SUBMISSION FROM THE GLASS AND GLAZING FEDERATION

1. The Glass and Glazing Federation (GGF) supports the Scottish Government in its efforts to cut carbon emissions, reduce fuel poverty and increase the energy efficiency of its housing stock.

2. The GGF is the main representative organisation for companies involved in all aspects of the manufacture of flat glass and products and services for all types of glazing, in commercial and domestic sectors. The GGF has approximately 500 members of all sizes who can be found in over 1,500 business locations throughout the UK.

The effectiveness of progress towards implementing the proposals and policies set out in the RPP1 and the appropriateness of the proposed adjustments to the proposals and policies within the RPP1

3. The GGF supports any proposals and policies which aim to encourage consumers to cut their carbon emissions by installing energy efficient glazing; therefore any move towards this in RPP2 is welcomed.

The effectiveness of the proposals and policies with the draft RPP2 for meeting the annual emissions targets

4. The GGF agrees with the view expressed in the report that there are major opportunities outside renewable energy to help improve the energy efficiency of the residential and industrial sectors, reduce fuel poverty in households and improve productivity and resource efficiency for businesses.

5. The GGF believes that the retrofitting of Energy Efficient Windows has a significant role to play in reducing carbon emissions from domestic and non-domestic buildings. A number of trials carried out for the Green Deal scheme, proved that windows are popular with consumers, and consumers should therefore be encouraged to adopt a “whole house” approach when installing energy efficient measures. For example, there is much interaction between solid wall insulation (SWI) and windows, as to undertake SWI work correctly the windows should be replaced or the existing windows removed and reinstalled on wider projection sills and possibly external linings. To not undertake this work correctly thermal bridging could occur, and potentially water ingress into the structure, thus creating major problems in the building fabric. It would therefore be a sensible and efficient approach to upgrade new windows and doors at the same time that SWI is installed.

6. Given their popularity with consumers and energy efficient benefits, the essential role that windows have to play in reducing energy use and carbon emissions from homes is evident and building regulations and planning guidance should support this.

How these proposals and policies are likely to contribute towards the achievement of the interim target, the 2050 target and, in each target year, the domestic effort target;
7. Please see above for information on how the GGF’s suggested proposals would contribute towards the achievement of these targets.

The appropriateness of the timescales over which the proposals and policies within the draft RPP2 are expected to take effect

8. The GGF believes that the Scottish Government should be bold in their aspirations for cutting carbon emissions and encouraging householders to improve the energy efficiency of their windows is something which will have a significant effect on this. The GGF is supportive of moves to implement energy efficiency measures as soon as is reasonable and practically possible.

9. We are in agreement that there should be a suitable lead time in between consulting on draft regulations and the application of any standards to allow time for householders, landlords and industry to prepare for the changes.

For further information please contact Nigel Rees, Group Chief Executive of the Glass and Glazing Federation for further information: Glass and Glazing Federation, 54 Ayres Street, London, SE1 1EU Tel DD: 020 7939 9113 or via email on nrees@ggf.org.uk