



Display Energy Certificates: current regime and how it could be streamlined and improved

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Consultation response from the Environmental Association for Universities and Colleges (EAUC)

About us

The Environmental Association for Universities and Colleges is the sustainability body for tertiary education in the UK. The EAUC seeks to work with Members and partners to drive sustainability to the heart of further and higher education.

The EAUC Vision is a university, college and learning and skills sector where the principles and values of environmental, economic and social sustainability are embedded.

Our Mission is that we will lead, inspire and equip Members and stakeholders with a shared vision, knowledge and the tools they need to embed sustainability within curriculum and operations.

Our Membership is made up of **215** Member institutions (Universities and Colleges across the UK and internationally) comprising some **4,216** professionals.

Our Response

The EAUC welcomes this opportunity to respond to this consultation on behalf of our Members. This response has been collated by the Convenors of the EAUC Energy Community of Practice (CoP), **Andrews Bryers, Energy Manager, Aston University** and **Joel Cardinal, Head of Energy & Sustainability, The University of Warwick**, and includes comments from Members of the CoP. We are grateful to them for their help.

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Part 1

Question 1 - How could the existing enforcement regime be improved?

There is no evidence that DEC's are enforced and this should be improved. Furthermore, there needs to be an imperative to act if the rating for a building is below a D.

Question 2 – How may the barriers to enforcement be overcome?

The current enforcement, or lack of, should be reviewed and some enforcement measures made as there are still large numbers of public buildings without DEC's. The fines should be kept by the enforcing body as an incentive. Although, we do recognise complying to DEC could be expensive for some institutions.

Question 3 - Who should be the enforcement body for the display of energy certificates in public buildings regime, and why?

Potentially local authorities - but then someone must enforce the system on them.

Part 2

Question 4 – Should the existing system of Display Energy Certificates and recommendation reports remain unaltered?

Yes. (There needs to be a review on DEC's for buildings less than 1000m² as the current renewal of such DEC's is too long, especially for high energy consuming small buildings. Perhaps, their renewal should be linked to their consumption?). It is also noted that definitions could be improved to reduce the margin for interpretation.

Question 5 – Should the exemptions from the requirements of the Directive be applied to qualifying buildings for Display Energy Certificates?

No. This scheme should be extended and not reduced for example, in schools.

Question 6 – Should those buildings that have and display their Energy Performance Certificate be exempt from the requirements to have a Display Energy Certificate?

No. EPC's do not account for energy consumption driven by behaviour within buildings, and hence could not be used to promote behavioural change. Also, they do not account for unregulated loads, and hence do not tell the 'whole story'.

Question 7 – Should an energy certificate be required when 500m² is occupied by public authorities and frequently visited by the public?

Yes, but not if it's an EPC. If DEC's are to be abolished, we see no value in requiring an EPC to be displayed.

Question 8 – Should the validity period of all Display Energy Certificates and their accompanying recommendation reports be five years?

No. An increase from an annual review would reduce the value of such a scheme. We would advise against this move. Organisations are given the opportunity to gauge the current year's performance against previous years, and in so doing determine whether energy consumption is moving in the right direction. Five year reviews may mean organisations' not seeing increases in consumption until it's too late, if DEC's were their only review of building usage.

Question 9 – Should the validity period of all Display Energy Certificates and their accompanying recommendation reports be 10 years?

No. See answer to Question 8.





Question 10 – Should the Display Energy Certificate regime be altered in the way outlined above?

No.

Question 11 – Should the mandatory Display Energy Certificate regime be abolished?

No. A voluntary scheme would reduce the number of participants and be counter intuitive to the wider goal of meeting EU emissions targets.

Question 12 – If Display Energy Certificates were no longer a statutory requirement, would you still obtain one (for example in order to monitor the energy efficiency of any non-dwelling)?

This would depend on the institute, as for some, they can be an excellent management tool and incentive to take action.

Question 13: Which proposal (or combination) is your preferred outcome?

Option 0, (do nothing – no regulatory changes required) with a duty to take action if the DEC score is low.

[View the consultation here.](#)

We appreciate the opportunity to respond to this Consultation.

Iain Patton
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