



11 August 2006

Ms Michelle Williamson
Scottish Building Standards Agency (SBSA)
Almondvale Business Park
Denholm House
Livingston
West Lothian
EH54 6GA

By e-mail

Dear Ms Williamson

**SBSA – 2006 Consultation: 15 May to 11 August
Proposed Implementation of Articles 7, 8 and 9 of the EU Directive (2002/91/EC)
on the Energy Performance of Buildings**

This consultation response from Homes for Scotland makes reference to the earlier and wider public consultation closing 26 May 2006.

Homes for Scotland relies on the responses from individual member companies, as industry practitioners, to provide the detailed technical response requested by SBSA in relation to specific questions.

In our response of 26 May to the earlier consultation we responded under Section 6: Energy and Section 3: Environment as follows:-

“6.9 Energy performance certificate

Notwithstanding the separate recently opened SBSA consultation on this item the proposal to impose the provision of this certification on the home seller is unacceptable due to potential unfair claims of property misdescription.”

As for consideration of this current consultation it is noted in terms of timetable for implementation of the “Single Survey” that in England and Wales it has been dropped for the foreseeable future no doubt for reasons which are no less relevant in Scotland. It is assumed that the Scottish Executive weblink to the “Single Survey”, quoted in the

SBSA consultation document, is no longer available as a consequence. It is a general concern set by precedent that in the introduction of new requirements an adequate timescale is allowed for the appropriate resources to be in place in time for industry to meet those requirements.

Member concerns which have been brought to our attention include cost of certification and registration and also adequate but flexible training and accreditation of those responsible for future certificate issue.

As requested the completed Homes for Scotland Respondent Information Form is returned with this letter.

Yours sincerely

David Little
Head of Technical Services