roundtable supporting the review of the New Build Heat Standard (NBHS) and mentioned his own experience as someone living in an island community
- The Minister highlighted that there is no blanket ban on stoves while acknowledging concerns on the new building emergency heating provision and people's need to use direct emissions heating systems outside of this
- Officials confirmed the review's timeline and implementation to be done post-recess, and an interim solution being sought in consultation with local authority verifiers and own legal colleagues
- The SIA, who represent 194 members spanning the whole of the UK, brought up the NBHS's contribution to emissions reduction which they estimate to be small, and made the case in support of woodburning stoves as a sustainable solution which can operate alongside the main system and reduce the demand on the grid
- SIA highlighted concerns on and cautioned against woodburning stoves being treated as polluting fuels under the Heat in Buildings Bill, and separately expressed disappointment in the NBHS BRIA as not being reflective of the importance of the industry for employment
- SIA members have quoted redundancies (six) and jobs under review (three) as a result of NBHS coming in force due to income reduction and misunderstanding

of the regulations with members of the public thinking there is a blanket ban on stoves

- SIA urged the Minister to temporarily suspend the NBHS during Review and asked that NBHS and Heat in Buildings Bill are amended to be more favourable to the use of wood appliances
- Three family business owners, members of the SIA, shared their experiences – both highlighted confusion by customers on whether woodburning stoves have been banned and as a result have noticed a reduction of interest and sales against the first quarter of the year
- All three businesses invest in R&D to improve the sustainability of stoves, as well as training, and promote local careers
- Attendees quoted examples of Nordic countries such as Norway using woodburning stoves to supplement heat alongside heat pumps
- Chimney sweep representatives highlighted efforts to cut emissions and promote sustainable maintenance practices on the front line which can reduce environmental impacts
- They highlighted seeing a conflation between fossil fuels and biomass, and raised that emissions should be considered in the round, including upstream ones resulting from the production of electricity
- Attendees outlined concerns on higher installation costs of clean heat potentially impacting social housing and those who are most vulnerable; this can affect home-buying affordability through passing on an increased housebuilding cost onto buyers, and potentially forcing people to use heating less
- A number of attendees highlighted concerns that woodburning stoves may be banned in the future

Note of Q&A session

- Attendees cautioned against defining an urban and rural divide which may exclude those who have access to a sustainable supply of wood and can benefit from the use of woodburning stoves to supplement their main heating system

- The Minister agreed that issues on fuel poverty are universal and not only specific to rural and island communities; The Minister was struck by the impact on industry from misleading information about a 'ban' on woodburning stoves
- The Minister and officials were clear that interim guidance will, as a minimum looking to permit secondary systems – the overall review is also looking at bioenergy more widely
- One attendee raised that if there were no new stoves there will be a massive demand for electricity and SG should be taking this into consideration
- Attendees raised challenges around the price of electricity and the need for more resilience – the Minister agreed and highlighted the push for UKG to rebalance costs
- Concerns on conflation of Heat in Buildings Bill and NBHS – officials confirmed that the approach to existing buildings is not proposed to change; this excludes secondary heating from a proposed standard on existing buildings
- Attendees highlighted differences in emissions between biofuels and fossil fuels

Dr Allan closed the session by thanking attendees for sharing personal experiences of the Standard's implementation and impact on their businesses, and reflected on the importance of clear communication for any future heat in buildings work.

ANNEX A – FULL LIST OF EXTERNAL ROUNDTABLE ATTENDEES

External Attendees

[REDACTED - Regulation 11(2)]

NBHS Review
Local Authorities Building Standards Scotland (LABSS)/ Scottish Building Standards Hub (SBSH) meeting
19 June 2024

Attendees
[REDACTED - Regulation 11(2)], BSD, SG
[REDACTED - Regulation 11(2)], HiB, SG
[REDACTED - Regulation 11(2)], HiB, SG
[REDACTED - Regulation 11(2)] – [REDACTED - Regulation 11(2)], Fife Council
[REDACTED - Regulation 11(2)] – Scottish Borders
[REDACTED - Regulation 11(2)] – Highland and Islands Council
[REDACTED - Regulation 11(2)] – Orkney Council
[REDACTED - Regulation 11(2)] – Shetland Council
[REDACTED - Regulation 11(2)] – Argyll and Bute
[REDACTED - Regulation 11(2)] – Moray Council
[REDACTED - Regulation 11(2)] – Aberdeenshire Council
[REDACTED - Regulation 11(2)] – Aberdeenshire Council

Note of meeting

- Welcome and intros
- SG gave an update on the review including considering a Direction – seeking view from Minister shortly – planned to cover secondary systems as a minimum
- SG would welcome views on both this and the review itself including No of live applications or enquiries around the use of woodburning-stoves and bioenergy systems
- Roundtable of experiences below
- Closing – SG to share draft Direction before issuing

[REDACTED - Regulation 11(2)], Scottish Borders

- Brand new dwelling in countryside, architect had approved design for sec 6 which had wood burning stove. As he was sec 6 approver he decided that it counted as emergency heating. Justification being that it was half a mile from nearest village.
- RIAS certificate at present only covers 6.1 to 6.10

Actions: - **[REDACTED - Regulation 11(2)] to follow up with certification colleagues on whether we need to update the form RIAS/ BRE certifiers**

[REDACTED - Regulation 11(2)], Highland and Islands Council
- 'adverse' reaction from homebuilders
- Majority of new builds have wood burning stoves due to interruption of electricity supply
- Most using these can source own supply of wood from fallen trees etc.

- Using factsheet as basis, they will take the view that its difficult to refuse a wbs being installed as emergency use.
- Questioned whether they should be challenging if a building planner says stove will be used in emergency
- Had much feedback from architects, from Skye in particular, that regs not suited to rural areas.

[REDACTED - Regulation 11(2)], Orkney

- Haven't had real challenges in Orkney. Handful of enquiries back in April. Made it clear that solid fuel stoves in new dwellings wouldn't be allowed.
- Had one first report in Scottish Borders that contained stove. Have informed them that it has to be reviewed.
- Electricity supply in mainland Orkney fairly reliable. Possibly may be different in outer isles.
- Odds of accepting solid fuel stove in mainland Orkney is slim to none.
- SSE investing millions in grid on isles
- Everything been okay - bit of a twitter storm but not people with existing applications or planning to put in

Actions: **Clarify level of evidence needed for any emergency heating**

[REDACTED - Regulation 11(2)], Shetland

- Steered applicants away from solid fuel stoves
- Shetland had recent 6 hour powercut. Susceptible due to overhead infrastructure. Would say people that rely on such infrastructure have good excuse.
- Concerned about emergency heating being allowed in some areas but not others. Lerwick has underground infrastructure.
- People may say what they want to get what they want on applications.
- Pleased to hear that potential way forward is to allow solid fuel as secondary heating.
- Definition of secondary heating is all about switchovers etc.
- Low numbers of apps generally discussing this
- 6.1 and 6.11 conflict - emergency heating is not excluded from 6.1. - something about calcs also

Actions: **Need to give advice on what happens under 6.1**
Do we amend the SAP conventions or via other means?

[REDACTED - Regulation 11(2)], Argyll and Bute

- Lots of timber producers in Argyll
- Cheaper to use than electricity, lots of people want to install wbs
- 'when you give people a choice, they cause problems'
- Does wbs as a secondary heating system need to be linked into primary heating and hot water.
- Houses so energy efficient that they can be heated with stove
- Rural areas susceptible to power cuts due to infrastructure

- Again points to differences across the area, warns against creating 2/3 tier system
- Not enough energy to power new houses in these some islands
- **[REDACTED - Regulation 11(2)]** agrees that its difficult to assess new builds against this standard
- **[REDACTED - Regulation 11(2)]** asks about applications for main heating systems. **[REDACTED - Regulation 11(2)]** says he's been advising that wbs cant be installed in new builds.
- 6 years before grid can be upgraded to deal with amount of energy.

[REDACTED - Regulation 11(2)], Moray

- General rule they've been following is no stoves installed at all
- Major pushback has come from stove suppliers
- They say if its too complicated then agents won't bother installing.
- 2/3 years down line how will they police when a stove goes into a house that's been built after 1st April.
- Main issue - should it appear in SAP - it shouldn't as it's not used

Actions: **[REDACTED - Regulation 11(2)] - will need to amend schedule 6.3 if we maintain a hard line**;

[REDACTED - Regulation 11(2)], Aberdeenshire

- Lots of town and village populations, but also rural. Points again to challenge between legislating for each.
- Since regs came in have allowed for stoves as emergency heating source.
- More backlash from agents than developers.
- Lots of rural areas have easy access to cheap, disposable timber.
- There is genuine reliance on wbs during power cuts. Mentions 8-10 day power cut.
- Difficult to enforce policing retrospectively.
- Suggestion that it's better to allow on building warrant so there is certainty that it meets standards, rather than self-installation down the line.

[REDACTED - Regulation 11(2)], Aberdeenshire

- Local councillor says all new builds in Sweden have wood burning stoves.
- Some people ask for multiple stoves
- Can we put a maximum capacity on the size of stove? But it will depend on property size
- Would prefer to keep it out of SAP

UKIFDA / OFTEC - NBHS REVIEW
Meeting Note: 27 June 2024

Attendees:

[REDACTED - Regulation 11(2)] - SG

[REDACTED - Regulation 11(2)] - SG

[REDACTED - Regulation 11(2)] - SG

[REDACTED - Regulation 11(2)] - UKIFDA

[REDACTED - Regulation 11(2)] – Luther Pendragon

[REDACTED - Regulation 11(2)] - OFTEC

Introductions

Update on the NBHS Review

- **[REDACTED - Regulation 11(2)]** presented a summary of the NBHS, explaining the scope of the NBHS, and the subsequent controversy regarding WBS and consequent review.
- Seeking evidence from stakeholders such as those present.
- Stakeholder engagement planned.
- Ministerial meeting with those present is planned at some point.
- Have been discussing with BSD way forward, likely to be a Direction. This would propose for bioenergy as secondary heating to bridge gap between now and review outcome.

Evidence Discussion

- **[REDACTED - Regulation 11(2)] –** We are quite clear that from rural Scotland POV – where most of our customers are – the definition of polluting systems and DEH are problematic. Part of solution should be to swap out kerosene for alternative. Current definitions would exclude those definitions.
- If we can get definition that doesn't exclude renewable liquid fuels it would be very helpful. Key definitional issue is around what would be defined rural
- Proposes exemption to allow rural communities to use bioenergy. This would allow us to decarbonise customers very quickly.
- IPCC and UK exclude renewable fuels in their definition.

- **[REDACTED - Regulation 11(2)] –** In off-grid areas would there be an opportunity to have hybrid system of heat pump and renewable liquid fuels. Madeleine asks for more info on what these would look like.

- **[REDACTED - Regulation 11(2)] –** Heat Pump/Bioenergy hybrid would be allowed as secondary system

- **[REDACTED - Regulation 11(2)] –** we had one demonstration of HBO Boiler and Heat Pump. HBO Boiler would kick in at certain temperature. Madeleine asks if it would rely on electricity. Yes, but after power cut, house can be heated very quickly with hybrid system**. [REDACTED - Regulation 11(2)] –** can there be a battery backup? Absolutely, gives example of HVO Customer in Cornwall. Can also be combined with Solar. Madeleine ask if they can send over further info.

- **[REDACTED - Regulation 11(2)]** asks if they'd like to be involved in workshops. Lorna says meeting will be scheduled with Minister once he is in place.

- **[REDACTED - Regulation 11(2)] –** Also happy to attend any workshop which would be useful.

- Will the ministerial direction go out before recess? **[REDACTED - Regulation 11(2)]:** No, recess begins today, but can go out over recess.

- **[REDACTED - Regulation 11(2)] –** Once review is complete, and if it recommends any changes, how will legislation change? **[REDACTED - Regulation 11(2)]:** Different options; two legislative vehicles. Could create own SSI, or do in line with wider HiBs proposals for existing buildings. Timeline for latter is uncertain. Once we have better steer we'll know which we can use**.**

- **[REDACTED - Regulation 11(2)]:** How much will you use from previous evidence given at other consultations? **[REDACTED - Regulation 11(2)]:** These are linked, however they ask different Qs. No option to add to previous consultations.

- **[REDACTED - Regulation 11(2)]:** Where we see the issue is definition of Direct Emission/Polluting Fuels. In our response, we make this very clear defining issue. **[REDACTED - Regulation 11(2)]:** Definition of ZDEH is devolved, so lots of discussion with Legal.

Existing HIB Work Update

- Independent analysis of consultation responses ongoing.
- **[REDACTED - Regulation 11(2)]** Are there any deadlines for this? **[REDACTED - Regulation 11(2)]:** Not sure, will check.
- **[REDACTED - Regulation 11(2)]** Is govt intention to publish this? **[REDACTED - Regulation 11(2)]**: Think we have a choice if analysis is internally or externally available. **[REDACTED - Regulation 11(2)]** Possibly more clarity when Minister settled.

AOB

[REDACTED - Regulation 11(2)]: Is meeting with Minister likely to be after recess? [REDACTED - Regulation 11(2)]: Hopefully will happen over summer.

FW: Wood Burners
Wed 30/10/2024 09:04
[REDACTED - Regulation 11(2)]

[REDACTED - Regulation 10(4)(e)]

From[REDACTED - Regulation 11(2)]
Sent: Sunday, October 27, 2024 7:30 PM
To: 2024 Heat Standard <2024HeatStandard@gov.scot>
Subject: Wood Burners

To whomever it may concern,

I am writing to express my strong support for maintaining and enforcing the ban on wood-burning stoves and fireplaces in Scotland. This issue is of great importance to me, as I believe it is crucial for protecting public health, preserving our environment, and achieving our climate goals.

I am deeply concerned about the recent Direction issued on 19 September 2024, which temporarily relaxes the requirements of the New Build Heat Standard (NBHS) to allow the installation of bioenergy or peat heating systems, including wood-burning stoves, in new domestic buildings.

Wood-burning appliances are significant sources of harmful pollutants such as particulate matter (PM2.5), nitrogen oxides, and volatile organic compounds. These pollutants can cause respiratory problems, cardiovascular diseases, and other serious health issues, especially among vulnerable populations like children and the elderly.

In places like Coyhaique in Chile, where wood burners are prevalent, high cancer rates have been observed. This highlights the severe health risks associated with wood smoke. It is alarming to think that similar health issues could arise in our communities if the use of wood burners becomes more widespread.

There is also a misconception that burning wood is sustainable because trees can be replanted. However, this logic is flawed. Trees should be planted to absorb carbon dioxide, not cut down and burned. Burning wood releases carbon dioxide and other greenhouse gases, contributing to climate change. We should be focusing on reducing emissions, not adopting practices that exacerbate the problem.

Allowing wood burners while banning cleaner options like natural gas seems counterintuitive and undermines efforts to reduce emissions. Natural gas, although not perfect, is a cleaner-burning fuel compared to wood and peat. If any form of combustion-based heating is to be permitted, it would be more logical to allow the cleanest available options.

Relaxing the NBHS requirements may incentivize more people to install wood burners, which is counterproductive to our environmental and public health objectives. It seems preposterous to encourage the adoption of one of the dirtiest forms of heating available.

Many wood burner owners do not use them correctly. They burn wet wood or chemically treated wood, releasing even more harmful pollutants. Effective enforcement of proper wood-burning practices is difficult, leading to widespread non-compliance and increased pollution.

The smoke produced by wood burners is not only a health hazard but also a nuisance. It can make neighbouring properties smell unpleasant and contaminate clothes hung outside to dry. In built-up towns and villages, it is unacceptable for residents to be exposed to such pollutants.

Places like Glasgow have smoke control areas where the use of solid fuels is restricted. This approach should be expanded nationwide to all urban and densely populated areas. All forms of burning should be banned in built-up villages and towns, and this should apply retrospectively to older houses as well.

If wood burners are deemed necessary in rural areas, strict regulations should be implemented. For example, they should only be allowed if they are at least 100 meters from neighbouring properties to minimize the impact of smoke on others.

It is concerning to see people in built-up towns and villages emitting smoke in urban areas. We are no longer in the Victorian era; people should not be allowed to pollute the air and negatively affect their neighbours' health and well-being.

In light of these concerns, I urge the Scottish Government to reinstate and enforce the ban on wood-burning stoves and peat heating systems in new and existing buildings. Promoting cleaner, more sustainable heating alternatives aligns with our climate goals and demonstrates leadership in combating climate change.

Extending smoke control regulations to all built-up areas across Scotland and implementing strict controls to prevent harmful emissions from solid fuel burning would significantly benefit public health and the environment.

I am also troubled by a potential conflict of interest that may influence policy decisions. It has come to my attention that Kate Forbes MSP's husband owns a chimney sweeping company called Firework Chimney Sweep. Given that she has expressed opposition to the ban on wood burners, this raises concerns about impartiality. It seems appropriate that she should recuse herself from discussions on this matter to avoid any appearance of a conflict of interest and maintain public trust.

Thank you for considering my views on this critical matter. I look forward to your response and hope that you will take decisive action to protect our communities and our planet.

Sincerely,

[REDACTED - Regulation 11(2)]