

Ariane Burgess MSP
Convener, Local Government, Housing and Planning Committee
The Scottish Parliament
Edinburgh EH99 1SP

6 February 2026

Dear Ariane,

Energy Performance Certificate Reform

I am writing to update the Committee on progress in implementing the Energy Performance Certificate (EPC) system.

A part of its consultation on the Home Energy Model, published alongside the Warm Homes Plan, the UK Government has stated that it recognises that the timeline for delivering new EPCs from October 2026 is “ambitious”. As you are aware, the new EPC system is to be underpinned by HEM.

The Property Energy Professionals Association has also written to me and although they are fully supportive of the ambition to introduce reformed EPC this year, they have expressed concerns that lack of clarity from the UK Government on the technical details of HEM is impacting the sector’s ability to train assessors ahead of introducing such significant changes.

As a result, I now have concerns about the risk of a delay to the operation of the Energy Performance of Buildings (Scotland) Regulations 2025, as they are reliant on the UKG programme progressing as planned.

At the time of laying the regulations and during Parliamentary scrutiny, I had no indication of any risk of delay to the UK Government’s published timeline. As I set out to the Committee during its scrutiny, our work on EPC reform is covered by the Memorandum of Understanding (MoU) between the UK Government and the devolved administrations, under which I received written assurances in August about the intention to deliver to the planned timescale.

As our regulations became law, I sought further written assurances from the Minister for Energy Consumers following several delays to the publication of the Warm Homes Plan, which I expected to include an update on HEM. I received a response in January which confirmed that no ministerial decision had been taken in relation to a delay to HEM.

My officials are therefore engaging with their counterparts and industry to clarify the situation. I raised this issue at the inter-ministerial group on Heat in Buildings on 26 January, and I have requested an urgent meeting with the Minister for Energy Consumers and the Minister for Building Safety, Fire and Democracy who share responsibility for EPC Reform in the UK Government, to discuss how we best progress work to an achievable timeline.

I am continuing to seek clarity and will write again to you in due course, in this regard.

Yours sincerely,

Màiri McAllan
Cabinet Secretary for Housing