The Energy Performance of Buildings (Scotland) Regulations 2025

Update to the Energy Performance Certificate reform consultation: Government Response

October 2025

Scottish Government
Riaghaltas na h-Alba

Contents

1. Overview

The Scottish Government is pleased to lay the new Energy Performance of Buildings (Scotland) Regulations 2025 in the Scottish Parliament on 10 October 2025. These regulations will come into force on 31 October 2026 and be the principal vehicle to deliver the reforms to Energy Performance Certificates (EPCs) set out in the Scottish Government's January 2025 Response[1] to its 2023 consultation on EPC reform.

Energy Performance Certificates (EPCs) are a long-established feature of the property market and provide information about the energy efficiency and emissions of a building. EPCs must be provided when a building is advertised for sale or for let to a new tenant. They are also required upon completion of construction of a new building, and must be displayed by certain large non-domestic buildings. They have formed part of the domestic Home Report since 2008 and help current and prospective tenants or owners to make informed choices when moving or considering improvements to their buildings.

The Scottish Government has consulted three times on EPC reform prior to laying the new Regulations (2021[2], 2023[3] and 2025[4]). This update to the Government Response represents our final decisions on EPC reform.

Actions since issuing the January 2025 Government Response

In the period since the Government Response was published during January, the Scottish Government has:

- issued a technical consultation on reforms to EPC lodgement fees and penalty charges contained within the new Regulations
- completed its review of the current Operational Framework which specifies the requirements that Approved Organisations who accredit EPC assessors, must meet
- developed its initial versions of the new calculation methodologies for domestic and non-domestic EPCs which will be used to calculate the new ratings set out within the new Regulations
- used those initial versions of the calculation methodologies (the Home Energy Model and Simplified Building Energy Model) for domestic and non-domestic buildings, respectively, to model the likely performance of the building stock against the principal new ratings
- worked with independent building experts to consider the approach and logic by which the calculation methodologies will suggest potential improvements on the reformed EPC's new Property Report that domestic building owners could make for their building to achieve better potential ratings (improved energy efficiency, reduced emissions and lower energy costs)
- conducted further user testing with consumers of the design of the new domestic and non-domestic EPC and Property Report, to ensure that it

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1 Energy Performance Certificate reform consultation: response - gov.scot
2 Domestic Energy Performance Certificates (EPC) reform: consultation - gov.scot
3 Energy Performance Certificate (EPC) reform: consultation - gov.scot
4 Energy Performance Certificate reform – lodgement fees and penalty charges: technical consultation - gov.scot

contains the most relevant information in a form that is accessible and well-understood
- completed a series of impact assessments and considered transitional impacts for sectors impacted by the new Regulations
- completed the discovery phase of work to set the requirements for building the new digital EPC Register (working with the UK Government) and is now moving into the alpha phase of project design and build

In addition, the Scottish Government has:

- issued a scoping consultation on a proposed Heat & Energy Efficiency Technical Suitability Assessment (HEETSA)[5] as an optional step beyond the EPC, which recognises the limitations of the EPC as a basic, standardised assessment, and the potential need for a more bespoke, technical assessment of which energy efficiency and clean heat measures would, or would not be, suitable for a building (in particular those which are harder-to-decarbonise such as traditional buildings or tenements)
- consulted upon a potential minimum energy efficiency standard for the private rented sector (PRS MEES)[6] which would use the reformed domestic EPC's new Heat Retention Rating as a basis for setting the standard.

These consultations closed at the end of August 2025 and are still under analysis before Ministers take decisions on the way forward. They do not form part of the Government's updated response on EPC reform, but are an important context for the reforms we are now making to EPCs.

Updates to the Government Response

In this update to the Government Response, we set out further information to help support stakeholders and Parliament in their scrutiny of the new Regulations. This update should be read together with the initial Response issued in January. This response sets out:

- A summary of the new Regulations, including the provisions which we are retaining, and those which are new, together with transitional arrangements for when the new regulations come into force, to mitigate potential negative impacts on particular parts of the property market (Chapter 2)
- The Government Response to the Technical Consultation on Energy Performance Certificate (EPC) Reform – Lodgement Fees and Penalty Charges[7] (Chapter 3)
- The conclusions of our internal review of the current Operational Framework for Approved Organisations, and the next steps we will take to initiate a new process to appoint Approved Organisations to operate Accreditation Schemes under the new Regulations (Chapter 4)

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[5] Executive Summary - Heat and Energy Efficiency Technical Suitability Assessment (HEETSA): scoping consultation - gov.scot

[6] Draft Energy Efficiency (Domestic Private Rented Property) (Scotland) Regulations: consultation - gov.scot

[7] Supporting documents - Energy Performance Certificate reform – lodgement fees and penalty charges: technical consultation - gov.scot

- Our initial high level approach to specifying the new calculation methodologies which will be used to calculate the new EPC ratings and the logic by which they will suggest improvements on the new Property Report (Chapter 5)
- Revised bandings we intend to adopt for further more detailed modelling of the Heat Retention Rating on the new domestic EPC, following initial modelling using the new Home Energy Model. This will continue to meet our commitment that the new Band C should be as largely as possible 'equivalent' to the current EPC's SAP-based Band C (Chapter 5)
- The approach we will take to presenting information on the Heating System Rating on the new domestic EPC, which we have updated following further user testing (Chapter 5)
- Some minor changes to the naming of the ratings on the non-domestic EPC (Chapter 5).

This updated Government Response can be read alongside the Business & Regulatory Impact Assessment (BRIA) published alongside the new Regulations, which contains further information on the performance of Scotland's domestic and non-domestic buildings against the new ratings.

Next steps to support our EPC reforms ahead of the new Regulations coming into force

The Scottish Government intends to bring the new Regulations into force on 31 October 2026 – this is to give all stakeholders who are impacted, sufficient time to prepare for the changes. It also takes account of the UK Government's intention for the new Home Energy Model and new cloud calculation-based EPC Register to be ready as the basis for issuing the new EPCs by October 2026. By working to align as far as possible on the timetable for bringing new reforms into force across the UK, both governments are working to support the continued operation of the EPC assessor market, which operates across the UK and is covered by some of the provisions of the UK Internal Market Act 2020.

Subject to Parliament approving the new Regulations, the Scottish Government will, in the period between the Regulations becoming law, and coming into force:

- engage with all stakeholders in the property market directly affected by the new Regulations (estate and lettings agents, landlords, conveyancing solicitors, surveyors, EPC assessors, lenders, local authorities) and with the general public through a communications and marketing campaign to ensure they understand the changes
- finalise and publish the full calculation methodologies for generating new EPCs (including rating bandings) and Property Reports as specified in Regulation 10
- complete the final stages of user testing of the new web-based EPC and Property Report design, to ensure it meets accessibility requirements
- undertake discovery work on the technical and design requirements for an interactive digital user interface to enable consumers to input occupancy and energy tariff information to adjust the EPC's final user testing and develop user interface
- complete the design, build and testing of the new EPC Register and calculation methodologies, including working with Approved Organisations

and the UK Government to ensure that EPC assessors are trained in their use and are familiar with the new EPC and Property Report and rating systems
- during Winter 2025-2026, once the detailed requirements of new Accreditation Schemes have been approved by Ministers, notify the market of the new enhanced Operational Framework and the new AO appointment process, inviting applications from existing AOs and new entrants to operate Accreditation Schemes. Applications will be appraised and, pending Ministerial approval, new appointment letters issued during summer/autumn 2026 ahead of the Regulations coming into force.
- work with Approved Organisations, informed by discussions with the Danish Energy Agency and Sustainable Energy Authority of Ireland, to design the new onsite audit and inspection requirements of Regulation 12.

2. **Summary of retained and new / updated regulatory provisions and transitional arrangements**

The Scottish Government intends to bring the new Regulations into force on 31 October 2026. In making this change, the regulations will revoke the existing Energy Performance of Buildings (Scotland) Regulations 2008 and will replace them.

As a result, all EPCs issued under the 2008 Regulations will cease to be valid and a new EPC meeting the requirements of the 2025 Regulations will be required for all properties from October 2026 (subject to the specific transitional arrangements below).

The Scottish Government is taking this approach to ensure that all consumers will benefit from day one from the new information and rating system that they have helped to design through the extensive user testing. It also avoids the risk of confusion within the property market were there to be two different types of EPC in circulation, which would impact estate and lettings agents and conveyancing solicitors making property transactions, and upon lenders and landlords who need clarity on how they are measuring the performance of their portfolio.

There are some particular parts of the market where the new Regulations put in place transitional arrangements to mitigate day one impacts for live property transactions or ongoing display requirements when the Regulations come into force. These are outlined below and comprise:

- properties which are already advertised for sale or for let on the day on which the regulations come into force
- short term let properties which are often continually advertised
- certain large non domestic buildings (frequently visited by the public) which are required to always display a valid EPC

The Scottish Government will engage with all stakeholders in the property market directly affected by the new Regulations (estate and lettings agents, landlords, conveyancing solicitors, surveyors, EPC assessors, lenders, local authorities) and with the general public through a comms and marketing campaign to ensure they understand the changes – in particular the need to obtain a new EPC.

2.1 **Retained provisions**

The new regulations will continue to:

- require that a valid EPC exists when:
  - a new building has been constructed;
  - when a building is to be sold;
  - when a building is to be let to a new tenant
- certain large non-domestic buildings (frequently visited by the public) are required to display it
- appoint local authorities as enforcement authorities for the purpose of these regulations and for enforcement authorities to issue penalty charge notices
- allow Scottish Ministers to approve organisations that accredit energy assessors

- allow Scottish Ministers to approve EPC calculation methodologies
- require for the provision of an EPC Register
- retain EPC penalty charges at the level currently set in the 2008 Regulations

2.2 New and updated provisions

The new Regulations will introduce the following new and updated provisions:

- a new rating system for domestic buildings:
  - Heat Retention Rating (reflecting fabric energy efficiency),
  - Heating System Rating (covering type, emissions and efficiency),
  - Energy Cost Rating (an updated version of the existing Energy Efficiency Rating).
- a new rating system for non-domestic buildings:
  - Energy Performance Rating
  - Energy Use Rating
  - Direct Emissions Rating
- a new Property Report which will set out potential improvement measures that could improve the energy efficiency and lower the energy costs of the building; and which will set out information on potential alternative heating systems which could reduce emissions (and their potential installation and running costs)
- reducing the validity period of EPCs from 10 to five years to ensure consumers have more up-to-date information.
- introducing strengthened operational governance arrangements for EPC assessors and Approved Organisations through new accreditation scheme requirements (including new onsite audit and inspection requirements) to enhance quality assurance for consumers.
- amending EPC lodgement fees to £6.00 for domestic certificates and £15.50 for non-domestic certificates, to ensure that they can cover the costs of providing the technical and operational infrastructure (EPC Register, calculation methodologies, onsite audit and inspection) to support the EPC regulations and which provide benefit to consumers.
- updating the requirements on disclosure of energy performance data

2.3 Transitional provisions

During our stakeholder engagement and impact assessments accompanying the new Regulations, the Scottish Government has identified the need to mitigate potential negative impacts on particular parts of the property market. We have therefore made provisions within the new Regulations (Regulation 38) for transitional arrangements as follows:

- **Buildings for sale or let (other than short term lets)**

Regulation 5 makes provisions for a valid EPC and property report to be provided both when the building is advertised for sale or let (to prospective buyers or tenants) and when it has subsequently been sold or let (to the buyer or tenant).

We recognise that EPCs are provided as part of a live property market in which transactions will already be underway on the day on which the new Regulations come into force, or where landlords or sellers may have already commissioned and paid for EPCs in advance of advertising their property for sale or lease, or may be relying on an existing EPC in order to complete their transaction.

The Scottish Government wants to minimise the risk of any disruption to the smooth functioning of the property market and therefore Regulation 38 makes transitional arrangements which provides for up to a one year grace period for properties being sold or let.

These transitional arrangements on buildings for sale or let cover **all** existing domestic and non-domestic buildings, other than short term lets, particular large non-domestic buildings frequently visited by the public, and newly-constructed buildings (see provisions for these other types of properties, below).

The Regulations specify a one year ‘relevant period’ within which the transitional arrangements apply:

- The relevant period is, at maximum, one year, from 31 October 2026 to 31 October 2027, but ends earlier if a property is sold or let before 31 October 2027.

The transitional provisions in Regulation 38 therefore allow that:

- between 31 October 2026 and 31 October 2027, properties being sold or let may continue to use **either** valid EPCs and recommendation reports issued under the 2008 Regulations **or** valid EPCs and property reports issued under the 2025 Regulations.

But they also restrict the length of the one year transition period for properties sold or let within that one year period, in the event that they are sold or let again:

- an EPC and recommendation report issued under the 2008 Regulations may be used for the sale or let of a property after 31 October 2026, but if a property is sold or let again within the one year transition period, a new-style EPC and property report issued under the 2025 Regulations will then be required.

Regulation 38 specifies a clear backstop date for the end of the transition:

- after 31 October 2027, only the new-style EPC and property report issued under the 2025 Regulations will be allowed for sale or for let.

In practice, from 31 October 2026 onwards, when a building owner commissions a new EPC, assessors will only be able to **issue** new-style EPCs meeting the requirements of the 2025 regulations, but if an old-style EPC meeting the requirements of the 2008 regulations is still valid during the transition period, it can still be **used** until the end of the transition period, or completion of the sale or let whichever comes first (i.e. the old-style EPC can be downloaded from the EPC Register and used in a property transaction).

From 31 October 2026 to 31 October 2027, we will therefore see diminishing numbers of EPCs previously generated under the 2008 Regulations being used in property transactions. Conversely, we will see increasing numbers of EPCs issued under the 2025 Regulations. From 31 October 2027, only EPCs issued under the 2025 Regulations will be allowed.

The Scottish Government believes this represents a fair transition which will mitigate the following particular impacts:

- a potentially significant increase on day one in the number of EPCs that would be needed for properties which are continuously advertised, such as for short term lets, allowing hosts adequate time to obtain a new 2025-style EPC
- a potentially significant increase in year one in the number of EPCs that would be needed for private rented sector properties, where around 31% of the stock turns over per year, allowing landlords more time to obtain a new 2025-style EPC when advertising a new let
- day one and year one pressure on the assessor market as it adjusts to higher levels of expected demand for new certificates (outlined in the Business & Regulatory Impact Assessment which accompanies the Regulations), allowing demand to be more evenly spread across year one and two from the Regulations' 31 October 2026 in-force date

By introducing the new Regulations 12 months in advance of them coming into force, and by allowing the one year transition period for sales and lets after they come into force, the Scottish Government believes that it is giving sufficient time for property market actors to adjust to the new requirements. We will engage with all stakeholders in the property market and with the general public through a communications and marketing campaign to ensure they understand the changes. The one year transitional period will allow more time for the new rating system and redesigned certificate to become embedded and understood within the market before it is required for every property transaction.

- **Short term lets**

We recognise that short term lets are normally continuously advertised and therefore on day one of the new regulations, it would not be possible for all hosts to immediately obtain a new-style EPC issued under the 2025 Regulations. Short term let properties will therefore have a full one year grace period in which to obtain a new-style EPC. This means that:

- between 31 October 2026 and 31 October 2027, short term let properties may continue to use **either** valid EPCs and recommendation reports issued under the 2008 Regulations **or** valid EPCs and property reports issued under the 2025 Regulations.
- after 31 October 2027, only the new-style EPC and property report issued under the 2025 Regulations will be allowed for the letting of a building as a short term let.

As outlined in the BRIA accompanying the regulations, this grace period allows the sector to have a more evenly-spaced transition to the new-style EPC for Scotland's approximately 30,000 short term lets, which should minimise any potential disruption to the market.

- **Large non-domestic buildings (frequently visited by the public)**

Regulation 13 makes provision that certain large non-domestic buildings which are frequently visited by members of the public must always display a valid EPC in a prominent place that is clearly visible to visiting members of the public.

The Scottish Government recognises the need to mitigate the risk that on day one, several thousand large buildings would immediately require a new EPC. Given the significantly higher costs of preparing an EPC for these more complex non-domestic buildings, and the smaller numbers of active non-domestic assessors available within the market, we do not believe that it would be possible to issue new EPCs at a rate beyond current market capacity.

Regulation 38 therefore makes provision that buildings which are affected by the requirements of Regulation 13 can continue to use the old-style EPC they currently display under the 2008 Regulations until the end of its validity period, or until 31 October 2031.

This means that if the validity of an EPC issued under the 2008 Regulations expires before 31 October 2031, it will be required to use a new-style EPC. After 31 October 2031, all building owners or occupiers covered by Regulation 13 will need to obtain and display a new-style EPC meeting the requirements of the 2025 Regulations.

By allowing this five year grace period, the Scottish Government believes that this will help to smooth the transition for these large and often complex non-domestic buildings to obtain a new EPC.

As with other parts of the property market, the Scottish Government will engage with building owners and occupants covered by Regulation 13 to ensure that they understand the requirement to have a new EPC before the new Regulations come into force.

- **New construction**

Regulation 6 sets out the requirement for EPCs to be provided upon construction of a new property. This replaces the existing requirements in standard 6.9 of Schedule 5 of the Building (Scotland) Regulations 2004, and brings all legal requirements for the provision of EPCs into one set of regulations. Developers of new buildings completed on or after 31 October 2026 will be required to give a copy of a valid EPC and property report that meets the requirements of the 2025 Regulations to the owner of the building within seven days of submitting a completion certificate to a local authority verifier. As with other parts of the property market, the Scottish Government will engage with developers of new buildings and with local authorities to ensure that they understand the new requirements of Regulation 6 before the new Regulations come into force.

Communicating the transitional arrangements

We will develop further guidance as part of the communications and marketing campaign which we will deliver to engage affected stakeholders ahead of the regulations coming into force in October 2026, to ensure that all property market actors and the general public understand how the regulations will apply to their type of property.

3. Government Response to the Technical Consultation on Energy Performance Certificate (EPC) Reform – Lodgement Fees and Penalty Charges[8]

3.1 EPC Lodgement Fees and Penalty Charges

We sought views on the future funding of key elements of Scotland's Energy Performance Certificate (EPC) regulatory regime, and on the level of penalty charges in a technical consultation from February to March 2025. The purpose of this consultation was to seek views on a number of key areas relating to the increase in the statutory fee levied on the lodgement of domestic and non-domestic EPCs in Scotland. Questions related to the proposed increase amount (£), the frequency of reviews, and potential changes relating to penalty charges under the new EPC regulations.

We proposed that EPC lodgement fees would be increased by £3.40, raising the cost of lodging a domestic EPC to £6.00 and a non-domestic EPC to £15.50. We set out that we believed this was a proportionate increase that ensured lodgement fees in Scotland remained within the same range of similar small EU countries.

We set out that when moving to the new EPC regulations, we would need to build a new technical and operational infrastructure to replace current systems which are now life-expired. We showed how we propose to work with the UK Government to maximise sharing of this infrastructure to help to reduce the upfront capital costs and ongoing running costs and to continue to maintain market access to EPC assessors operating across the UK, as required by some of the provisions of the UK Internal Market Act 2020. This has resulted in fee increases which are lower than they would otherwise be.

We proposed that the lodgement fees would be used to support the development of the following elements of operational and technical infrastructure:

- a new EPC Register where certificates can be lodged and made available to prospective property purchasers and tenants;
- a new EPC Calculation Methodology to allow the new EPC ratings and potential improvements to properties to be calculated by assessors using the new UK Home Energy Model
- a new onsite audit and inspection function to ensure EPCs are accurate and reliable and to allow Scotland to maintain alignment with changes that the EU has made to EPCs through revisions to the Energy of Performance of Buildings Directive in 2024. This would represent a significant step forward in enhancing audit mechanisms to improve the overall quality of EPC assessments undertaken, while also building consumer confidence and supporting potential future mandatory standards around energy efficiency.

We did not propose to make changes to current levels of penalty charges, (which are £500 for domestic properties and £1,000 for non-domestic properties), but sought views on whether or not these remained appropriate.

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[8] Supporting documents - Energy Performance Certificate reform – lodgement fees and penalty charges: technical consultation - gov.scot

We proposed to review lodgement fee levels, the onsite audit and inspection function, and penalty charge levels, within two years of the regulations coming into force.

As part of the consultation process we held three, two-hour long, online workshops. These provided an opportunity for stakeholders to engage directly with us. A total of 46 individuals attended these workshops.

3.2 Summary of Consultation Responses

In total, 29 written responses were received to the technical consultation on EPC lodgement fees and penalty charges. We have published the responses received on our consultation platform[9] where the respondent has given permission for us to do so.

The table below provides a breakdown of responses by respondent type:

Respondent profile	Number	Percent
All Individuals	**13**	**45%**
Individuals	8	28%
Individuals - sector specific professional background	5	17%
All Organisations	**16**	**55%**
Approved Organisations (AO)	2	7%
Built Environment Focused Organisations	5	17%
Energy Focused Organisations	3	10%
Real Estate Focused Organisations	3	10%
Local Authorities*	3	10%
Total	**29**	**~100%**

Table 1: Respondent Profile - Written Responses

* The local authorities included one mainland authority, one rural mainland authority, and one island authority.
Note: this table does not add up to 100% due to rounding.

In addition to the written responses, 46 organisations participated in the consultation workshops. The table below provides a breakdown of the organisations represented at the workshops.

[9] Scottish Energy Performance Certificate Register Lodgement Fees and Penalty Charges - Scottish Government consultations - Citizen Space

Respondent profile	Number	Percent
Approved Organisations (AO)	2	4%
Chartered Surveyors	3	7%
Consumer Advice Bodies	2	4%
Design and Build Consultants	4	9%
Energy Focused Organisations	13	28%
Equality Rights Groups	1	2%
Financial Services Providers	1	2%
Heating Systems Manufacturers	3	7%
Housing Associations*	3	7%
Local Authorities**	7	15%
Real Estate Software Platforms	3	7%
Representative Trade Bodies	4	9%
Total	**46**	**~100%**

Table 2: Respondent Profile - Workshop Events

*The housing associations included two from mainland Scotland and one island area.
**The local authorities included six mainland authorities and one island authority.
Note: this table does not add up to 100% due to rounding.

Of the 29 written responses received to the 2025 technical consultation on EPC lodgement fees and penalty charges, the analysis of the consultation responses sets out that, overall, between half and two thirds of respondents who answered the questions supported each of the proposals:

- 68% supported the use of a statutory fee levied on lodgement of EPCs to fund the new elements of the regulatory regime;
- 50% supported raising the statutory fees levied upon lodgement by £3.40 for both domestic and non-domestic EPCs;
- 61% supported a review of the lodgement fee level within two years of the new regulations coming into force;
- 57% supported reviewing the onsite audit and inspection function within two years of the new regulations coming into force; and
- 64% supported reviewing the penalty charges issued to those who do not provide a valid EPC within two years of the new regulations coming into force.

Respondents did also note there may be unintended consequences relating to the costs for social housing providers, potential future fee increases, and impacts on rural/ islands areas. We have aimed to address these concerns within the suite of impact assessments accompanying the revised EPC regulations.

Across each of the proposals, most of the opposition came from individuals rather than organisations. On this basis, the Scottish Government has decided that it is appropriate and proportionate to increase the EPC lodgement fee to the level set out in the new regulations, and to review this within two years of the new regulations coming into force.

The Scottish Government has also decided that it is appropriate and proportionate to keep the EPC penalty charge at its current level, and to review this within two years of the new regulations coming into force.

3.3 Scottish Government Response

Wellside Research were commissioned to undertake an independent analysis of responses. The report presents the findings from the public consultation and explains the methodology that was used to analyse responses.

The responses, together with the analysis report, have helped to inform and shape the new Regulations.

In response to the technical consultation on EPC lodgement fees and penalty charges, we can now confirm that we will:

- Amend EPC lodgement fees within the new Regulations (to £6.00 for domestic certificates and £15.50 for non-domestic certificates, as specified at Regulation 15), to ensure that they can cover the costs of providing the technical and operational infrastructure to support the EPC Regulations and which provide benefit to consumers;
- Use the lodgement fees to support the development and delivery of a new EPC Register (Regulation 14), a new EPC Calculation Methodology (Regulation 10, which will be fulfilled by the Home Energy Model and updated SBEM), and to support the establishment of a new onsite audit and inspection function (Regulation 12) overseen by the Scottish Government to ensure continued improvements to EPC accuracy and reliability;
- Retain EPC penalty charges at the level currently set in the 2008 (Regulation 23);
- Review lodgement fee and penalty charge levels every two years to ensure they remain fair and proportionate; and
- Review the onsite audit and inspection function within two years to see if it is fit for purpose and continues to be needed.

4. Quality Assurance and Approved Organisation Framework

Throughout 2024 and 2025, the Scottish Government undertook a review of the operational governance of EPCs, which covered five main thematic areas:

- Appointment and management of “Approved Organisations” (AOs) who oversee the EPC assessor market in Scotland and the Operational Framework[10] they adhere to;
- Quality assurance (audit and inspection for EPC assessors);
- Enforcement of regulations;
- Consumer care; and
- EPC assessor skills and qualifications.

Our review has highlighted that, fundamentally, the existing EPC market is functioning in terms of the requirements set out within the Framework: building owners can secure access to EPC assessors, property transactions can take place, government funding schemes can award grant support, and our AOs are – broadly – fulfilling their obligations under the existing Operational Framework. However, when wider issues beyond the scope of the Operational Framework are considered, a clear case can be made for enhancing the overall assurance of the EPC regime – and we have identified a number of key areas where we think reform is needed. These proposals have been discussed directly with industry (including each AO individually), and the feedback we have received has been positive.

Regulations 11 and 12 make provision for the Scottish Ministers to approve an Approved Organisation to operate an Accreditation Scheme which they have also approved. EPC assessors must be members of an Accreditation Scheme.

The requirements of Regulation 12 set out the minimum legal requirements of future Accreditation Schemes – which will form the new Operational Framework requirements for AOs in Scotland. The Scottish Government proposes to further develop the detail of the provisions required in advance of inviting organisations to apply to become Approved Organisations under Regulation 11 ahead of the new Regulations coming into force in October 2026.

During Winter 2025-2026, once the detailed requirements of the Accreditation Schemes have been approved by Ministers, we will notify the market of the new enhanced Accreditation Scheme requirements and the new AO appointment process, inviting applications from existing AOs and new entrants to operate Accreditation Schemes. Applications will be appraised and, pending Ministerial approval, new appointment letters issued during summer/autumn 2026 ahead of the Regulations coming into force.

We intend in the first instance to introduce time-limited appointments for AOs to operate Accreditation Schemes. We could then move to longer terms of appointment where AOs have demonstrated competence and compliance. The terms of approval will also introduce more stringent requirements on AOs who perform poorly

[10] Approved Organisations – Energy Performance Certificates - Framework

(including remediation measures and formal notification procedures of intention to withdraw approval in the event of no improvement).

Alongside this work on AO appointments we will also:

- strengthen ongoing audit and reporting requirements on AOs; specifically working with AOs to introduce smart auditing when the Regulations come into force and (with advice from the Danish Energy Agency and Sustainable Energy Authority of Ireland) develop and agree the onsite audit and inspection requirements (to be overseen by the Scottish Government) to complement the existing EPC assessor desktop-based audit regime (which we expect to be operational during 2027);
- implement a new Scottish Government-AO operational governance decision-making structure;
- work with local government to develop an enforcement ‘toolkit’ (as agreed with COSLA) that can be ready to support the new Regulations coming into force, while also continuing to explore potential options for a lead local authority model;
- improve the recording and sharing of information relating to complaints, and increasing consumer awareness around escalation measures available to them;
- work with the UK Government and other devolved administrations to review and update the UK-wide National Occupational Standards relating to energy assessment during 2025-26;
- work with the AOs and the UK Government to ensure that EPC assessors are trained in the use of the new EPC Register and calculation methodologies, and to ensure they are familiar with the new EPC and Property Report and rating systems;
- work with the AOs to develop long-term arrangements to ensure delivery of Scottish-focussed CPD training for EPC assessors;
- work with the UK Government and other devolved administrations through our Memorandum of Understanding on Energy Performance of Buildings to consider UK-wide arrangements for consumer protection and the future of EPC assessor training and skills.

5. EPC Calculation Methodology and Rating System

Chapter 3, ‘EPC Rating System’, of the January 2025 Government Response[11] detailed the proposed changes to improve the EPC rating system for both domestic and non-domestic buildings.

Domestic EPCs

We can now provide an update on our approach to the ratings that will be displayed on domestic EPCs and the development of the new calculation methodology, using the new Home Energy Model. In informing the development of this model, we have engaged in further user testing with consumers, and with expert stakeholders on the built environment to help advise on the logic which the new HEM-based calculation should follow when generating the new EPC ratings. Below we set out our initial high level intentions. These will be further refined during 2025-26 ahead of publication and adoption of the full calculation methodology under the new regulations when they come into force in autumn 2026.

5.1 Approach to Heat Retention Rating

As set out in the January 2025 Government Response, the Heat Retention Rating design will allow consumers to understand how well-insulated their home is, by giving information on how much energy they need to use to heat their home to a comfortable temperature.

We have designed the rating system, and tested it with users, to ensure that it reflects Scottish Government policies on improving home energy efficiency. Buildings with the highest heat retention will be those at Band A, with the greatest level of insulation and which therefore use the lowest amount of energy for heating. Those at Band G conversely will use the highest amount of energy because they have the poorest heat retention. Band C represents a good level of energy efficiency (and has been set to ensure equivalence with 80% of homes which are currently at Band C on the old-style EPC under the 2008 Regulations – see Section 5.2 below on amendment to the bandings following further modelling using the Home Energy Model).

The Heat Retention Rating will be calculated based on the energy (kWh/m^2/year) needed to maintain the temperature of the dwelling’s living area at 21^{o}C. It will be displayed on the EPC as a current and potential rating.

The Property Report accompanying the EPC will suggest potential improvement measures that the property owner could take to improve the Heat Retention Rating. It will set out all of the measures that would be necessary to ensure the property achieves a good level of energy efficiency (Band C on the HRR). The measures selected will be ranked according to the lowest installation cost (in £) and the greatest amount of heat saved (in kWh) – with those which achieve the greatest saving for the lowest cost, suggested at the top of the list.

[11] Energy Performance Certificate reform consultation: response - gov.scot

The potential improvement measures presented on the EPC may require further investigation to determine whether or not they are suitable for a particular building. The Property Report will therefore also clearly state that building owners should always seek further professional advice on suitability before installing any measures.

We are continuing to test the presentation of this approach with users as we finalise how this information will be displayed on the redesigned certificate.

5.2 Adjustment to Heat Retention Rating Bands

In the January 2025 Government Response, we set out our approach to the A-G banding of the Heat Retention Rating. Our Response made clear that we had used the level of performance of the existing EPC Band C (on certificates issued under the 2008 Regulations) as the benchmark for Band C on the new Heat Retention Rating. This was to maintain a level of equivalence between the Heat Retention Rating and the existing cost-based Energy Efficiency Rating – and to ensure that, as far as possible, most properties achieve a similar Heat Retention Rating to their current EPC banding.

The Scottish Government has therefore made a clear commitment to ensuring that the bandings which we adopt for the new fabric Heat Retention Rating will retain broad equivalence with the current EPC Band C, which has been long-recognised as being a 'good' level of energy efficiency. We are therefore committed to ensuring that Band C on the new Heat Retention Rating will also represent a 'good' level of energy efficiency. Ensuring equivalence between current EPC Band C and HRR Band C is vital to minimise any detriment from moving to the new rating system, particularly for those property owners who have already taken action to improve their property to current EPC Band C.

In setting the thresholds for each band, we cited research conducted on behalf of the Scottish Government[12] that showed where Heat Retention Rating Band C was set between 71-120 kWh/m^2/year of energy used to heat the home, then for a sample of Scottish dwellings around 80% of homes that are currently at EPC C would also achieve Band C on the Heat Retention Rating.

This modelling used the current Standard Assessment Procedure (SAP) calculation methodology, but not the new Home Energy Model which will be used to calculate ratings under the 2025 Regulations. Since June 2025, the Scottish Government has now been able to use an initial version of the Home Energy Model to test the performance of the stock against the new Heat Retention Rating more precisely. This is because the Home Energy Model is a more sophisticated, and therefore accurate, tool than SAP[13].

[12] BRE Client Report - Development work relating to a potential new metric for Scottish Energy Performance Certificates

[13] The UK Government's Home Energy Model Consultation sets out, as an example of the additional complexity of the Home Energy Model, that it "is the result of a significant development process which has sought to align with modern international energy modelling standards and the best available technical evidence. The new model simulates energy performance for each half-hour of the day (as compared to each month for SAP), enabling a better representation of smart technologies and systems".

In June 2025, we commissioned an independent study[14], by Cotality, who have now run the Scottish housing stock through this initial version of the Home Energy Model to provide an updated analysis of the stock using the Heat Retention Rating. It is important to note that this modelling has been undertaken using the current version of the Home Energy Model, which is not yet final. The results will be reviewed when the UK Government's development of HEM, and our development of the Scottish version of HEM, completes in 2026, ahead of it being adopted as the official calculation methodology under the new Regulations.

The Home Energy Model calculation showed that the actual level of energy consumption for 80% of homes currently at EPC Band C was in the range of 91-159 kWh/m2/year, rather than the range of 71-120 kWh/m2/year, estimated by BRE. When the upper boundary of the band is set to 120 kWh/m2/year, only 50% of properties currently at EPC Band C achieve HEM HRR Band C, as opposed to around 80% of the sample modelled with SAP. This would therefore not meet our objective of ensuring equivalence with current EPC Band C.

If we retained the Band C thresholds previously calculated using SAP (71-120 kWh/m^2/year), this means that the Band C performance standard would be much closer to the equivalent of what the Home Energy Model is showing as the energy consumption of properties currently at EPC Band B – i.e. a higher level of performance than current EPC Band C. This is because the median HEM HRR for homes in SAP EPC Band C is 127 kWh/m^2/year, 23 kWh/m^2/year higher than the median previously calculated using SAP. The range for current Band B is 31-90 kWh/m^2/year, which represents a significant overlap with the 71-120 kWh/m^2/year range proposed for HRR Band C by BRE.

If we were to retain the bandings suggested in the BRE research, we would therefore not ensure that HRR Band C was broadly equivalent to current Band C, and would instead be asking many properties to achieve a level of performance equivalent to current Band B.

The Scottish Government has therefore decided to adjust the bandings on the Heat Retention Rating which we intend to adopt for further more detailed modelling between now and the final version of the Home Energy Model which is expected to become available during 2026. In adjusting the bandings in this way, we are ensuring full transparency for stakeholders and Parliament when scrutinising the new Regulations and understanding their impacts. The ultimate bandings adopted as required by Regulation 10 of the new Regulations, when they come into force in October 2026, may see some further adjustment, but this will always be done to meet our commitment to ensuring HRR Band C is broadly equivalent to existing EPC Band C.

The adjusted Band C for further modelling will now run from 91-159 kWh/m^2/year of energy used to heat the home. This then continues to ensure that around 80% of homes that are currently at EPC C would also achieve Band C or better on the Heat Retention Rating and does not make it harder or easier for properties currently at EPC Band C to achieve HRR Band C.

[14] Energy Performance of Buildings (Scotland) Regulations 2025: stock model research - gov.scot

We believe that this decision demonstrates that we are continuing to take a proportionate and fair approach to finalising the new rating system prior to adoption, and to ensuring that we are banding a ‘good level of energy efficiency’ at a level which is broadly equivalent to Band C on the existing EPC. This approach recognises and safeguards for the significant majority of properties, the improvements and investments that many building owners have made in good faith to reach Band C under the 2008 Regulations.

We are therefore adjusting the Heat Retention Rating bands as below for the purpose of undertaking further modelling, ahead of the Home Energy Model being finalised in 2026.

HRR Band	HRR Band kWh/m^2/year	Percentage of the stock achieving rating
A (Dark green)	0-30	2%
B (Bright green)	31-90	13%
C (Light green)	91-159	38%
D (Yellow)	160-242	34%
E (Orange)	243-292	8%
F (Dark orange)	293-309	2%
G (Red)	310+	3%

This revised banding approach means that approximately 54% of the stock achieves HRR Band C or better. This aligns with the pooled Scottish House Condition Survey data for 2019, 2022 and 2023, which found that on average 51% of dwellings achieved EPC Band C or better over the period[15].

These revised bandings will be used as a basis for further more detailed modelling of the specific measures that would need to be installed across the housing stock in order to achieve Band C on the Heat Retention Rating. As development of the Home Energy Model is finalised during the next 12 months, the Scottish Government will continue to refine its modelling and assessment of the current stock. We will therefore ensure that the final bandings adopted in the statutory calculation methodology (which will be adopted when the regulations come into force in October 2026) maintains our commitment to ensure that Heat Retention Rating Band C is

[15] Unfortunately, due to Covid-19 restrictions it was not possible to resume the 2020 SHCS and the 2021 SHCS was undertaken using an external+ approach. However, due to the change in approach for the 2021 SHCS, the results are not directly comparable with the National Statistics from previous waves of the survey. Therefore 2019, 2022 and 2023 data was used for this analysis.

broadly equivalent to current EPC Band C and therefore minimising any detriment of moving to the new fabric-based rating system.

5.3 Approach to Heating System Rating

The Government Response issued in January 2025 set out our intention that the Heating System Rating would be based on emissions categories (clean, renewable, hybrid and polluting) and would have separate ratings of the running cost and thermal efficiency. It also set out our intention to subject this to further user testing.

After issuing the Response, we have undertaken significant development and user testing of the new EPC rating system, including with both expert stakeholders and members of the general public. We commissioned two phases of iterative design and user testing over the past year. This included a range of participants who had interacted with EPCs (i.e. house buyers, sellers, landlords, and tenants). We also led stakeholder working groups with recognised experts from academia, industry, and consumer groups.

This engagement provided clear, consistent, feedback that users prefer straightforward, simple, information and ratings that provide a clear message to building owners. Feedback suggested the public understand a single colour-coded A-G letter rating. They are familiar with this because we already use this on EPCs, and it is widely used in energy labelling of products. We also received feedback from experts in the Regulatory Review Group that the labels ‘polluting, renewable, clean and hybrid’ would not be well-understood by the public and risked consumer confusion.

We have therefore refined our design of the Heating System Rating from the one set out in the Government Response in January. Instead of using labels such as ‘clean’ or ‘polluting’ we will now use a single, colour-coded A-G letter, which is consistent with the approach we are taking to the EPC’s Heat Retention Rating and Energy Cost Rating, which will also use colour-coded A-G ratings.

Additionally, reflecting user feedback, we have now decided to refer to the rating as the Heating System Rating, rather than Heating System Type Rating. This is a simpler way of communicating the purpose of the rating to the public.

5.4 Amendment to Heating System Rating – new Bandings

The new Heating System Rating design will allow consumers to understand both the emissions and efficiency of their current main heating system and the impacts of alternative, lower emission and more efficient heating systems. Heating systems with the lowest emissions (and highest efficiency) therefore receive an A rating and those with the highest emissions (and lowest efficiency) receive a G rating. The rating will be displayed on the EPC as a current and potential rating.

The bands are ranked according to a single calculation of the emissions and the efficiency of the heating system using standardised factors used within the Home

Energy Model. This system means that, for instance, a gas boiler could achieve a rating within E-G depending on the boiler efficiency. However, any fossil fuel heating system with direct greenhouse gas emissions could not be rated C or better, and a clean fuel could not be rated worse than C.

Ratings	Heating System Type	Principle
A (Dark green)	Heat Pump	Zero direct emissions, highly efficient (>100%)
B (Bright green)	Heat Network, Direct Electric, Hydrogen	Zero direct emissions, efficient
C (Light green)	Bioenergy, Hybrid (bioenergy/electric)	Near net zero emissions
D (Yellow)	Hybrid (fossil fuel/electric)	Partial zero direct emissions
E (Orange)	Gas, LPG	Emitting, increasing emissions E-G, lower efficiency
F (Dark orange)	Oil	Emitting, increasing emissions E-G, lower efficiency
G (Red)	Coal, Peat	Emitting, increasing emissions E-G, lowest efficiency

The Property Report accompanying the EPC will suggest potential alternative heating systems that the property owner could install which would represent improved levels of efficiency and reduced levels of emissions. It will also include information on the estimated costs of installation and operation of these potential alternative heating systems. Each home will receive a potential rating at Band C or above, which will suggest alternative heating systems (with Band C (or above) representing a good level of emissions and efficiency).

If the home's current heating system creates greenhouse gas emissions from combustion of fossil fuels, and so is rated D or worse, the EPC will state that the building can achieve a Heating System Rating of C or better (i.e. by installing a heating system based on bioenergy, district heat, or electricity).

If the heating system is already using a clean fuel, and so rated C or better, the EPC will state A or B can be achieved (i.e. that bioenergy could be replaced by electric heating or a heat pump to improve the rating). If the heating system is a heat network, no improvements will be suggested (the EPC will also record where a building is located in a Heat Network Zone). If the heating system is already rated Band B (and not a heat network), Band A (a highly efficient zero emissions system such as a heat pump) will be suggested.

Given that there is no requirement for a property owner to act upon the potential alternatives suggested by the EPC, **the Heating System Rating remains for information-only.**

The alternative heating systems presented on the EPC may require further investigation to determine whether or not they are suitable for a particular building. The Property Report will therefore also clearly state that building owners should always seek further professional advice on suitability before installing any alternative heating systems.

We are continuing to test this approach with users as we finalise how this information will be presented on the redesigned certificate.

5.5 Approach to Energy Cost Rating

The January 2025 Government response set out our decision to retain the current Energy Efficiency Rating used under the 2008 Regulations, and to rename this as the Energy Cost Rating. The Energy Cost Rating (£/m²/year) will tell consumers how much it costs to power a home each year to provide things like heating the home to a comfortable temperature, hot water demands, cooling, lighting, and ventilation. It will use an A-G rating scale, with A indicating a property with low energy costs and G a property with high energy costs. Band C will represent a reasonable energy cost. The rating will be displayed on the EPC as a current and potential rating.

We have designed the Energy Cost Rating, following feedback from users and public consultation, to follow as closely as possible, the approach used to generate the Energy Efficiency Rating on EPCs under the 2008 regulations. This rating is generated by combining the estimated energy demands of the building's heating, lighting, cooling and ventilation (taking into account its level of insulation), with reference tariffs for common fuels. The old EER assumed that all dwellings rated were located in a UK average climate, whereas the new Energy Cost Rating will assume a Scottish average climate.

To calculate the Energy Cost Rating, the system will use standard energy prices based on what costs are expected to be from 2026. The Energy Cost Rating will therefore take the results for the Heat Retention Rating and Heating System Rating (together with energy used for lighting, cooling and ventilation) and use them to calculate the current cost of energy to the homeowner, and the potential cost of energy if the property was to achieve its highest potential rating on the Heat Retention Rating and if it was to install each of the alternative heating systems at Band C or above on the Heating System Rating.

This will result in a single current Energy Cost Rating and a range of potential Energy Cost Ratings, depending on the different alternative heating systems which could be installed. We are continuing to test this approach with users as we finalise how this information will be presented on the redesigned certificate.

Non-domestic EPCs

5.6 Non-domestic ratings

The January 2025 Government Response set out our intention to introduce 3 ratings on non-domestic EPCs:

- Energy Efficiency Rating (A to G, kgCO2e/m^2/year) – based on modelled emissions from regulated energy use relative to a reference building to align with the rating system used across the UK;
- Direct Emissions Rating (kgCO2e/m^2/year) – the building's modelled direct emissions from regulated energy use to allow a focus on the decarbonisation of individual buildings. For buildings which only use grid electricity, or are connected to a heat network, this will be zero;
- Energy Demand Rating (kWh/m^2/yr) - the building's modelled regulated energy use under standardised conditions to allow comparisons between buildings.

We also said that we would clearly show a rating for the main Heating System for the Building, based upon the same Heating System Type Rating classification as used on the domestic EPC.

We are still finalising user testing of the redesigned non-domestic EPC and new ratings. Following this, we are making very small changes to rename the ratings to help ensure they more clearly reflect the thing they are measuring:

- rename 'Energy Efficiency Rating' to 'Energy Performance Rating' (with everything else remaining the same as set out in January 2025);
- rename 'Energy Demand Rating' to 'Energy Use Rating' (with everything else remaining the same as set out in January 2025).

Following further user testing, we propose to adopt, as a secondary indicator, a Heating System classification similar to the one that we will use in the revised Heating System Rating for the domestic EPC.

6. EPC Design

As we set out in the January 2025 Government Response to the EPC Reform Consultation, we know that introducing new ratings and information on to the EPC has the potential to make it harder to understand. We set out our draft reformed EPC design and said that we would undertake further iterative design and user testing to improve the ability of the EPC to communicate technical information.

We have now completed phase two of this user testing. This has refined the design of the Heating System Rating and text on the Domestic EPC and Property Report. We have also reviewed the text on the Non-Domestic EPC and Property Report.

The current versions of the initial pages of the design are shown below, and are still subject to further user testing prior to the new Regulations coming into force:

Scotland Scottish Government | Scottish Energy Performance Certificate Register

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Home › Find an energy certificate › Nav level 3 › Current page

Property details

Address

123 EPC street
Glasgow
G12 2BC

Dwelling type

End-terrace house

Total floor area

86m²

Date of certificate

21 July 2023

Reference number

0000-0000-0000-0000

Table of contents

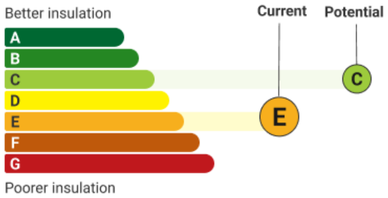
Certificate

Energy Performance Certificate (EPC)

Heat-retention rating

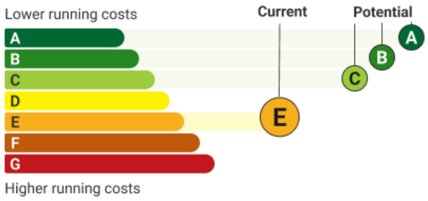
This rating shows how well your property is insulated to keep warmth in.

Your Rating of E is lower than the Scottish Average of D. The potential rating is based on installing all measures highlighted in Potential heat retention improvements section.



Energy cost rating

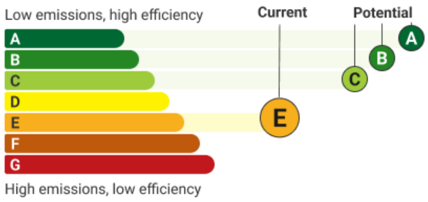
This rating shows the energy efficiency and energy costs of this home.



Heating system rating

This rating shows the combined direct emissions and efficiency of the heating system currently installed.

Your heating system is E. The potential rating is based on installing all measures highlighted in Heating system alternatives section.



Heating system emissions (see Heating system information section for details). Your property may be suitable for a system that produces less emissions. See how a cleaner heating system could reduce your emissions below.

Potential improvements and savings

Improvements, such as:

- Loft insulation
- Cavity insulation
- Suspended floor insulation

Could help reduce your annual bills by **15%**

Find out more about the potential improvements and alternative heating systems in the Property Report.

Property report

Introduction

An EPC assessment is a survey that collects basic information about the property such as the type of property, size and age. This EPC and the property report explain the energy efficiency of the property and how to improve it. Improving your home's heating and insulation could reduce energy costs, reduce emissions and make your home warmer. The EPC assessment uses both measurements and assumptions. The age of the property, and other factors, are used to determine some information about the house where this can't be seen, such as insulation inside the walls. This information is used to calculate the EPC. The condition of the property is not taken into account in the assessment.

Estimated energy costs for this home

These figures show how much the average household would spend in this property for heating, lighting and hot water.

This excludes energy use for running appliances such as TVs, computers and cookers, and the benefits of any electricity generated by this home (for example, from solar panels).

The potential savings in energy costs show the effect of undertaking all of the potential improvement measures listed in this report.

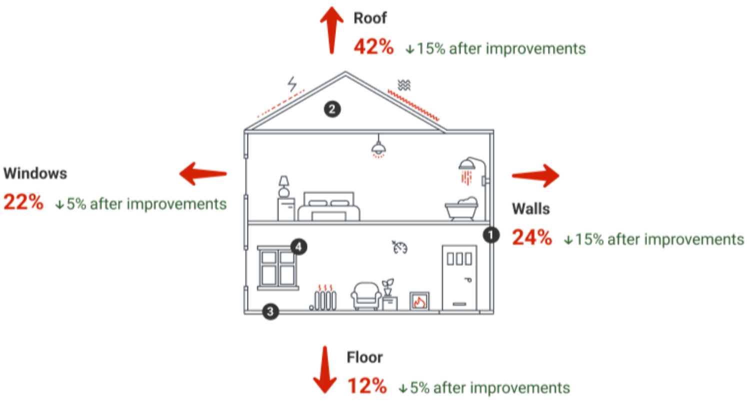
Category	Current costs	Potential costs
Heating	£1,763	£1,275
Hot water	£303	£205
Lighting	£202	£135
Total	**£2,268**	**£1,615**

Potential future savings

Typical savings per year up to: **£653**

Heat retention summary of this home

This drawing illustrates the distribution of heat lost in your property. It highlights the key areas where heat escapes, including the roof, walls, windows, and floor. Understanding these figures can help you identify the most effective ways to improve energy efficiency and retain heat and reduce heating costs.



How to interpret the ratings:

1. **Walls** D
   Solid brick, as built, no insulation (assumed*)
2. **Roof** F
   Pitched, 200 mm loft insulation
   Pitched, no insulation (assumed*)
3. **Floor** B
   Suspended, no insulation (assumed*)
4. **Windows** C
   Fully double glazed

- A Very good (most efficient)
- B Good
- C Good
- D Average
- E Poor
- F Poor
- G Very poor (least efficient)
- Does not apply

* Assumed means that the insulation could not be inspected and a determination has been made based on age and type of construction.

Potential heat retention improvements

The measures below aim to improve the heat retention and reduce the emissions of this property.

The "Potential improvement" are suggested first steps, starting with low-cost options that provide good value, followed by higher-cost improvements with long-term benefits.

Performance ratings are cumulative, assuming the measures are implemented in the order listed.

Potential improvements

Potential improvement	Estimated installation cost	Estimated annual energy saving	Potential heat-retention rating
1 Loft insulation	£500 – £1,500	5,000 kWh	D
2 Cavity insulation	£1,500 – £2,500	5,000 kWh	C
3 Suspended floor insulation	£2,000 – £3,000	500 kWh	C

Potential improvements explained

Before carrying out work, make sure that the appropriate permissions are obtained, such as permission from a landlord (if you are a tenant).

* Building regulations may apply to home energy efficiency and heating improvements and sometimes require a building warrant. It is best to check with your local authority building standards department or contact a qualified professional.

- **Loft insulation**
  Installing loft insulation to a depth of at least 270mm in the loft space or between roof rafters will significantly reduce heat loss through the roof; this will improve levels of comfort, reduce energy use and lower energy bills. There must be adequate ventilation in the loft space to prevent dampness; seek professional advice about this if you're unsure.
- **Cavity wall insulation ***
  Cavity wall insulation is insulation material that fills the gap between the inner and outer layers of external walls to reduce heat loss through the walls; this will improve levels of comfort, reduce energy use and lower energy bills. The insulation material is pumped into the gap through small holes that are drilled into the outer walls, and the holes are made good afterwards. As specialist machinery is used to fill the cavity, a professional installation company should carry out this work.
- **Floor insulation (suspended floor)**
  Insulating a floor will significantly reduce heat loss; this will improve levels of comfort, reduce energy use and lower energy bills. Suspended floors can often be insulated from below but must have adequate ventilation to prevent dampness; seek advice about this if you're unsure.

Funding, advice and support

Home Energy Scotland may be able to provide funding for these recommended measures and can also offer free advice and support to help you make your home warmer, reduce energy bills, and contribute to a greener, more sustainable future.

Please visit www.homeenergyscotland.org or call 0808 808 2282

Heating system information

The way we heat our homes, workplaces and other buildings is the third-largest cause of greenhouse gas emissions in Scotland. This is because the heating systems most of us use produce emissions when we use them.

Your main heating system	Heat system rating	Estimated emissions	Estimated installation costs
Fossil fuel boiler	E	51 kg CO_2/m²/year	N/A (already in place)

Efficiency rating scale

- A Very good (most efficient)
- B Good
- C Good
- D Average
- E Poor
- F Poor
- G Very poor (least efficient)
- – Does not apply

Heating system alternatives

Alternative heating system	Heat system rating	Estimated Emissions kgco2/m2/year	Estimated Installation Costs	Estimated running Costs
Heat pump	A	Zero	£7,000	£7,000
Direct electric	B	Zero	£5,000	£14,000
Hybrid heat pump (connected to biomass fuel supply)	C	Zero	£5,000	£5,000

Other energy efficiency improvements

The measures below can also improve the overall energy efficiency of your property and reduce emissions.

Potential improvements

Potential improvement	Estimated Installation Costs
Low energy lighting for all fixed outlets	£25 – £58
Solar water heating	£4,000 – £6,000
Solar photovoltaic panels, 2.5 kWp	£3,500 – £5,500

Secondary ratings

Indicator	Metric
Emissions indicator This indicates the total direct emissions (e.g. from a heating system) and indirect emissions. (e.g. from generation of electricity used in the building).	**12345.67** $kgCO_2e$/m²/year
Energy use indicator The total energy used from heating, cooling, ventilation and lighting.	**12345.67** kWh/m²/year
Primary energy use This is the energy use multiplied by a primary energy factor represent transmission losses.	**12345.67** kWh/m²/year

About this document

Contacting the assessor

If you're unhappy about your property's energy assessment or certificate, you can complain to the assessor who created it.

Assessor Name
Telephone
Email
Phone

Contacting the accreditation scheme

If you're still unhappy after contacting the assessor, you should contact the assessor's accreditation scheme.

Accreditation scheme
Assessor's ID
Telephone
Email

About this assessment

Assessor's declaration

Date of assessment
Date of certificate
Type of Assessment

Other certificates for this property

If you are aware of previous certificates for this property and they are not listed here, please contact us at

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RRN2

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Property details

Address

123 EPC street
Glasgow
G12 2BC

Building type

Office/Workshop

Total conditioned area:

6065.27m2

Date of certificate

21 July 2023

Reference number

0000-0000-0000-0000

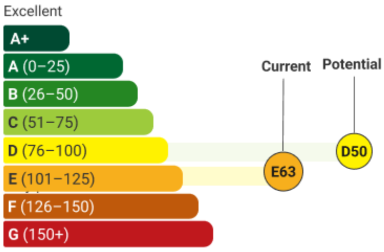
Table of contents

Certificate

Energy Performance Certificate (EPC)

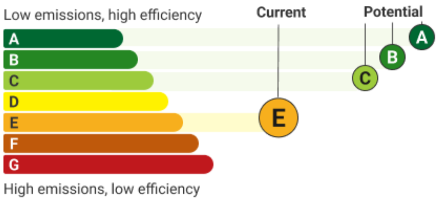
Building energy performance rating

This measures the energy rating of your building based on a modelled total emissions relative to a reference building.



Heating system rating

This rating shows the combined direct emissions and efficiency of the heating system currently installed.



Heating system emissions (see link here for details). Your property may be suitable for a system that produces less emissions. See how a cleaner heating system could reduce your emissions below.

Energy use

Approximate energy use per year: **103 kWh per m²**

Direct emissions

Approximate carbon dioxide emissions per year: **48.65 kg CO_2 per m²**

Building report

Introduction

The EPC assessment collects information about the building and uses the Government approved calculation methodology to model the energy used in the heating, hot water, lighting and ventilation systems of the building. Improving these aspects could reduce energy costs and reduce emissions. Different fuels produce different amounts of carbon dioxide for every kilowatt hour (kWh) of energy used. The calculation methodology applies emission factors to energy use for each fuel used to give an overall rating for your building. This assessment covers all fixed building services but excludes energy used in portable appliances, office equipment, and for industrial processes. As buildings can be used in different ways, the energy use is calculated using assumptions which may be different from the way you use your building. The rating also uses national weather information to allow comparison between buildings in different parts of Scotland. You can find out more about the assessment process and approved software tools at: www.gov.scot/publications/energyperformance-certificates-guid

Potential improvements and savings

Improvements, such as:

- Loft insulation
- Cavity insulation
- Suspended floor insulation

Could pay for themselves in three years.

Regulatory requirements

Section 63 of the Climate Change (Scotland) Act require the assessment and improvement of existing non-domestic buildings with an area of more than 1,000 m2. See this webpage for information. This building is subject to these regulations as it exceeds 1,000 m2 in area. However, buildings with energy performance equivalent to that set by the 2002 building regulations are exempt. This EPC assessment shows that your building meets the 2002 standard and no further action is needed to comply with these regulations.

Heating system emissions

The way we heat our workplaces, homes and other buildings is the third-largest cause of greenhouse gas emissions in Scotland. This is because the heating systems most of us use produce emissions when we use them.

Your main heating system	Heat retention rating	Estimated emissions	Estimated installation costs
Fossil fuel boiler	E	51 kg CO_2/m²/year	N/A (already in place)

Efficiency rating scale

- A Very good (most efficient)
- B Good
- C Good
- D Average
- E Poor
- F Poor
- G Very poor (least efficient)
- – Does not apply

Heating system alternatives

Alternative heating system	Heat system rating	Estimated Emissions	Estimated Installation Costs	Estimated running Costs
Heat pump	A	Zero	£7,000	£7,000
Direct electric	B	Zero	£5,000	£14,000
Hybrid heat pump (connected to biomass fuel supply)	C	Zero	£5,000	£5,000

Potential improvements

The measures below will improve this building's energy and environmental performance. These measures have been checked by your assessor as being potentially appropriate for your building and are listed under four headings: short payback period, medium payback period, long payback period, and other improvement measures.

Please note, these recommendations do not include advice on matters relating to the operation and maintenance of your building and as such cannot be identified or represented within the calculation process.

Payback periods

Payback periods are based upon data provided by Good Practice Guides and Carbon Trust energy survey reports and are average figures calculated using a simple payback method. To find out more see: www.link.gov

Potential impact reducing carbon emissions

Each measure is assigned a low, medium or high potential impact on the building's energy efficiency. This relates to their potential to reduce carbon emissions arising from energy used in your building. To find out more see: www.link.gov

Potential improvements by payback period

Potential improvments	Potential impact reducing carbon emissions
Short payback (less than 3 years)	
The default heat generator efficiency is chosen. It is recommended that the heat generator system be investigated to gain an understanding of its efficiency and possible improvements.	Low
Some walls have uninsulated cavities - introduce cavity wall insulation.	Medium
Medium payback (3-7 years)	
Some windows have high U-values - consider installing secondary glazing.	High
Add local time control to heating system	Low
Carry out a pressure test, identify and treat identified air leakage. Enter result in EPC calculation.	Medium
some glazing is poorly insulated. Replace/improve glazing and/or frames.	Medium
Long payback (more than 7 years)	
Consider installing building mounted wind turbines.	Low
Consider installing solar water heating.	Low
Consider installing PV.	Low

Other measures

This section lists other measures selected by your assessor based upon an understanding of the building and/or a valid existing Recommendations Report.

The advice provided in this Recommendations Report is intended to be for information only. Recipients of this report are advised to seek further professional advice before making any decision on how to improve the energy performance of the building.

Potential improvments	Potential impact reducing carbon emissions
Install LED lighting throughout.	Low

Funding

Business Energy Scotland may be able to provide funding for these recommended measures and can also offer free and impartial support to help small and medium-sized enterprises save energy, carbon, and money. Please visit, www.businessenergyscotland.org or call 0808 808 2268.

About this document

Contacting the assessor

If you’re unhappy about your property’s energy assessment or certificate, you can complain to the assessor who created it.

Assessor Name
Telephone
Email
Phone

Contacting the accreditation scheme

If you’re still unhappy after contacting the assessor, you should contact the assessor’s accreditation scheme.

Accreditation scheme
Assessor’s ID
Telephone
Email

About this assessment

Assessor’s declaration

Date of assessment
Date of certificate
Type of Assessment

Other certificates for this property

If you are aware of previous certificates for this property and they are not listed here, please contact us at

RRN1
RRN2

7. Next Steps

This updated Government Response confirms the Scottish Government's commitment to laying new EPC regulations in the Scottish Parliament in October 2025, using our powers under s.250 of the Energy Act 2023.

It also confirms our commitment to ensuring that there are 12 months between the regulations being laid and them coming into force in October 2026, therefore ensuring sufficient time for the market to prepare for the changes to come into effect.

The transitional provisions within the regulations also ensure that we are supporting parts of the property market which could be negatively impacted when the new regulations come into force.

Once Parliament has scrutinised and agreed the new regulations, the Scottish Government will undertake the following next steps:

- engaging further with stakeholders who are directly affected by the regulations: in the Approved Organisations, assessor businesses, estate and lettings agents, conveyancing solicitors, local authorities, landlords, mortgage lenders;
- communicating the changes to the wider public to explain the new rating system and the redesign of the certificate;
- working with government funding programmes and regulatory regimes which rely upon EPCs, to ensure they can take into account changes to the rating system within the operation of their schemes;
- working with the Approved Organisations and EPC assessor community to ensure that all assessors receive training on the new regulations and changes to the certificates and rating systems;
- working with the Approved Organisations, UK Government and EPC assessor community to ensure that assessors receive training on, and testing of, the new calculation software which be used to record and process data gathered by assessors, using the new Home Energy Model and updated SBEM calculation methodologies;
- completing the joint review of National Occupational Standards (NOS) for EPC assessors with the UK Government and other devolved administrations, to agree on the new skills and qualifications requirements for EPC assessors operating across the UK internal market;
- completing user testing of the redesigned EPC;
- testing the new EPC Register to meet Digital Scotland user accessibility and design standards, and appointing the Scottish Ministers as keeper of the Register, working with the UK Government on the technical infrastructure, to be funded through EPC lodgement fees;
- launching a process to allow existing and potential Approved Organisations to be (re)appointed by the Scottish Ministers when the new regulations come into force;
- setting out new operational governance requirements for Approved Organisations, and their member assessors, via their letters of appointment and new accreditation schemes (replacing the current Operational Framework), and through establishing a new joint governance decision-

making mechanism for operational matters between the Scottish Government and AOs;
- establishing a new onsite audit and inspection function within the Scottish Government, to be funded through EPC lodgement fees;
- continuing to work with the UK Government and other devolved administrations to provide UK-wide governance oversight to the assessor market through operation of our joint Memorandum of Understanding.

Post-Implementation Review

The Scottish Government has committed to reviewing both the level of EPC lodgement fees and penalty charges within two years of the regulations coming into force, to ensure they remain fair and proportionate. We are also committed to reviewing the operation of the onsite audit and inspection function, within two years of that function first being exercised.

We will continue to monitor and review the implementation of the regulations, and the associated operational and technical infrastructure, within the market, on a regular basis. We will continue to engage with stakeholders through our existing External Reference Group and independent sub-group, to take into account their views. Likewise we will continue to consult upon any further changes that the Scottish Government may wish to make to the regulations, or which may be needed to ensure they remain fit-for-purpose in delivering our objectives for the EPC system.

This publication is available at **www.gov.scot**

Any enquiries regarding this publication should be sent to us at

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