



Consumer Focus Scotland's response to the Department of Energy and Climate Change consultation on the Green Deal and Energy Company Obligation

January 2012

About Consumer Focus Scotland

Consumer Focus Scotland is the independent consumer champion for Scotland. We are rooted in over 30 years of work promoting the interests of consumers, particularly those who experience disadvantage in society.

Part of Consumer Focus, our structure reflects the devolved nature of the UK. Consumer Focus Scotland works on issues that affect consumers in Scotland, while at the same time feeding into and drawing on work done at a GB, UK and European level.

We work to secure a fair deal for consumers in different aspects of their lives by promoting fairer markets, greater value for money, improved customer service and more responsive public services. We represent consumers of all kinds: tenants, householders, patients, parents, energy users, solicitors' clients, postal service users or shoppers.

We aim to influence change and shape policy to reflect the needs of consumers. We do this in an informed way based on the evidence we gather through research and our unique knowledge of consumer issues.

The Green Deal and Energy Company Obligation

Consumer Focus Scotland Response to the consultation

Introduction

1. Consumer Focus Scotland (CFS) welcomes this opportunity to contribute our views on the Government's Green Deal consultation. We have contributed to the Consumer Focus response which provides detailed answers to specific questions; this paper is intended to provide support to that response by providing more detail on aspects of the proposals which are most relevant to consumers in Scotland.
2. Our response takes account of our ongoing work in support of consumer access to energy efficiency services, and also, more specifically, of the discussion at a well-attended stakeholder seminar on the Green Deal and Energy Company Obligation co-hosted by Consumer Focus Scotland and Energy Action Scotland in February 2011¹. That seminar, at which DECC officials presented the (then) emerging proposals for the Green Deal and Energy Company Obligation identified a number of key issues stakeholders thought would need to be addressed to ensure the success of the new programmes.
3. Points raised at that time included: issues around consumer protection and support; the involvement of trusted local organisations to increase take-up of measures, especially among vulnerable and disadvantaged consumers; designing the programmes so that they delivered for rural areas, and for the tenements and flats which form a high proportion of housing in urban Scotland; and more technical issues, such as revision of the RdSAP process to reflect Scottish buildings and climate.
4. To inform our response to the present consultation, CFS has:
 - Undertaken two focus groups with members of our consumer volunteer network², to explore in detail their views of the current proposals; and
 - Delivered three discussion workshops³ with a range of stakeholders, including local authorities and social and environmental NGOs who deliver energy efficiency and fuel poverty programmes under existing funding streams.
5. The sessions allowed us to explore consumer and stakeholder views of the Government's proposals. They also provided an opportunity to test views on

¹ Seminar report available at www.consumerfocus.org.uk/scotland/publications/report-of-green-deal-eco-seminar-2

² Over 500 people across Scotland are members of the network. Details are available at <http://www.consumerfocus.org.uk/scotland/consumer-network>

³ CFS staff ran discussion sessions at events for the Scottish HECA Officers Network, the North East Energy Efficiency Forum, in Aberdeen, and at an Existing Homes Scotland Alliance event. A total of over 70 stakeholders contributed their views.

the extent to which the concerns raised by stakeholders during the earlier seminar have been addressed.

6. In summary, Consumer Focus Scotland's views are that:

- We recognise that a step change in the energy efficiency of existing housing in Scotland, particularly houses with solid walls and without access to mains gas, is necessary to reduce both fuel poverty and climate change emissions;
- We consider that the Green Deal and Energy Company Obligation, if designed and delivered in ways which reflect the needs of Scottish consumers, can play a significant role in achieving these aims;
- We recognise that some of the technical questions raised by stakeholders in the earlier seminar have been addressed. We welcome, in particular, the commitment to revise the assessment process so that it reflects the prevailing climates across GB, and also the increased clarity on registration requirements for businesses to be involved in the Green Deal. However;
- While the Government's proposals will help address financial barriers faced by consumers interested in improving energy efficiency, further work detail is needed to address consumers concerns about promotion, engagement, delivery and redress in relation to the new programmes. This is particularly important given consumers' current lack of trust in energy markets;
- CERT funding has, and continues, to underpin the current Scottish Government energy efficiency programmes, the Energy Assistance Package and the Universal Home Insulation Scheme. It is critical for consumers in Scotland that the move to ECO, and new delivery structures, allow that integrated approach to continue. The UK Government should discuss this with the Scottish Government as a matter of urgency to ensure that services to consumers are maintained.

7. Two wider points have emerged consistently in our discussions with both consumers and stakeholders. These build on, but go beyond, the current consultation.

8. The first is around the attractiveness of the Green Deal to consumers. While current proposals in the consultation document identify both problems and solutions in relation to a number of consumer protection aspects of the Green Deal, the impression is that these are safeguards to provide redress when things go wrong. While such consumer protection is clearly essential, more needs to be done to develop a product which appeals positively to consumers, either by reducing costs, improving comfort, or both. We appreciate the Government's view is that it is the role of other sectors to create approaches which engage consumers; however, the key points which emerged from our discussions are included here in the hope that they may help the Government and others develop more detailed packages which are attractive to consumers.

9. The second point is that the overall scale of fuel poverty in Scotland means that further resources, beyond those currently identified under the ECO and existing Scottish Government programmes, will be needed to assist fuel poor consumers. As the consultation recognises, these consumers are very unlikely to be able to pay for energy efficiency measures through the Green Deal. Consumer Focus is calling for the revenues from future carbon taxes, such as

the EU Emissions Trading Scheme, to be used in this way, to increase substantially the resources available to assist fuel poor consumers.

10. The remainder of this response provides further detail on the key points above.

Context: Energy Efficiency and Fuel Poverty in Scotland

11. The Scottish House Condition Survey⁴, published annually by the Scottish Government, is the most comprehensive source of trend data on energy efficiency and fuel poverty in Scotland. The most recent survey, published in December 2011 and based on 2010 data, shows that recent improvements in the average energy efficiency of the Scottish housing stock are continuing. While these improvements are very welcome, they have not, however, been sufficient to offset the impacts of sharply rising energy prices.
12. The number of households experiencing fuel poverty is therefore rising. Although the most recent survey shows a slight fall in fuel poverty from 2009 to 2010, the Scottish Government's updated figures⁵ also show that 35% of all Scottish households were estimated to be fuel poor when the autumn 2011 price rises were taken into account.
13. The data also show that progress in terms of energy efficiency has been stronger in some housing sectors than in others. Positively, increases in minimum standards of energy efficiency required in new housing have clearly delivered benefits, and modern houses are significantly more energy efficient than older houses. In addition, the regulatory approach taken through the Scottish Housing Quality Standard, which applies to housing owned by social landlords, has also delivered significant improvements in the energy efficiency of both new and existing social housing.
14. The trends in take-up of basic insulation measures, such as loft and cavity wall insulation supported through CERT, have also been positive. For example, the number of lofts in Scotland which have no insulation at all is now estimated to be only 46,000 (3% of those which could be filled), although a further 1,080,000 more houses have loft insulation at levels which are low by today's standards.
15. An estimated 544,000 houses (38% of those with cavities) are still thought to have unfilled cavities, although the survey notes the difficulty of identifying situations where such insulation would not be suitable due to prevailing weather, or has already been installed⁶.
16. Stakeholders also note that, as the majority of easy installations of basic measures have been carried out, challenges now are increasingly around engaging hard to reach consumers to take up these measures, or in providing financial support for those unable to pay, but who do not qualify for free measures through passport benefits. This experience is reflected by all of the big six energy companies, who have said that they face difficulties in meeting their Super Priority Group targets under CERT⁷.

⁴ Scottish House Condition Survey, available at

<http://www.scotland.gov.uk/Topics/Statistics/SHCS>

⁵ Available at <http://www.scotland.gov.uk/Resource/Doc/997/0123084.pdf>

⁶ Scottish House Condition Survey, tables 8, 9 and 10

⁷ Discussion at Scotland Office Energy Summit chaired by Secretary of State Michael Moore, October 20th 2011

17. Evidence shows that area-based schemes, working through trusted local organisations can provide a solution to this problem. The Scottish Government's Universal Home Insulation Scheme (UHIS)⁸, which provides free basic measures to all consumers, targets areas thought to have higher levels of fuel poverty, has proven successful in installing basic measures to consumers who had not responded to other approaches.
18. In addition, by working on a door-to-door basis through trusted local organisations, the scheme has helped identify and engage consumers eligible for higher levels of support through the Energy Assistance Package (EAP)⁹. Similarly, area-based projects supported by the Climate Challenge Fund have generated higher levels of engagement than those which rely on consumers to contact a central number.
19. In urban areas, the UHIS has the additional benefit of addressing the long standing problem caused by mixed ownership of blocks of flats where loft or cavity wall insulation is technically possible, and where agreement by all owners is needed before measures can be installed. Lack of agreement creates a barrier, which is particularly acute where there are mixed tenures in a single block, including the private rented sector.
20. The Scottish House Condition Survey also shows that other challenges remain. In particular, improvements in the energy efficiency of existing private sector housing, both owner-occupied and privately rented, have been slower, and from lower bases, than in social housing. Less energy efficient houses are increasingly those which lack basic energy efficiency measures – and for which loft and cavity insulation are not suitable options - are older, detached, and off the mains gas grid.
21. These houses are more commonly found in rural areas, and this is reflected in rates of fuel poverty which are consistently higher in rural areas than in urban Scotland. Energy efficiency measures for these homes are typically much more expensive, as they require insulation of solid walls and combed ceilings, often in combination with low carbon or renewable heating systems.
22. These higher costs for rural houses are part of the reason that Scottish Government figures show a considerable gap between energy efficiency costs and current spending needed to meet the 2020 climate change emission reduction targets from housing. The figures show that £3.4bn¹⁰ would be needed, over and above current spending by Government, energy companies and consumers. It is likely that reducing climate change emissions to meet the 2020 target would also have a significant positive impact on reducing fuel poverty.
23. The balance between different insulation measures was one of the issues we explored in discussion with stakeholders. Following from the above, there is clear evidence that the transition away from basic loft and cavity insulation and towards solid wall insulation is appropriate. However, stakeholders are concerned at the speed of change implied by the current consultation proposals. We believe that a more staged approach would be appropriate, so

⁸ Outline of the Scheme available at www.scotland.gov.uk/Topics/Built-Environment/Housing/warmhomes/uhis

⁹ Details available at www.energysavingtrust.org.uk/scotland/Take-action/Grants-and-offers/Home-Energy-Scotland/Energy-Assistance-Package

¹⁰ Meeting the Emissions Reduction Targets 2010-2022: The Report on Proposals and Policies, available at www.scotland.gov.uk/Publications/2011/03/21114235/0

that spending on loft and cavity insulation falls more gradually, while investment in solid wall insulation, and on other techniques suitable for hard to treat houses, is built up at rates which allow the industry to adapt. Given the situation described above, it would also be appropriate for loft top-up to be eligible for support through ECO.

24. In summary, the evidence shows that:

- Despite significant improvements in the average energy efficiency of Scottish housing, energy prices have risen to the extent that levels of fuel poverty have risen significantly in recent years;
- Progress has been strongest in improved standards for new build housing, and in the social housing sector, driven by the Scottish Housing Quality Standard;
- Increasingly, challenges can be characterised as either (or both) engaging consumers who have not to date considered energy efficiency, or of installing insulation and heating systems in older existing homes, particularly those with solid walls, combed ceilings, or which do not have access to mains gas. All of these are more common in rural areas.
- The high proportions of flats and tenements in urban Scotland, especially where different tenures are involved, adds another barrier to take-up of energy efficiency measures, as agreement for measures is needed from all owners before work can be carried out; the provision of basic measures without charge has been most effective in overcoming these barriers.
- The scale of existing energy efficiency and fuel poverty programmes is not sufficient to meet existing Government targets to reduce either fuel poverty or climate change emissions.

25. It is clear that current activity, while clearly bringing benefits for many consumers, is not sufficient to deliver the step change which is needed. Consumer Focus Scotland therefore believes that the new Green Deal and Energy Company Obligation have the potential to help increase access to energy efficiency measures for many consumers.

26. At the same time, the levels of fuel poverty in Scotland are such that the new programmes, even combined with current Scottish Government spending, are unlikely to be sufficient to meet the full range of challenges outlined above. Consumer Focus has called for the EU Emissions Trading Scheme funds, which will increase consumers' bills further, to be re-directed to address fuel poverty.

Consumers' Views of the Green Deal

27. The different stages of the Green Deal process are clearly summarised in the consultation document. After discussing the background material covered above, Consumer Focus Scotland used these stages as the basis of discussions with consumers, to test their views on what barriers might arise, and also to help identify ways in which the propositions to consumers could be made more attractive. The results of the focus groups were then used as the basis for discursive presentations to stakeholders, all of which covered:

- Marketing and engagement
- Assessment and the production of a report identifying suitable measures and savings

- Getting quotes from providers
- Having the work carried out
- Options available to finance the work, including views of the charge on the electricity bill for an agreed period
- Redress and consumer safeguard arrangements, together with the availability of independent advice alongside the above process
- Making the Green Deal attractive to consumers

28. The sections below provide details against these headings. In addition, a final section, taking account of discussion with stakeholders, provides suggestions for making the Energy Company Obligation as effective as possible in Scotland.

Marketing and Engagement

29. We explored consumers' views on the organisations they thought best placed to engage them in discussions about the Green Deal. All the consumers involved expressed a preference for initial approaches to be made through trusted organisations with which they already have contact; these included local authorities, local and national NGOs, and local traders (builders, electricians, etc).

30. There was a notable antipathy towards marketing by energy companies¹¹. The prospect of cold calling on the doorstep was viewed very negatively. There were two reasons for this; firstly, given the level of financial and organisational commitment implied by large scale energy efficiency work, a much more professional approach was thought to be needed. Secondly, many participants had poor previous experience of doorstep sales by energy companies, or were familiar with friends or family who had had such experiences.

Assessment and Production of Green Deal Report

31. Following from the above discussion, consumers in our groups were most concerned about the independence of assessors, and their relationships with the companies who would eventually make profits by selling measures and financial packages. Worries about mis-selling were at the heart of these concerns; consumers felt strongly that advisers employed by the public or voluntary sectors would be more likely to recommend measures purely on the basis of energy efficiency, without financial issues affecting their recommendations.

32. It is also critical that all assessors, regardless of the organisation in which they are based, have a duty to identify all potential sources of funding for energy efficiency available to consumers.

33. Consumers had mixed views about the way in which the lifestyles of individual households would affect the assessment process, and by extension, the golden rule. Clearly, savings from insulation in the same house will differ depending on the levels of heat currently required by the occupants, and this was a particular concern for consumers taking over a house which had had green deal work carried out. For example, a couple buying a house in which

¹¹ This is consistent with data showing that consumers have low levels of trust in the energy sector. www.consumerfocus.org.uk/scotland/publications/consumers-and-the-market-for-gas-and-electricity-in-scotland

solid wall insulation had been installed on the basis of the heating needs of an elderly person, could find that the golden rule was not met if the new occupiers' energy needs were significantly lower. This emphasises the importance of clarity about the green deal arrangements at the point of sale or rental.

34. Following from this, consumers suggested that the Green Deal would be more attractive if (as suggested as an option for the first year in the consultation document) a safeguard was built in to make even limited levels of savings more likely from the start of each Green Deal.
35. More positively, consumers liked the prospect of a simple report which provided illustrative financial savings, using the familiar A-G coloured diagram. While agreeing with this, stakeholders with a more technical background also highlighted the importance of the methodology which is used to generate the EPC reflecting climate and also the different types and thermal performances of solid walls which are found in Scotland¹².

Getting Quotes from Providers

36. Our focus group participants were very negative about the possibility of their assessment reports being available for any provider to view, as is currently suggested in the consultation document. They felt that such an approach would mean that they, as householders, would be subject to a barrage of sales material. Rather, they suggested that the assessment report should be accompanied by a list of providers available in their area, and it should be up to the consumer to identify and contact the providers of their choice.
37. In a linked point, participants also suggested that payment mechanisms for assessors could be put in place to improve confidence. For example, assessors could be paid by whichever provider is eventually selected by the consumer to arrange their Green Deal. This would reduce the risk of mis-selling.

Having the Work Carried Out

38. Given the potentially long period and large scale of the Green Deal loan, trust in the installers and in their ability to respond quickly to maintenance or repair requests was critical for our consumers. The ability to choose trusted local businesses was seen as very important to meet these criteria, but consumers were concerned that some Green Deal providers might tie them to particular businesses not based in the area.

Options for Financing Measures

39. Our participants recognised that the current proposals offer a wide choice of financing arrangements, and the majority of issues they raised are already answered by current proposals. The commitment to the golden rule, with the reservations noted above, was welcome too, albeit that it required some explanation before its meaning became clear to consumers.
40. Similarly, the idea of an energy efficiency loan being recovered through a charge attached to the electricity meter was easy for consumers to understand.

¹² CFS has responded to a Scottish Government Building Standards Division consultation on this issue. www.consumerfocus.org.uk/scotland/publications/responses

41. The main outstanding questions raised were around the scale of any penalty for early payback of the Green Deal, and the interest rates to be applied.
42. The first of these relates mainly to the interaction of the Green Deal with the house buying / selling process. There was an expectation among our participants that all loans associated with a house would normally be cleared at the point of sale. As a result, our group members wanted to have this option, either when selling (to make the house more attractive to buyers) or when buying (to clear an outstanding loan on which they would otherwise be paying interest). Their view was that any penalty for early repayment should be low and / or capped to facilitate these options.
43. All participants told us that a low interest rate would be critical to ensure the success of the Green Deal. In addition, their view was that the interest rate should be fixed, rather than pegged to energy costs, given the considerable variations seen in energy prices in recent years. A specific question about variable interest rates was also raised by stakeholders working with low income consumers. Their concern was that low income consumers could be more likely to have poor credit histories, and to face higher interest rates as a result, even if they have a good record in terms of payment of energy bills. This would limit the participation among consumers for whom cost savings would potentially bring greatest benefit.

Independent Advice, Consumer Protection and Redress

44. Consumers welcomed the commitment to an independent advice service being available. However, given the complexity of the process, they wanted the advice service to cover financial aspects of the Green Deal and ECO, for example on the costs and benefits of different measures, as well as energy efficiency questions. This would represent an extension of the existing advice service in Scotland, currently delivered through Energy Saving Scotland Advice Centres (ESSACs).
45. Stakeholders, including one ESSAC manager, recognised the benefits to consumers of this approach, but noted that the range of skills and qualifications needed for an expanded advice service would be considerable. There was some concern that it could, as a result, be difficult to identify suitable staff. Further, stakeholders also noted the difficulties of giving detailed technical advice over the phone, especially in relation to more complex questions around different types of solid wall insulation or renewable heating systems.
46. The response of consumers to the wider consumer protection proposals was generally positive. They recognised that the consultation proposals (authorised installers, warranties, payment terms linked to the lifetime of measures, etc) addressed the majority of their concerns about safeguarding consumers.
47. Where questions remained, they related mostly to the remit of the proposed oversight body, and the extent to which it will be able to resolve complaints. Given that the Green Deal discussion was new to consumers, however, they were understandably not able to give examples of possible problems they thought might occur.

Making the Green Deal Attractive to Consumers

48. Successful delivery of the Green Deal clearly depends on consumer confidence and trust. The Consumer Focus consumer confidence survey in

2010¹³ found, as in previous years, that consumer confidence in the energy and housing markets and in home maintenance services is lower than in other markets. These concerns are reflected to some extent in the discussions above.

49. The current consultation document identifies many problems which could face consumers and, in many cases, also identifies solutions. However, the overall feedback from our focus groups was that the proposals, while welcome, are intended to help safeguard consumers should things go wrong. The proposals do not, as yet, present consumers with an attractive and engaging proposition. Only a very small minority of consumers, at the end of the discussions, thought that they or their friends or family would be interested in taking up the Green Deal.
50. To overcome this, we believe that the delivery of the Green Deal must reflect consumers' concerns, so that, in addition to the safeguards already outlined:
- Early engagement of consumers, particularly of vulnerable and disadvantaged consumers, makes use of organisations, such as local authorities, NGOs or local businesses, trusted by them at the community level.
 - It is also critical that those responsible for engaging consumers, or for carrying out assessments, have a responsibility to identify all possible sources of financial assistance for energy efficiency which could be available, including public sector grant support as well as commercial offers through the Green Deal;
 - The Green Deal proposal is attractive and easy for consumers to understand; delivery of savings from the start was seen as critical by our participants;
 - There is meaningful choice for consumers at all appropriate stages of the process, including the choice not to approach certain Green Deal providers, and to make use of local businesses at the point of installation;
 - Options to pay back Green Deal finance are as flexible as possible, and attract only minimal penalties;

Making the Energy Company Obligation Effective in Scotland

51. As set out in the sections above, current levels of fuel poverty in Scotland are thought to be around 35%. Green Deal finance is unlikely to be suitable for these consumers, because they are likely to be under-heating their homes at present. It is clear that there are challenges engaging with some fuel poor consumers, who are currently eligible for free basic measures, and also that there is a clear need for support for energy efficiency measures suitable for hard to treat and off gas houses. The overall twin focuses of the Energy Company Obligation on affordable warmth and carbon reduction, primarily from the use of solid wall insulation, are therefore welcome.
52. It is also important, though, to note that CERT currently underpins both the Scottish Government's programmes (Energy Assistance Package and Universal Home Insulation Scheme). The detailed arrangements for ECO will be critical to ensure that these programmes continue to deliver for fuel poor

¹³ Briefing available at www.consumerfocus.org.uk/scotland/publications/consumers-and-the-market-for-gas-and-electricity-in-scotland

consumers. Stakeholders are therefore concerned that the abrupt change from support for loft and cavity insulation towards solid wall insulation, as currently proposed, will not be effective. There is a general consensus that a sharp change will reduce the number of basic insulation measures which can be delivered, but, at the same time, it will take some time for the industry to start to deliver significantly more installations of solid wall insulation.

53. There are also clear concerns among Scottish stakeholders that ECO funding will not reach remote rural areas, where delivery costs are higher. We appreciate, and welcome, the adaptation of RdSAP to reflect climate, based on latitude. However, whether this approach will be sufficient to encourage take up in rural Scotland depends very much on the detail of measurement, and stakeholders have raised the further issue that climate and heating needs also vary by altitude. There will also be additional transport costs for island communities.
54. A final point relates to the use of low carbon and renewable heating systems in off gas areas. Consumer Focus Scotland will shortly publish a report summarising the experience of social landlords in delivering affordable heat in off gas areas. The research takes account of the views of both social landlords themselves and of tenants, and shows clearly that renewable heating systems can and do help address fuel poverty and significantly cut carbon emissions, when combined with appropriate insulation.
55. However, it is also clear from our report that higher levels of support are needed to help tenants get the best from their new systems, especially in the early stages when technologies are new to everyone involved. In addition, the total costs of installation and support are much higher than for the installation of a new gas boiler. Delivery of the ECO must take account of both the additional costs and support needed, and must be integrated with the Renewable Heat Incentive, if it is to be effective in off gas areas.
56. We would therefore recommend that:
- Given the scale of fuel poverty, the carbon saving as well as affordable warmth strands of ECO should aim explicitly to reduce fuel poverty through energy efficiency measures; targeting the installation of solid wall insulation towards social landlords is likely to help achieve both fuel poverty and carbon aims, while at the same time helping build industry capacity. Integration between the ECO and the RHI in off gas areas is also critical to offer a whole house package;
 - Geographical criteria should be introduced from the outset to ensure ECO is delivered in rural and remote areas. In addition, the geography of delivery of ECO funding should be transparent, so that it is clear whether (as the Government believes will be the case) spending is indeed delivered proportionately in rural and remote areas;
 - Given the high level of integration between CERT and Scottish Government energy efficiency programmes, it is critical that ECO should be designed in ways to facilitate integration with these programmes so that services for consumers are maintained. The UK Government should agree how best to achieve this with devolved authorities as a matter of urgency;
 - To ensure an integrated service for fuel poor consumers, ECO delivery should be accompanied by, but should not directly be used to fund, other

essential energy services suitable for fuel poor households, including benefit checks, energy tariff checks, and other social programmes.

57. Two wider points have emerged consistently in our discussions with both consumers and stakeholders. These build on but go beyond the current consultation.
58. The first is around the attractiveness of the Green Deal to consumers. While current proposals in the consultation document identify both problems and solutions in relation to a number of consumer protection aspects of the Green Deal, the impression is that these are safeguards to provide redress when things go wrong. While such consumer protection is clearly essential, more needs to be done to develop a product which appeals positively to consumers, either by reducing costs, improving comfort, or both. We appreciate that the Government's view is that it is the role of other sectors to create approaches which engage consumers; however, the key points which emerged from our discussions are included here in the hope that they may help the Government and others develop more detailed packages which are attractive to consumers.
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