

Technological Innovations and Climate Change: Heat Pumps Inquiry

<https://committees.parliament.uk/work/684/technological-innovations-and-climate-change-heat-pumps/>

This inquiry is currently accepting evidence until **Friday 6 November 2020**

The Environmental Audit Committee (EAC) has today announced that it will look at electrical, gas and hybrid heat pumps, marking the next phase of its Technological Innovation and Climate Change inquiry.

Heat pumps transport heat from one location (such as the air outside) to another (such as a hot water system inside) using a small amount of external energy, which is often electricity. The technology could play a major role in decarbonising heat, which in domestic, industrial and commercial settings currently accounts for over a third of the UK's greenhouse gas emissions. The Committee on Climate Change has said that to meet the commitment to reach net-zero by 2050, 19 million heat pumps will need to be installed and that hybrid heat pumps should be widely used by 2035.

The Prime Minister has recently spoken on the role ground-source heat pumps could play in the 'green industrial revolution', and in its report, 80% of Climate Assembly UK members agreed that heat pumps should play a role in getting the UK to net-zero.

However, there are current limitations to rolling out the technology. For example, heat pumps are currently more expensive than conventional options such as gas-fired boilers. A report, published last week by the UK Energy Research Centre, highlighted record sales of gas boilers last year, with current rates suggesting it will take 700 years for the UK to move to low-carbon heating. Electrical grids would also need to be significantly expanded to facilitate the extra capacity that electric heat pumps would require.

Environmental Audit Committee Chairman, Philip Dunne, said:

"If the UK is to reach net-zero carbon emissions by 2050, we need to accelerate the rolling out of technologies that can get us there. The purpose of the Committee's work in this area is to examine whether new, low-carbon technologies can keep the lights on and our homes warm.

"Heat pumps are playing an increasingly significant role in decarbonising heat in other countries. I look forward to the Committee examining why this has yet to take off across the UK, hearing from the sector on whether rolling out heat pumps is feasible at scale and what barriers exist to wider adoption. We hope our findings can help inform the Government's Heat and Buildings Strategy as it pioneers the course of the new Green Industrial Revolution."

The Committee will be considering these issues, and more, before sharing its findings and recommendations with Government on the role heat pumps can play in reaching net-zero.

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MCS Charitable Foundation

Our vision is a world where everyone has access to affordable and reliable renewable energy and low carbon technologies – for the benefit of our environment, our communities and the general public. As a Foundation we work to increase public confidence, awareness and access to renewable energy and low carbon solutions across the UK. We support education and engagement programmes, fund research and facilitate innovative solutions to drive widespread adoption. In addition, the Foundation oversees the [Microgeneration Certification Scheme \(MCS\)](#) which defines, maintains and improves quality standards for renewable energy at buildings scale.

MCS Service Company Ltd (MCS Certified)

Since 2008, MCS has been the only recognised Standard for UK products and their installation in the small-scale renewables sector. It is a mark of quality. We create and maintain standards that allows for the certification of low-carbon products and installers used to produce electricity and heat from renewable sources. We are impartial: technology neutral, manufacturer neutral, and supportive of Installers committed to quality installations and consumer protection. Membership of MCS demonstrates adherence to recognised industry standards; highlighting quality, competency and compliance. Our mission is to give people confidence in low-carbon energy technology by defining, maintaining and improving quality.

MCS Evidence:

1. What steps can the Government take to increase uptake of heat pumps?

- 1.1. Removing VAT from all domestic renewables (including heat pumps) as well as the installation costs and setting the rate at 0%, so Zero carbon = zero VAT for a period of 10 years. This will remove a complex VAT system, variable rates and depends on if whole heating installations are part of the installations so rates will vary from 5% through to 20%. This will help increase the uptake of heat pumps across domestic and business sectors. Currently VAT rates vary from 5% for renewables to 20% on PV panels, and 5% on gas, 5% on heat pumps and 20% installation costs outside of scheme or if the renewables are considered to be part of a whole heating system then 20% VAT would apply. Simplify the VAT rules on renewables and include installation and the heating system associated with renewables as the same and exempt from VAT for 10 years.
- 1.2. If the Government is serious about increasing the uptake of heat pumps then as a matter of urgency it needs to change the Planning Regulations, so that there is a requirement for heat pumps to be installed as the primary heating method in all new homes from March 2023 and that Gas and Oil are prohibited for heating also from March 2023. This will force a shift in the market place to allow heat pumps to become the norm. Having such regulations will help create a new and consistent market with up to 300,000 new homes being built every year and installed with heat pumps. It will provide the opportunity to invest in businesses, improve manufacturing supply chains and allow the upskilling of the workforce creating new jobs and allow installers to become MCS certified. It is also vital that any installation of heat pumps is conducted to the highest standards and covered under the MCS assurance scheme as is standard for any current Government incentive scheme. MCS provides the quality assurance and customer confidence in the new technology and prevents substandard and poor installations which would damage the heat pump market. These planning regulations need reviewing e.g. Part L in relation to technologies and low carbon solutions to make sure standards required reflect changes in technology to heat pumps.
- 1.3. The Government needs to proactively raise awareness of heat pump technology as a viable alternative heating system and start informing consumers that as part of a low carbon future that fossil fuels will be phased out. There is also a need to make consumers aware in advance of alternative heating systems, like heat pumps, during annual service of existing gas/oil boilers and help prepare for changes and to think ahead when installing their next system, rather than reacting to a boiler failure. Government information is vital and a need to standardise and update information on an annual basis, so the information is consistent and high quality across the UK.
- 1.4. The Government as a matter of urgency needs to introduce a phase out date of March 2023 for gas and oil heating within new homes, as recommended by the Committee for Climate Change and to publicise this date in advance. This signal gives time for the boiler industry to retrain to new business models and stimulate the production of the heat pump manufacturing in a sustainable way. It is also important that the Government start communicating a clear date when all gas and oil fired boilers should

have been replaced in existing homes e.g. 2040, to be replaced with technology like heat pumps.

- 1.5. Subsidies and incentives are also important in the next five years to help early adoption of the technology, but will only take us so far. New legislation and regulation is the only way that a substantial shift in the market will take place and allow the uptake of heat pumps.
- 1.6. Learn the lessons from other countries to help increase the uptake of heat pumps eg Government loans at 0% interest rates in Sweden, Germany, Austria and in Scotland. The use of integrated departmental planning and heating policies across Government to help establish heat pump technology as the norm. Without the Government prioritising the issue and providing the right regulations, incentives and tax breaks it will be difficult to achieve the shift to low carbon domestic heating solutions required to meet the Net Zero target of 2050.
- 1.7. The Government also needs to lead by example and work on the wholesale conversion of all Government and Public buildings to heat pump technologies. This will provide thought leadership by example. It is important for the uptake of heat pumps to show the Government is not only serious, but is changing the way Government is being heated. With the Palace of Westminster down for a major restoration, it is an ideal time to look at replacing the heating system with a zero carbon alternative.
- 1.8. MCS would strongly recommend a migration of the current environmental levies away from gas & electricity, towards heat pumps. Currently there are perverse incentives which are still supporting fossil fuels in the UK. There needs to be a systematic increase in the price of gas progressively over 15 years to make sure there is more adoption. Obviously there needs to be support and help for those in fuel poverty and assistance in migrating these people in social housing over to low carbon systems of heating. This will require taking a whole house approach to tackle fuel poverty, so substantial investment and determination will be required, not only from this Government, but from successive ones to achieve the decarbonisation of heating and a shift towards heat pumps.
- 1.9. Previous incentive schemes have not been high enough to encourage high volumes of heat pump installations, with consumers favouring instead cheaper renewable technologies such as Solar PV. To provide for a significant uplift in the annual volume of domestic heat pumps above the current level of 18,000 (MCS data for 2019), the sector needs long term and therefore sustainable policies and associated incentive schemes. This will encourage a necessary growth in the supply chain, through installer and manufacturer investment essential to the delivery of installation volumes closer to 1m Heat Pumps per annum.
- 1.10. Going forward it is vital that quality and standards are maintained not only for heat pumps, but also for all domestic renewables and that any new regulations require installations to be installed to MCS or higher standards. MCS provides for the quality assurance infrastructure, which in turn provides consumer confidence in new technology and will encourage the uptake of heat pumps. This is currently a requirement under current Government incentive schemes on all retrofit installations, which have to be MCS Certified and needs to be extended to new build housing Heat Pump installations as well and therefore be recognised as the industry Standard whatever the housing type.
- 1.11. Looking at the investment needed over a substantial period of time, it is vital that the Government reinstates or creates a new Green Investment Bank to provide 100% funding upfront at 0% interest rates to remove a significant barrier to Heat

Pump installations. These loans need to be associated with the property and not the individual and should be paid back through an energy tariff no greater than a household's current energy bills. Help and support for social housing and those in fuel poverty is also needed and the Government will need to fund and support those interventions.

- 1.12. Currently there are no communication or awareness campaigns around the transition to Net Zero, low carbon and zero carbon heating and nothing visible for heat pumps. The Government needs to run awareness campaigns to help inform the public about the changes and transition towards heat pump technology.
- 1.13. Regulation is the key to encouraging the uptake of heat pumps, currently they are not on a par with traditional technologies like gas and changes to taxation, incentives and subsidies are required.

2. How can we ensure that the regulatory frameworks in place work together to guarantee heat pumps are used in the most effective places, alongside other technological solutions?

- 2.1. To change the current building regulation by March 2023. These must state that heat pumps / low carbon heating is the default option in all new builds. The Buildings and Heat Strategy needs to include a requirement to use microgeneration solutions like Heat Pumps and also needs to be included in the Future Homes Standards Part L regulations being developed by MHCLG and should be introduced from March 2023. Again there needs to be a requirement to make sure quality installations are installed to MCS or higher standards to provide consumer confidence and make sure renewable technology does not lose the current quality assurance standards.
- 2.2. All domestic renewable installations including heat pumps, are required to be installed to MCS standards. This is why MCS was established by the Government in the first place. This will prevent low cost builders and low-quality installers taking advantage and the proposed regulatory changes. It is vital with Heat Pumps and any domestic renewables, that high quality installation and consumer protection is put in place through government established assurance schemes like MCS.
- 2.3. It is important to note that Heat pumps are effective in all settings and all homes and that there is a heat pump solution for every domestic environment and business environment.
- 2.4. Regulation is currently fragmented across key Government Departments/Ministries and a joined up approach similar to Austria, Germany and Sweden should be adopted to ensure a stable regulatory framework for the adoption of heat pumps. Heating, Net Zero and Climate Change span at least three major Government departments (Defra, MHCLG and BEIS). There needs to be an integrated strategy and communications plan, working with the Treasury to restart the Green Investment Bank to achieve the changes required.
- 2.5. As part of any regulatory environment it is vital that 'Annual revisions' should be a requirement of any new regulatory framework. For example, Part L of the Building Regulations needs to be updated on an annual basis to make sure these regulations and standards remain relevant and respond to technological developments and reflect changes in a fast moving market to provide the best zero carbon options. They cannot be left to stagnate or gather dust. These need to be living documents subject to an annual review.
- 2.6. As part of the regulatory framework the Government needs to regulate to phase out oil and gas heating on new builds by 2023. The recommendations by the Committee

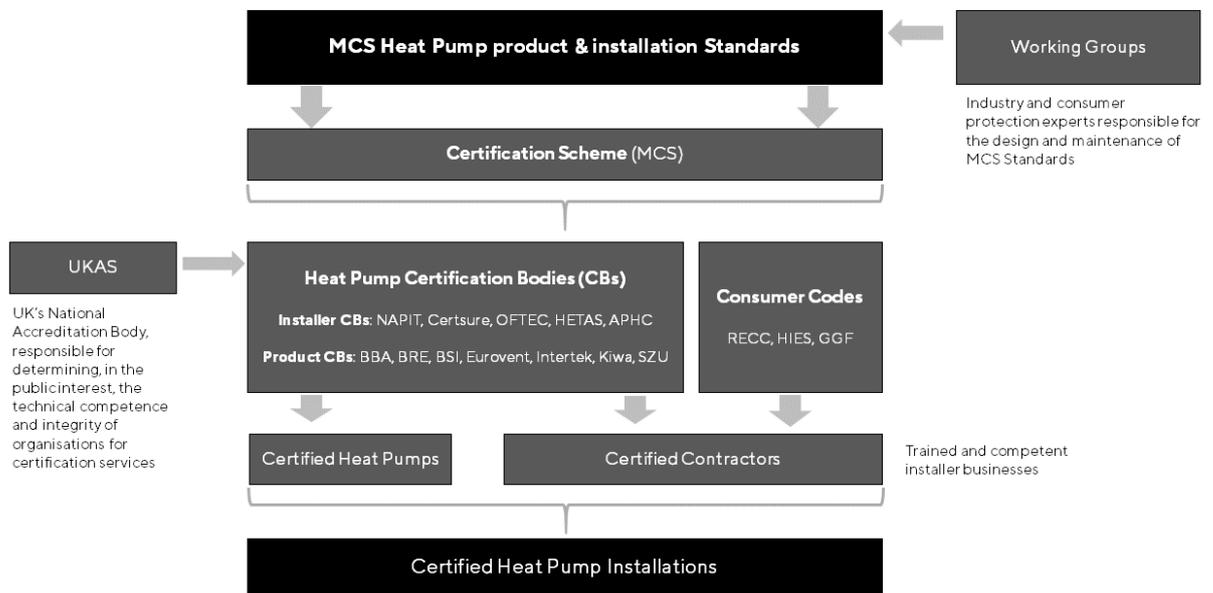
on Climate Change are suggesting 2025, but from now until December 2025 we could see more than 1.5 million new homes being built. The longer we wait to change the regulations the more homes will need retrofitting. We also need to indicate very clearly that fossil fuels will no longer play a role in heating our homes and offices.

- 2.7. Under regulation changes we also repeat the need to remove VAT on all domestic renewables and installations, including heat pumps and setting the base rate at 0% for a period of 10 years from December 2021. This also includes whole heating systems associated with any renewable technology and installation.
- 2.8. Regulation plays a vital role in the energy markets of the UK and there is a need to regulate to migrate fossil fuel subsidies on oil and gas over to renewables, including heat pumps and also to start placing a new Carbon Tax on fossil fuels to slowly price them out of the market for domestic heating solutions.
- 2.9. Regulation changes are vital to transforming the future environment. One suggested change should be to remove the Gas Boiler options from the Future Homes Standard (3.9 Option 1. and 2.) and replace with Heat Pumps. The Future Homes Standard provides an opportunity to build very low carbon homes and transform the way we use renewables to heat and light our homes. We cannot allow the fossil fuel lobby to delay the deployment and use of domestic renewables in helping to achieve a zero carbon future.
- 2.10. Recognise training requirements and installation standards eg CIPHE training – low temperature heating course becomes a pre cursor to Heat pump training – applies to all technology. Standards need to MCS Certified or higher for installations and MCS should be the regulated and only standard used as was intended by the Government when the set up standards scheme in 2008.
- 2.11. MCS urges that there needs to be an integrated package of support, information and advice to help households and property owners access the right low carbon heating system, improve energy efficiency and decrease carbon emissions. It is important that this information is reviewed and if necessary updated annually to make sure information provision is relevant and reflects standards and changes to regulations and is consistent across the UK.
- 2.12. The Government needs to change regulations to remove fossil fuel subsidies on gas and oil and migrate these to low carbon domestic renewables like Heat Pumps and place an incremental Carbon Tax on gas and oil to shift the market over time and the transition to low carbon heating solutions.
- 2.13. MCS encompasses the UK's recognised Standards for both Heat Pump products (technology) and their installation. Standards are written and maintained by Working Groups, consisting of experts in Heat Pump manufacture, installation and consumer protection. For over a decade MCS Standards have been tested in the field. The associated Certification Scheme has been relied upon by; (1) consumers who need confidence in the investment they are making and the associated protections if things were to go wrong; (2) acting as the sector's 'rule book' and such providing the measures by which the quality of Heat Pump technology and its installation can be judged; and (3), offering government the cornerstone of an essential regulatory framework; MCS is the quality certification scheme that underpins the Domestic Renewable Heat Incentive and the Green Homes Grant.
- 2.14. MCS is the quality infrastructure for the installation of Heat Pumps. Under MCS manufacturer's products and installer quality is independently assessed and verified by Certification Bodies. For Certification Bodies to deliver their impartial compliance assessments against MCS Standards, they require accreditation to ISO/IEC 17065, being the international Standard for bodies certifying products,

processes and services. The United Kingdom Accreditation Service (UKAS) provides ISO/IEC 17065 assessments of Certification Bodies, and in so doing determines the impartiality of the assessments that Certification Bodies conduct.

2.15. No other Scheme, associated with Heat Pumps and their installation in people’s homes, is constructed in this way here in the UK. From a regulatory framework perspective it is important therefore to distinguish between a Standards backed Scheme such as MCS, through which a manufacturer’s products and an installer’s quality has been independently assessed, and that of a registration scheme for which membership can be purchased and assessments if undertaken, related to ‘standards’ (lower case ‘s’) that have not been developed through a community of industry experts, facilitated by a Secretariat function, with standards their development subject to public consultation.

UK’s Quality Infrastructure for the installation of Heat Pumps



2.16. MCS already works effectively in support of Ofgem as the national regulatory authority. Ofgem relies on the data MCS captures on every certified installation of a Heat Pump in the UK.

2.17. Into 2021, MCS will launch a revised certification framework that has been designed to support a growing Heat Pump market and its consumers. This will include clearer, simplified and therefore more accessible Standards that recognise the need for skilled designers distinct from Heat Pump system installation (fitting), greater support for those installers that wish to join the sector to embed quality at the start of their delivery of Heat Pump systems, and a more robust compliance model that can protect hundreds of thousands and not just tens of thousands of consumers.

3. What steps can be taken to lower heat pump installation costs?

- 3.1 The total cost of installations in the UK needs to be considered in the context of a much larger international market, especially for the installation of Heat Pumps, for which the UK share is tiny. Until Heat Pumps are installed in significantly larger volumes, the UK is unlikely to see a significant reduction in the cost to consumers.
- 3.2 Changing Planning Regulations will instantly increase the volume of installations being introduced and through scale, reduce the cost of individual installations to homeowners. With a guaranteed markets, manufacturing plants can build whole units to save installation costs on site. The economies of scale again will reduce costs, but this relies on Regulation changes that actively promote and support heat pumps.
- 3.3 To remove VAT on all domestic renewables, including heat pumps and set the base rate at 0% for a period of 10 years, including installation and whole heating systems associated with heat pump technology. This will substantially reduce costs and also simplify the VAT system associate with zero carbon renewables and associated whole heating and installation costs. Zero Carbon = Zero VAT for 10 years
- 3.4 Compared to a whole system gas boiler (boiler, hot water cylinder and associated pumps) the costs of the physical equipment are not hugely different. With reduction of VAT to 0% and migrating incentives and subsidies away from fossil fuels you can again reduce installation costs, when you look at whole systems.
- 3.5 There is also the opportunity to look at community schemes which can use natural resources eg Mine Water networks for ground water heating for communities and new housing and could also reduce costs through community sourced heating.
- 3.6 The cost of compliance to the MCS quality assurance scheme will reduce into next year and beyond. As the volume of certified installers increase, MCS is working with its Scheme operators – Consumer Codes and Certification Bodies – to reduce the compliance burden where there is lowest risk of non-conformity to the Standards, and by focusing the Scheme’s compliance resources on those areas of the market that represent the greater risk of non-compliance.

4. What role should gas or hybrid heat pumps play in helping the UK reach the target of net zero emissions by 2050?

- 4.1. To place this question into context it is important to make sure the primary technology is heat pumps and this is the lead technology to the consultation and evidence. Earlier we stated and it is important to do so again that there is a heat pump solution for every dwelling.
- 4.2. Hybrid heat pumps are not the way to go to futureproof energy provision for homes or businesses. As gas should be phased out, hybrid Gas Heat pumps are not a longterm low carbon heating solutions. Even if you consider this as a transition approach, we would still recommend a 100% Heat Pump rather than lead with a hybrid solution.
- 4.3. There are risks associated with any hybrid pump and would need additional design to prevent a fossil fuel becoming the primary source of heating. It should also be stated that oil hybrids should not be considered, due to the carbon generated through their use.
- 4.4. We believe that there are currently better alternatives to hybrid heat pumps and using 100% renewables is the way to go from the very start. A complete move away from fossil fuels would make more sense and would be our recommendation.

- 4.5. MCS is supportive of hybrid systems that effectively combine renewable energy technologies such as a Heat Pump and Solar Thermal. In this scenario, we would like to see an additional but lower value grant awarded for the lower cost technology. In this case, Solar Thermal could attract a further £1,000 grant on top of the grant awarded for the Heat Pump installation.
- 4.6. MCS urges that there be a refinement of definitions to make a clear distinction between a hybrid system as a renewable technology coupled with a fossil fuel versus a hybrid system as a combination of renewable technologies in a property.

5. How can the Government tackle the current skills gap for designers, builders, and installers of heat pumps?

- 5.1. MCS has recently supported a much-needed update to existing 'conversion' training courses to already experienced and qualified Heating and Plumbing engineers, leading to Level 3 awards 'in the Installation and Maintenance of Heat Pump Systems' as offered by BPEC and LCL Awards. Criteria has also been set of a new course and associated qualification that will replace these existing Level 3 courses, combining an MCS developed criteria with a criteria facilitated by the Heat Pump Association (HPA). Ultimately though these courses can only go so far in encouraging an already busy gas and oil-based heating sector to transition to Heat Pump installers and as such, does not represent the best way to secure a skilled workforce that the UK will need in the long term.
- 5.2. MCS would not advocate a government backed training voucher scheme. Voucher schemes have not proven successful in the past, being of greatest benefit to training providers versus students. The market opportunity available to a would-be Heat Pump installer should be incentive enough to invest in their training, leading to MCS certification for the achievement of the sector's mark of quality. It is this commitment to the sector that the UK will need to ensure quality Heat Pump installations and MCS will support would-be Heat Pump installers in understanding the market opportunity
- 5.3. The Government needs to create visibility of a market that makes it a desirable profession with stability and growth for people to invest in training and upskilling to make this a career path. All training needs to be of a sufficient standard and a certification and assurance scheme membership should also be a requirement of any training to provide customers with a standard and consumer confidence. There needs to be clear career training paths created to bridge the gaps, but this will only come about if you have a stable and growing market which allows investment in staff and training. If building regulations are changed so that zero/low carbon homes are being built you are creating an extra 300,000 installations a year and the opportunities.
- 5.4. Conversion training for the future for current fitters - transition as they have a lot of the skills and experience and would easily help deliver the renewable technologies.
- 5.5. Training also needs to provide a professional career path with high standards and membership of assurance schemes and standards organisation like MCS or higher to provide further skills, training and protection for consumers, so guaranteed standards are delivered during installations by contractors.
- 5.6. The introduction of government led training/regulations similar to gas safety may be required.

6. How can public awareness of heat pumps be improved?

- 6.1. It is important that the Government takes the lead and starts a national awareness campaign on heat pumps and zero carbon homes and what this will mean for the future and talking about the benefits.
- 6.2. The Government can also use the media when decarbonising Ministries and Department buildings as well as the refurbishment of the Palace of Westminster as part of the proposed renovation, replacing the Victorian plumbing and heating system with a heat pump system.
- 6.3. When entering Government offices and buildings that have been refurbished show people a display of the carbon savings and reduced energy use compared to previous systems. Again it helps educate people about new low carbon alternatives. It also shows the Government leading by example, especially prior to COP26. This could also be rolled out to other public buildings, local authority offices, schools and colleges.
- 6.4. There are opportunities to create partnerships or work with influencers across Social Media platforms who can help share the message.
- 6.5. Awareness built into curriculum at all stages of Higher Education levels, to show there is a clear career path created in the renewable sector and a training or apprenticeship path young people can follow.
- 6.6. Annual servicing and futures needs and information
- 6.7. The Government and/or Local Authorities could develop a sensory experience road show or virtual experience for consumers to understand the technology, e.g. even have heat pump show rooms to start breaking down barriers to adoption and promoting alternatives. It is also worth highlighting that we have many heat pumps already in our lives e.g. Fridges keeping food fresh, condensing tumble driers, fridge freezers, air con units in cars etc. This is not new, just sustainable technology that we already have in our homes.
- 6.8. The Government needs to update and standardise renewable and retrofitting information across the UK so it becomes consistent and is updated on an annual basis to reflect changes in regulations, policy and technological developments.
- 6.9. Householders also need to be made aware of recognised government approved standard schemes like MCS to provide assurances of quality and consumer confidence in domestic renewable technology. Any shift to renewable technology needs to be protected and high standards of installation and skills of professionals in installing it to a certified standard. There needs to be awareness of the scheme and the logo so consumers know that they are going to be protected.
- 6.10. A recent report published by the Energy Systems Catapult surveyed 2,000+ people with most respondents saying that they have heard of the different low carbon heating options. Around half believed that a low carbon heating system would have a positive impact on climate change. Yet fewer than 20 per cent said they were likely to change to a low carbon heating system when they next need a heating system replacement. The main reasons cited were that low carbon heating systems were more expensive and less convenient.
- 6.11. MCS advises that low consumer awareness of renewable heating in relation to performance, electricity use and price will also lead to mis-selling.
- 6.12. MCS is aware of cases where an installer will promote a range of different systems to a customer, and the customer will settle for the lowest capacity option as the cheapest. The installer may then later say that the heat loss calculations have changed, and a higher capacity system is now required, which in turn is more

expensive. Similarly, an installer may provide an attractive initial quote and then cite supply chain problems, resulting in a more expensive product and a poor deal for the consumer. In both scenarios, if outside their cooling off period, the consumer is tied into a contract that will end up unexpectedly costing them more. This problem can be exacerbated by the fact that there aren't centrally published prices for the costs of a Heat Pump / Heat Pump models. Publication of these could help a consumer during their research, as well as empowering them when comparing quotes. MCS intends to play a role in the future in terms of advertising average installation costs by building type.

- 6.13. Another mis-selling opportunity may arise from non-certified installers, in particular if grants are oversubscribed. An installer could build their sales pitch around grant availability and the promise of an attractive quote, with an inferior system and poor installation. The customer gets a cheap system rather than a certified, grant funded one. Consumer awareness raising is vital so that a consumer understands that they need to look for the MCS quality mark when investigating solutions.
- 6.14. We must ensure that consumers have a good understanding of energy efficiency and how this affects their energy bills. Consumers must begin to plan for the whole life cost of energy.
- 6.15. MCS as the industry's Standards and quality scheme has recently enhanced its approach in placing consumer protection at its heart. This has included the integration of consumer code membership via an innovative new partnership with the CTSI approved scheme RECC (Renewable Energy Consumer Code). This offers the sector a single compliance regime that is easier to understand and comply with. MCS sees part of our role as empowering consumers to make an informed decision when researching and installing a low carbon heat solution. We will provide impartial information, calculators and other useful tools. This will be supported with clear, targeted communications and campaigns. Ultimately, we will promote the importance of employing an MCS certified installer that they can trust. It should be noted that the MCS Charitable Foundation has commissioned a scoping study to review the information and advice available to consumers on renewable energy and energy efficiency in the home. This is due for publication before the end of 2020.

We would like to offer to present evidence to the committee through our chosen experts to represent standards, trade associations, heat pump manufacturers and installers.