

Alex Rowley MSP
Room M1.04
Scottish Parliament
Edinburgh
EH99 1SP

(Sent by email to alex.rowley.msp@parliament.scot)

22nd July 2022

Dear Mr Rowley,

The Domestic Building Environmental Standards (Scotland) Bill

Thank you for your email of 30 May 2022, to Stop Climate Chaos Scotland, outlining your proposals for the above Member's Bill.

Introduction

[Stop Climate Chaos Scotland](#) ("SCCS") is a diverse coalition of over 60 civil society organisations in Scotland who campaign together on climate change. Our members include environment, faith and belief groups, international development organisations, trade and student unions and community groups. We believe that the Scottish Government should take bold action to tackle climate change, with Scotland delivering our fair share of action in response to the Paris Agreement and supporting climate justice around the world.

SCCS welcomes the opportunity to respond to the consultation on this proposed Member's Bill by means of this written submission. Our focus is strategic and cross-cutting and complements any more detailed submissions from our members on individual policy issues. This submission, therefore, takes the form of a written contribution, rather than seeking to complete the online questionnaire.

Buildings and climate change

The way that we heat our buildings (both residential and commercial), including the energy source and the extent of 'wasted' heat by leakage, is a significant contribution to the emissions driving climate change. The Climate Change Committee's [Report on Progress to the Scottish Parliament](#) in 2021 indicates that emissions from buildings totalled 8.5MtCO₂e in 2019 – representing a 22% fall since the 'baseline' year of 1990. This underlines the report's conclusion that "strong progress in the power sector has dominated, with smaller reductions in some sectors and increases in others". Buildings is one of those sectors where reductions have been limited and needs to accelerate if targets are to be met.

Scottish Government action

Climate change is rightly a key priority for the Scottish Government and Parliament. The Climate Change (Scotland) Act 2009, as amended, sets commendable targets for the reduction of emissions, and requires that the Scottish Government produce a Climate Change Plan setting out their policies to achieve these reductions. Section 35 of the 2009 Act requires that buildings (residential and public) is a sector that must be addressed in that plan.

In our submissions on the recent update to the Scottish Government's Climate Change Plan update (CCPu), we called for a number of improvements, including: -

- A firm policy that building standards will be revised to deliver high energy efficiency and low carbon heating.
- A revision of building standards so all new buildings meet the highest energy efficiency standards from 2021.

The final version of the CCPu does include a number of welcome aspirations, including a proposal to introduce “regulations for all buildings to achieve a good level of energy efficiency” (although there is little clarity as to that “a good level” means) and a proposed investment of £1.6 billion in heat and energy efficiency over the next Parliament. These measures were commended by the Climate Change Committee, but they also indicated that the “CCPu sets out a very stretching pathway to reduce emissions from Scottish buildings.”

It is vital, therefore, that implementation of these measures is accelerated and that delivery improves.

Proposed Member's Bill

While dealing with only one aspect of the ‘buildings’ sector (new residential property), this Bill appears to propose the very highest standards of energy efficiency. This would be **a welcome additional measure to efforts to decarbonise the buildings sector** – and appears to be more ambitious than the current proposals for new Buildings Regulations from the Scottish Government.

As such, SCCS welcomes and supports this proposal as one measure that contributes to achieving the “stretching pathway”. Of course, it might also be achieved by improving the Scottish Government’s current proposals (and those to come in the next Climate Change Plan), and also needs to be accompanied by similarly ambitious efforts in relation to existing homes and public or commercial buildings.

SCCS supports any responses from our members, who have more specific expertise on this particular issue and may submit more detailed responses to the consultation. However, we also wished to express the coalition's strategic support and welcome for this initiative, as set out in this letter.

Thank you again for the opportunity to comment and, if it would be valuable, I would be pleased to arrange a meeting with relevant SCCS members to discuss this response, the proposed Bill and/or wider climate change issues.

Yours sincerely,

Stop Climate Chaos Scotland