

February 2025

Making Performance-led Home Retrofit a Reality

Recommendations

mima MINERAL WOOL
INSULATION
MANUFACTURERS
ASSOCIATION

Making Performance-led Home Retrofit a Reality

Seven recommendations

The goal

Build consumer confidence in UK home energy upgrades by guaranteeing good outcomes.

The approach

MIMA is calling for policy and industry standards to support and encourage an ever-growing number of Retrofit Providers to innovate and bring forward market offerings we are calling 'Outcomes-Based Guarantees'. These are optional contracts with customers whose terms assure or guarantee certain outcomes from home fabric and/or clean heat retrofits, such as a specified, minimum heating system efficiency or agreed energy saving in kWh.

Outcomes-Based Guarantees would be:

- Supported by the joined-up delivery of insulation, fabric upgrades, and clean heating systems in homes, where appropriate; and
- Enabled by fabric performance testing, and metering and monitoring of heat pump performance; both made a routine part of the customer journey.

1

Moving to a national policy framework in which Retrofit Providers are supported in routinely testing and checking how homes perform in practice once they are upgraded...

2

Enables and encourages more companies to innovate to bring forward guarantees related to certain outcomes of retrofit projects, such as guaranteeing quantified reductions in home heating demand...

3

Which helps to grow consumer trust and confidence in home energy upgrades and support for Net Zero buildings more generally.

Below, MIMA lists seven recommendations on these themes. For detailed analysis and explanation see our full report: [Making Performance-led Home Retrofit a Reality](#).

For further information please contact:
sarah@mima.info

Recommendation 1: Government to set an aspirational Target in the Warm Homes Plan to make measuring, metering, and monitoring of home energy performance the norm.

Detail: Government to set a Target in the Warm Homes Plan that by 2030 all UK households getting a home fabric and/or clean heat upgrade will be able to opt for a service from their Retrofit Provider which includes checks of the actual performance of the fabric and clean heating system, pre- and/or post retrofit as appropriate, using accredited methods, technologies, and forms of monitoring. Relevant industry standards would require Retrofit Providers to demonstrate that an offer to measure, meter, or monitor the fabric and/or the heating system has been made to customers.

Rationale: The new government creates a truly world-leading retrofit framework based on measured performance, helping to re-invigorate consumer appetite for and trust in home energy upgrades and energising the supply chain to come forward with innovative and exciting Outcomes-Based Guarantees.

Recommendation 2: Government schemes to incentivise the measurement, metering, and monitoring of home fabric performance and clean heating systems, moving towards making this mandatory in government funded energy efficiency programmes.

Detail: To support Retrofit Providers in bringing forward more measurement, metering, and monitoring of building energy performance in the short-term, and to make headway on MIMA's proposed 2030 Target, government should proactively incentivise checks of home fabric performance and clean heating systems, including by:

- Expanding 'pay for performance' policies such as that being consulted for ECO4.¹
- Updating EPCs to include the capacity for assessors to input measured data collected on a building's fabric performance, and potentially other measures, to improve the accuracy of the EPC rating, plus new metrics to drive such measurement, including an Actual Fabric Energy Efficiency (AFEE) rating.^{2,3}
- Developing policies based on concepts which place a value on the energy we do not use,⁴ in addition to policies we already have to increase energy supply, and particularly renewable energy.

Rationale: Incentives and rewards can trigger more and a wider range of performance testing approaches and Outcomes-Based Guarantees, greater innovation, and better outcomes for consumers sooner rather than later, without forcing a one-size-fits-all approach.

¹ See [Energy Company Obligation 4 and the Great British Insulation Scheme: mid-scheme changes - GOV.UK](#)

² The government's current consultation on EPC Reform includes proposals on this topic. See [Reforms to the Energy Performance of Buildings regime - GOV.UK](#)

³ See Box 21.

⁴ Sometimes referred to as 'Negawatts'. See [Kickstarting_negawatts.pdf](#)

Recommendation 3: Government to set a framework for the accreditation of methods and technologies used for fabric testing and heat metering and require that accredited approaches are used by Retrofit Providers.

Detail: As a minimum, fabric performance testing and heat pump heat metering offered by Retrofit Providers to customers as part of a home upgrade in pursuit of the 2030 Target, must use accredited methods and technologies, as defined by the Government in consultation with industry, and which includes requirements relating to accuracy, referencing existing standards as appropriate.

Rationale: Fabric testing and heat metering are critical enablers of a successful transition to a Net Zero building stock, meaning consumers can feel confident they are getting the performance they paid for. Both forms of monitoring are now possible at reasonable cost and minimal disruption and these tests are already underpinning existing Outcomes-Based Guarantees. It is essential testing technologies perform in line with agreed parameters.

Recommendation 4: Retrofit Providers should fit the smallest heat pump system possible, enabled by measuring the home's actual heat loss and improving the building fabric where appropriate.

Detail: Industry standards should seek to ensure that Retrofit Providers are specifying the smallest heat pump system possible to achieve desired internal temperatures, in order to potentially reduce up-front and running costs for the consumer. This goal is enabled by improving the building fabric, where appropriate, especially if the home's heat loss is high, and by measuring the fabric's actual performance.

Relevant industry standards should require Retrofit Providers to record for a household what steps will be taken to reduce the size of their heat pump system, including insulating.

Rationale: The smaller the size/capacity of the heat pump system needed, the lower the energy consumption, and the lower the upfront and running costs are likely to be.

Recommendation 5: The Warm Homes Plan should target all three determinants of space heating costs together: heat demand, heating system efficiency, and energy unit prices, to reliably and permanently reduce energy bills.

Detail: The Government can drive down home heating costs for all, for good, by acting on all three determinants of space heating costs in tandem: heat demand, heating system efficiency, and energy unit prices.

Rationale: This approach also helps to de-risk building decarbonisation policy by ensuring no single element of the 'Affordability Equation' is overly relied on to lower people's energy bills, and helps the Government to meet its manifesto commitment.

Recommendation 6: Consumers should be advised by Retrofit Providers to insulate their homes, where appropriate, before or when having a heat pump fitted, and be fully informed of the benefits of doing so.

Detail: Heat pump customers whose homes lack wall insulation, and the full complement of loft insulation should be advised to get this insulation done where possible, checking the home's technical suitability for the measures first. The advice should include an assessment of the additional benefits insulating could deliver, including additional predicted energy savings and fuel bill reductions.

Rationale: This recommendation supports the achievement of many UK policy objectives, including tackling fuel poverty by 2030, improving housing conditions, health and well-being, meeting carbon budgets, improving energy security, and taking the pressure off the electricity grid.

Recommendation 7: Consumers should be given an indication of their home's 'readiness' for low carbon heat on the EPC, linked to a metric on the actual fabric performance.

Detail: Future EPCs should include an indication (but not a definitive statement) of a home's 'low carbon heat readiness', linked to and enabled by our proposed new fabric performance metric: an Actual Fabric Energy Efficiency (AFEE) level, described in Recommendation 2.

Rationale: Research suggests that the vast majority of homes will be suited to a low carbon heating system, such as a heat pump, but some will need more work than others to prepare them. A new EPC indicator should trigger the switch to clean heat as soon as possible for homes that are already genuinely 'ready'.

mima MINERAL WOOL
INSULATION
MANUFACTURERS
ASSOCIATION

MIMA
T +44 (0)207 293 0870
sarah@mima.info

www.mima.info

