

Written evidence submitted by the Energy Efficiency Infrastructure Group (EEIG) (RHF0055)

Introduction

The Energy Efficiency Infrastructure Group (EEIG) welcomes the opportunity to contribute to the Energy Security and Net Zero Committee's inquiry into retrofit failures and the path forward for achieving warm, energy-efficient homes.

The EEIG is a coalition of leading industry and trade bodies, businesses, including manufacturers, installers and other organisations representing the energy efficiency and decarbonisation supply chain. Our goal is to secure rapid improvement in energy efficiency and decarbonisation policy for UK homes and buildings, whilst helping to build consumer confidence and deliver quality home upgrades.

The recent suspension of 39 businesses due to poor-quality solid wall insulation is deeply concerning, however the EEIG members, many of whom have been actively engaged on quality assurance and standards, such as PAS 2035, remain fully committed to ensuring a robust compliance and oversight process. It is crucial that we support the Government and industry in addressing any failures that undermine confidence in government energy efficiency or clean heat schemes but also which may undermine consumer confidence in retrofitting or upgrading of homes.

We must also recognise the many good installs that have taken place through government schemes such as ECO, supported by existing quality assurance and standards. However, we need to better understand how we can strengthen the compliance and oversight process to address the bad actors who bring disrepute to our industry whilst not allowing these actors to deflect from the many responsible installers who are improving people's homes, particularly under government fuel poverty and social housing schemes.

As the EEIG is not privy to the detail of these specific retrofit failures we are therefore not best placed to comment, however we do call for a "root and branch" review to ensure that these cases of bad practice do not lead to systemic failure and we continue to have robust safeguards in place, alongside effective mechanisms for consumers to seek redress in cases of poor workmanship.

We would like to refer the committee to two EEIG members who are actively engaged in this area, specifically on quality assurance and certification – the IAA and MCS – and we would be very happy to connect you if you have not done so already.

The EEIG's short response focuses on the second Committee session on "*how best to reshape industry regulation and ensure Government targets are now safely met*" and the positive part that strengthening the link between retrofit measures with actual performance outcomes plays to support the successful delivery of the government's Warm Homes Plan.

Consumer Trust and Confidence: assuring customers of a positive retrofit experience

Previously the lack of consumer confidence has emerged as a significant barrier to the success of retrofit programmes with past experiences of substandard work and regulatory failures contributing to homeowners' scepticism in home energy upgrades or retrofit initiatives.

Below the EEIG has proposed two specific solutions to support building consumer confidence and assurances into the retrofit journey by linking retrofit measures with actual performance outcomes.

In a world with high energy costs, and where there is an urgent imperative to save on energy bills and reduce carbon emissions, it is more important than ever that new and retrofitted properties perform as intended. Simultaneously, consumers thinking about upgrading their homes need to feel assured they will get the performance they pay for. The 'real' performance of buildings matters.

This means the building fabric and low carbon heating systems must perform well in reality and we ask Government to ensure that policy:

- 1) Gives consumers confidence in retrofit projects by fully delivering on planned reforms to Energy Performance Certificates (EPC) to make them more accurate, trusted, and reliable; a 'true measure' of the performance of buildings.
- 2) Supports building owners in adopting innovative methods and technologies which measure the actual efficiency of their buildings so we give people confidence they will receive the best possible retrofit experience, removing a barrier to action. Measurement of real building performance also underpins exciting 'pay as save' business models and market offerings relying on assured energy savings.

⇒ **Making EPCs accurate, trusted, and reliable:**

The EPC Action Plan and wider reforms have set the UK on the right track, and notwithstanding the current EPC consultation, the planned actions now need to be fully delivered if the UK's transition to a net zero building stock is to be a success.

The EPC Action Plan 2020 states: *"In future EPCs will need to move from a reflection of the features of a building to the true measure of 'in-use' building performance...The Committee on Climate change specifically recommended in their 2018 and 2019 progress reports that EPCs need to reflect real-world performance."* See [Energy Performance Certificates for buildings: action plan \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/86482/energy_performance_certificates_for_buildings_action_plan.pdf)

EPCs already have several standard metrics providing information to the consumer about a property's possible running costs, energy performance, and emissions when used in a standardised way. Many EPCs now show the estimated space heating demand for properties based on calculations using the Standard Assessment Procedure (SAP).

To further this progress, our members have also recommended as part of on-going EPC reforms, not only that EPCs include an official metric relating to the fabric performance of dwellings, but also that the value shown on the EPC can be, and in time, is always based on the actual, measured

performance of the fabric,¹ giving a more accurate assessment which EEIG member, MIMA are calling an AFEE².

We are therefore extremely supportive of the Government's recent proposals^{3 4} to include a fabric performance metric on EPCs, and to drive fabric performance testing as part of EPC reform and 'pay for performance' in ECO4 and GBIS. The Government recognises that EPCs are now being used for a greater variety of purposes than was envisaged and that improvements are needed to make them more accurate and reliable, including incorporating the measured performance of buildings into the EPC process.

⇒ **Measurement of real building performance:**

There are also a growing pool of technologies and tools available which measure the actual efficiency of buildings or measures, before or after retrofit, and which can give people the confidence to press ahead with a project knowing they will get a quality outcome. These tools are gradually being validated, and can offer low-cost, low-disruption ways of verifying performance.

This week, EEIG member and Co-Founder, MIMA has published a report "Making Performance-Led Retrofit a Reality"⁵ setting out seven recommendations for UK policy and industry standards, geared towards building strong consumer trust and confidence in home retrofit.

Crucial to this vision is ensuring that consumers come with us on the Net Zero transition, but also that the insulation, energy efficiency, and decarbonisation, clean heat sectors work together to assure customers of a positive home retrofit experience and a great outcome. We envisage that a great outcome would be assurances that the energy savings and emissions reductions aimed for are realised, and consumer's homes are comfortable, healthy, and safe to live in.

This report is calling for policy and standards to evolve so that this can be achieved by 2030. It is well within our grasp that every household getting their home's fabric or heating system upgraded could be offered a form of "Outcomes-Based Guarantee" from their Retrofit Provider. This approach will assure and prove that the retrofit works do exactly what was intended i.e. "does what it says on the tin.". Any risk, whether actual or deemed, shifts away from the homeowner to the Retrofit Provider but also de-risks building decarbonisation and energy efficiency policy.

Conclusion

The EEIG is committed to supporting the government and industry in rectifying retrofit failures with effective, long-term robust compliance and oversight processes. In addition, by aligning the regulatory framework with independent verification systems, the government can safeguard consumers while reinforcing confidence in retrofit schemes and ensuring consistency across the industry.

¹ Based on the whole-house Heat Transfer Coefficient (HTC) measured in use

² See more in see [Knauf Energy Solutions on LinkedIn: 019578_207fd523b8e43a99452fa9d81be86bc.pdf](#)

³ The government's current consultation on EPC Reform includes proposals on this topic. See [Reforms to the Energy Performance of Buildings regime - GOV.UK](#)

⁴ See [Energy Company Obligation 4 and the Great British Insulation Scheme: consultation on mid-scheme changes](#)

⁵ See full report, summary and recommendations at www.mima.info

We would also highlight the recommendations in the EEIG's manifesto⁶ which include enhanced quality assurance, improved training and accreditation and strengthened consumer protections—as well as a publicly accessible database of accredited installers with a track record of quality work to help consumers make informed choices.

With the EEIG's manifesto recommendations and the specific solutions outlined in this response, the UK can create a retrofit industry that is ready to support the Government to ensure that the Warm Homes Plan succeeds in reducing energy bills, creating good jobs, building consumer confidence in the retrofit journey and making the UK's housing stock fit for a net-zero future.

We urge Government to ensure market-led, performance-led retrofit and outcomes-focused targets and policies are woven into the very fabric of the Warm Homes Plan, helping to de-risk the journey to low energy, low emissions homes, for the consumer and for the Governments and underpin quality assurance.

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⁶ https://www.theeeig.co.uk/media/1147/eeig_tomorrow-s_homes_today_0224.pdf