

# **Correspondence from the Cabinet Secretary for Housing to the Local Government, Housing and Planning Committee, 9 March 2026**

## **Update on Energy Performance Certificate Reform & other Heat in Buildings workstreams**

I am writing to provide a further update to the Committee on progress in implementing Energy Performance Certificate (EPC) reform along with an update on subsequent implications for the Scottish Government's proposals for a private rented sector minimum energy efficiency standard (PRS MEES) and the development of the Social Housing Net Zero Standard (SHNZS).

### **Energy Performance Certificate reform**

The Energy Performance of Buildings (Scotland) Regulations 2025 were approved by Parliament in December. Provisions establishing the new Scottish EPC Accreditation Scheme and allowing the appointment of new Approved Organisations to oversee and train EPC assessors were brought into force on 1 January. The remainder of the regulations are due to come into force on 31 October 2026.

My officials have been working at pace to finalise the design and build of the new technical and operational infrastructure to underpin this. We have launched the Accreditation Scheme and invited new applications for Approved Organisations, to allow them to be appointed and ready to operate, prior to the remainder of the regulations coming into force. We are also completing the build of the new EPC Register that can interface with the UK Government's Home Energy Model (HEM) and 'Energy Calculation as a Service' (ECaaS) systems, which will act as the statutory calculation methodology required by the regulations.

In my letters of 6 and 18 February 2026 I notified you of my concerns about the risk of a potential UK Government delay to HEM and the impact this could have on bringing into force the remainder of the regulations, since they are reliant on the UK Government programme progressing as planned. This followed correspondence from the Property Energy Professionals Association (PEPA), who represent the EPC assessor industry, expressing their concerns about such a delay and the need for a revised timeline.

I have written and spoken to UK Ministers at length over the past few months in an effort to secure clarity on the timetable for HEM and the UK Government's wider timetable for EPC reform, under the terms of the memorandum of understanding which covers our governments' work on EPCs. I met the UK Minister for Energy Consumers, Martin McCluskey MP and the UK Minister for Building Safety, Fire and Democracy, Samantha Dixon MP, on 3 March. During that meeting, and in a subsequent letter of 9 March, they confirmed that the UK Government was instead moving to a timeline to implement EPC reform in the second half of 2027. This is to allow the time needed for HEM and ECaaS to be finalised, and for the assessor industry to develop software and training for assessors to use the new system.

I regret to inform the Committee that this confirmation by UK Ministers of a delay to the EPC reform timeline and its underpinning technical infrastructure, means that the Scottish Government will need, consequently, to lay amending regulations to adjust the 31 October in-force date. At this point in time, however, UK Ministers are unable to commit to a new timeline, and it is likely to take several months of further discussion with industry and the Scottish Government before a credible in-force date during 2027 and shared implementation plan can be agreed.

Given the time needed for those discussions, and the impending Scottish election, I am therefore unable to give assurance to Parliament of the timeline for introducing our EPC reforms. I likewise cannot lay the amending regulations ahead of dissolution, since I would not be able to specify a new in-force date for the regulations and there is insufficient time remaining in this session.

I am therefore notifying the Committee that the next Scottish Government will be required to lay amending regulations early in the next parliamentary session, in order to update the in-force date. I have impressed upon UK Ministers the urgent need for certainty and secured their commitment to agreeing a new timeline by early August. Since there is limited parliamentary time available between June and 31 October, the amending regulations are likely to require Parliament's agreement to be considered on an expedited timetable.

### **Private Rented Sector Minimum Energy Efficiency Standard (PRS MEES)**

The Scottish Government has a longstanding commitment to improving the energy efficiency of our homes, both to reduce emissions from our buildings and to reduce poor heat retention in homes as a contributor to fuel poverty. In June 2025, the Government launched a consultation on introducing minimum energy efficiency standards for the private rented sector, with the intention of bringing forward regulations before the end of this Parliamentary session.

However, the delay to HEM will impact landlords' ability to obtain an EPC certificate which accurately reflects the new heat retention rating. I therefore have not considered it appropriate to introduce regulations requiring compliance with a minimum standard until this position is absolutely clear. It would not be fair or reasonable to expect landlords to upgrade homes to meet a standard which cannot yet be confirmed pending the availability of reformed EPCs.

I am grateful to those who responded to the consultation, and because of that feedback my officials are developing options for Ministers to consider post-election. For tenants, my expectation remains that landlords will be required to improve the energy efficiency of their homes in the coming years, delivering energy bill reductions in many cases. My officials will continue to engage with stakeholders until the situation is resolved.

### **Social Housing Net Zero Standard (SHNZS)**

As the committee are aware there was a public consultation on the SHNZS between November 2023 and March 2024, alongside the consultation on the Heat in Buildings Bill. As I stated in the evidence I gave to committee members on 07 October 2025,

there was a pause in progress to ensure that this work was sequenced properly with other changes such as EPC reform.

With the uncertainty around the timescales for implementation of the EPC reforms it is not currently possible to definitively finalise the SHNZS. However, my officials will engage with the Sector to discuss and resolve other issues that remain to be concluded before a Standard can be adopted. This should allow the next Government to make progress on the Standard once there is clarity on the timescales for EPC reform, should they wish to do so.

I hope that this update is helpful. I do not envisage any further substantive developments before the dissolution of Parliament.

Yours sincerely,

**Màiri McAllan**