LOCAL GOVERNMENT AND COMMUNITIES COMMITTEE

FUEL POVERTY (TARGET, DEFINITION AND STRATEGY) (SCOTLAND) BILL CALL FOR VIEWS

SUBMISSION FROM SUPERGLASS INSULATION LIMITED

1. Do you agree with the Scottish Government’s proposal to provide for a statutory target to reduce fuel poverty to no more than 5 per cent of Scottish Households by 2040.

Yes. Superglass agrees that a statutory target should be in place. Setting this target (and keeping to it) provides a goal to be met.

2. Do you agree with the Scottish Government’s proposals for a revised definition of fuel poverty?

Provided that the new definition of fuel poverty can be easily and accurately measured then we agree on the revised definition.

We do not have clarity on what impact the new definition may have on additional costs that the Scottish Government would incur through this new definition. This is something that the Government needs to understand.

3. Do you agree with provisions in the Bill requiring the Scottish Government to publish a fuel poverty strategy? Do you also agree with the consultation requirements set out in relation to the strategy?

Yes - I agree that the fuel poverty strategy should be published. This sets the long term aims of the government and can then be followed by the whole supply chain that will be required to deliver the government goals for fuel poverty. Clarity and consistency are very important for the Energy Efficiency supply chain, allowing businesses to invest (where required) to support the overall aims of that strategy.

Yes – I agree with the consultation requirements set out in relation to the strategy and have replied / will reply to future calls for evidence.

4. A draft fuel poverty strategy was published alongside the Bill on 27 June. Do you have any views on the extent to which the measures set out in the draft Fuel Poverty Strategy for Scotland 2018 will contribute to meeting the Government’s new target? Have lessons been learned from previous initiatives?

The 18 key points raised in the executive summary of the Fuel poverty strategy cover all key areas – delivery on which will drive results towards the new target. Consistency of
application and adherence to these 18 key points will be required to deliver on the overall goals. Changing or altering these points will only end with the supply chain losing confidence in the process and not investing to deliver on the aims and goals.

All energy efficiency measures should be supported by a “Fabric First” approach i.e. get the walls and roofs insulated to the highest standard possible (both economically and technically) before the adoption and use of Low Carbon Equipment.

Positive lessons should be taken from the success of Area Based Schemes where delivery of energy efficiency measures have been delivered for reasonable cost due to the proximity of each measure.

Lessons should also be taken from schemes that have not been successful due to the complexity of the scheme either in understanding or delivery. Processes that are simple to understand, to manage and deliver will deliver better results than those that are complex.

5. Do you have any views on the Scottish Government’s reporting requirements to the Scottish Parliament, as set out in the Bill?

Reporting every 5 years in detail for a project term of 20 years to 2040 is probably right. However, more regular reporting (at a high level) should also be completed to ensure that progress is managed on a regular basis. If the delivery against goals is slipping it would be wrong to only pick this up every 5 years – reducing the time that the government could react.