

Environmental sustainability policy

Date Approved by Management Committee:

25 June 2026

Due for Review:

June 2029



1. Introduction

- 1.1 The purpose of this policy is to guide how the Association will improve the quality of life of our tenants by reducing fuel poverty and helping them to use energy more efficiently.
- 1.2 This policy also guides how the Association will improve the environment, contribute to mitigating the effects of climate change and adopt more sustainable practices to reduce our adverse impact on the environment by using resources more efficiently and reducing waste.

2. Policy context

2.1 Fuel Poverty

2.1.1 Under the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019, a household is in fuel poverty if more than 10% of its net income after housing costs is required to meet its reasonable fuel needs, and if, after those costs are deducted, the remaining income is not enough to maintain an acceptable standard of living. In the Scottish House Condition Survey 2022, 31% of households in Scotland were estimated to be in fuel poverty. More recent local authority data for 2022 to 2024 shows Glasgow City with an estimated fuel poverty rate of 35%. There are four factors that interact to influence fuel poverty:

- Household income
- Energy costs
- Energy performance
- How energy is used in the home

2.1.2 In 2021, the Zero Emissions Social Housing Taskforce (ZEST) published a report setting out recommendations for how the social housing sector can support the Scottish Government's target of reaching net zero greenhouse gas emissions by 2045. The report remains an important reference point for the sector and informed the Scottish Government's subsequent response in 2022 and the development of proposals for a Social Housing Net Zero Standard (SHNZS), which is intended to replace EESSH2. The Association will continue to have regard to this policy direction, alongside current Scottish Government guidance for social landlords.

2.1.3 The review of EESSH2 has led to proposals for a new Social Housing Net Zero Standard (SHNZS), which is intended to provide the future framework for

improving the energy efficiency of social housing and transitioning to clean heating systems. Pending final decisions on the SHNZS, the Scottish Government's updated interim guidance for social landlords, published in March 2026, confirms that the 2025 and 2032 EESSH milestones are temporarily on hold. In the meantime, the Association will continue to invest in appropriate energy efficiency and decarbonisation measures, with a focus on fabric-first improvements and other actions that support tenants, reduce running costs and prepare our housing stock for future requirements.

2.2 Climate change

2.2.1 The [Climate Change \(Scotland\) Act 2009](#) was amended by the [Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2019](#) to strengthen Scotland's statutory climate targets in response to the [Paris Agreement](#). The amended legislation sets a target for Scotland to achieve net zero greenhouse gas emissions by 2045.

2.2.2 The Scottish Government's [Heat in Buildings Strategy](#) sets out the long-term direction for reducing emissions from Scotland's buildings through improved energy efficiency and the transition to clean heating systems. In taking this work forward, the Scottish Government has also recognised the importance of ensuring that action to decarbonise heat does not worsen fuel poverty. In Glasgow, local design and sustainability expectations for affordable housing are also informed by the [Glasgow Standard](#).

2.2.3 Much of Cernach's housing stock predates modern building standards, with more than half dating back to the 1950s. The Association has already taken steps to improve the thermal performance of this older stock, including through measures such as loft insulation and external wall insulation, and will continue to consider further improvements as part of its wider approach to energy efficiency, decarbonisation and tenant comfort.

3. Legislative and regulatory framework

3.1 Cernach HA will comply with the law and guidance issued by the Scottish Housing Regulator in relation to the standard of homes.

3.2 This policy has been developed within a framework that ensures proper compliance with legislation, regulatory advice and good practice including:

- Housing (Scotland) Act 2001, 2010, 2014

- Scottish Social Housing Charter
 - Human Rights Act 1998
 - The Building (Scotland) Regulations 2004
 - Equality Act 2010
 - Waste (Scotland) Regulations 2012
 - Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019
 - The Building (Scotland) Amendment (No. 2) Regulations 2024
 - The Energy Performance of Buildings (Scotland) Regulations 2025
- 3.3 The Housing (Scotland) Act places a duty on the Association to consult tenants on matters that can have a significant impact on service delivery; this is also embodied in the Association's tenancy agreement and in the Resident Engagement policy.
- 3.4 This policy has taken account of the requirements set out in the Scottish Social Housing Charter, which came into effect on 1 November 2022.

Outcome 4: Quality of Housing

Social landlords manage their businesses so that: *tenants' homes, as a minimum, when they are allocated are always clean, tidy and in a good state of repair, meet the Scottish Housing Quality Standard (SHQS), and any other building quality standard in place throughout the tenancy; and also meet the relevant Energy Efficiency and Zero Emission Heat Standard.*

Outcome 5: Repairs, maintenance and improvements

Social landlords manage their businesses so that: *tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.*

Outcome 11: Tenancy sustainment

Social landlords ensure that: *tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations.*

4. Equality and human rights

- 4.1 The Association's Equality and Human Rights policy, which was approved by the Committee in April 2025, outlines our commitment to promote a zero tolerance to unfair treatment or discrimination to any person or group of persons, particularly on the basis of any of the protected characteristics¹. This includes ensuring that everyone has equal access to information and services, and, to this end, the Association will make available a copy of this document in a range of alternative formats including large print, translated into another language or by data transferred to voice.
- 4.2 We are also aware of the potential for policies to inadvertently discriminate against an individual or group of individuals. To help tackle this and ensure that it does not occur, best practice suggests that organisations carry out Equality Impact Assessments to help identify any part of a policy that may be discriminatory so that this can be addressed (please see section 6 of the Equality and Human Rights policy for more information).
- 4.3 In line with section 6 of the Equality and Human Rights Policy, the Association carried out an Equality Impact Assessment on this policy and no remedial action was identified as necessary. The full assessment is appended at the end of this policy.

5. Risk Management

- 5.1 The Association has considered the risks of failing to adhere to this policy. As the policy predominantly sets the tone for the Association's approach to environmental sustainability, rather than prescribing specific actions, the direct risk attached to non-compliance is relatively limited. However, there are inherent risks in failing to make adequate progress towards decarbonisation. Progress against the relevant aims in this policy will therefore be monitored annually by the Management Team.

6. Priorities

- 6.1 Our priorities, in rank order, will be:
- Where we have a statutory or regulatory duty (e.g. EESSE/SHNZS/Building Standards).

¹ The Equality Act 2010 identifies the "protected characteristics" as age, disability, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, gender reassignment and sexual orientation.

- Where we can have the biggest impact on the lives of our tenants – i.e., their quality of life / financial benefit.
- Where action will have a lasting impact, rather than an impact that might be short-lived, reversed or require repeated investment.
- Where early action is likely to be more cost effective for the Association in the long term, recognising that standards are likely to continue to rise.

7. Measures

7.1 Working with tenants

- 7.1.1 The Association has a comprehensive tenancy sustainment policy, which will provide full details of the various ways in which we support our tenants. A major component of this policy, and our strategy, will be related to alleviating fuel poverty.
- 7.1.2 The Association employs a full time Welfare Rights and Tenancy Sustainment Officer. While they are not able to give specific fuel advice, they will regularly refer tenants on to other agencies, such as CAB Energy Best Deal, to offer this service.
- 7.1.3 The Association has in place its own tenancy sustainment fund, which can be used for a variety of means to assist people to remain in their tenancy, including providing floor coverings for tenants who cannot otherwise afford this.
- 7.1.4 The Association will continue to seek, apply for and distribute funding relating to fuel poverty wherever possible. We have previously been successful in accessing funding through bodies such as SFHA and the Fuel Bank Foundation to address fuel poverty, and will assess on a case-by-case basis any similar funding that becomes available.
- 7.1.5 The Association will support tenant and/or owner requests for permission to install electric vehicle charging points where appropriate.
- 7.1.6 The Association will promote education on sustainable living for tenants, including recycling and waste disposal methods, energy saving tips and environmental projects in the local community.

7.2 Buildings

7.2.1 The Association will seek to ensure that its homes continue to meet the current Energy Efficiency Standard for Social Housing (EESH) requirements. There is currently one unit that does not comply, and this relates to a tenant preference for electric heating. The Association will keep this under review and will consider any future opportunities to improve the energy performance of the property in a way that is practical, proportionate and consistent with tenant needs.

7.2.2 The Association recognises that the proposed Social Housing Net Zero Standard (SHNZS) is intended to replace the planned EESH2 standards and provide the future framework for decarbonising social housing. The Scottish Government's interim guidance for social landlords, published in March 2026, confirms that the 2025 and 2032 EESH milestones are temporarily on hold while final decisions on SHNZS are developed. In the meantime, the Association will continue to keep up to date with guidance and will plan proactively for future requirements by prioritising practical, low-regret improvements that support energy efficiency, reduce running costs and prepare our housing stock for the transition to net zero.

7.2.3 We will ensure that when major components (e.g., heating, ventilation, windows) are due for replacement there is a scoring mechanism to take account of sustainable forms of material and/or contract waste management. The aim of the options appraisal would be to consider the feasibility of more sustainable forms of provision. For example:

- Heating systems
- Glazing
- Ventilation
- Insulation
- Solar PV

7.2.4 We will investigate research into improving energy efficiency, ventilation and internal air quality of our housing stock. This includes an annual budget allocation towards the provision of ventilation for properties requiring this, in line with the Association's approach to dampness, condensation and mould.

7.2.5 Maintenance and renewal life cycles adopted for dwellings and their components tend to reflect mortgage terms (30 years is the most commonly quoted figure) rather than the actual lifespan of maintained construction. Components often outlast their predicted lifespan and are needlessly replaced

on manufacturers' recommendations or on the basis of established maintenance schedules rather than through rigorous inspections of individual items. Through stock condition surveys and regular updates to its life cycle data, the Association will ensure that significant embodied energy can be saved through accurate and evidence-based maintenance schedules which are demand-led rather than predicted and provided for.

7.2.6 When establishing future maintenance contracts, we will consider the following within the specification:

- Climate resilience: consider whether drainage and other external elements are robust enough to withstand increasing storm events and rainfall
- Local sourcing: source local contractors and materials
- Waste minimisation: ensure all contractors provide waste minimisation plans
- Water conservation: ensure all new kitchens and bathroom fittings are water conservation products
- Environmental products: build up a database of environmentally preferable products
- Embodied carbon: consider the whole-life environmental impact of materials and products, including durability, repairability and expected lifespan
- Energy efficiency: specify energy-efficient products, equipment and controls where replacements are being installed
- Biodiversity: where maintenance or improvement works affect roofs, gardens, boundary treatments or other external areas, seek opportunities to protect or enhance biodiversity where practical and avoid unnecessary harm to habitats and wildlife

7.3 Newbuild

7.3.1 While the Association does not currently have any plans for building new homes, we will retain our strategy for environmental sustainability in new build homes should this opportunity arise again in future.

7.3.2 Compliance with the energy sections of the current Building Standards requires a holistic appraisal of the energy strategy for a site in order to arrive at a solution which is cost effective, yet also of clear benefit to the residents of each dwelling. This will typically involve consideration of heating and ventilation systems, air tightness and the potential use of renewable technologies. Additional grant funding can be obtained by meeting a higher level of performance under Section 7, Aspect 2 (energy for space heating),

with this being deemed the 'Silver' standard. Aside from these measures, a variety of other features are incorporated to improve energy efficiency and to promote longer term sustainability, with a 60-year design lifespan:

- Maximising opportunities for solar gain through orientation and site exposure
- High performance 'A' rated boilers to all properties
- High levels of sound insulation, both within and between dwellings
- High SAP ratings, demonstrating reductions in CO2 emissions and preventing energy losses
- Design to maximise accessibility, flexibility and adaptation
- Specification of materials with low embodied energy and toxicity, using recycled/ recyclable materials where possible
- Specification of local or Scottish products and materials where possible
- Reducing transport-related energy demand

7.3.3 The Scottish Government has announced through its Heat in Buildings Strategy that new homes applying for a building warrant from 1 April 2024 must use zero direct emissions heating systems. As the draft Buildings (Heating and Energy Performance) and Heat Networks (Scotland) Bill has not been enacted, the Association is not able to fully adopt the terms of that draft legislation at this stage. This is unlikely to be problematic as the Association does not have any current plans to build new homes that will be affected by these legislative changes. We will therefore comply with any legal requirements enacted following the approval of this policy where required.

7.3.4 At handover of newly completed properties, we will ensure that tenants receive advice on how to make best use of heating, generation and ventilation systems (e.g., running heavy load items in daytime to make best use of solar PV).

7.4 Supply chain

7.4.1 We will require contractors to have their own sustainability and waste reduction policies as part of the procurement process.

7.4.2 We will investigate options for choosing sustainable products when ordering office equipment and materials. This includes upgrading office lighting to energy-efficient light bulbs where appropriate.

7.5 Offices and staff



- 7.5.1 The Association will consider reviewing power, heating and ventilation systems and practices as and when the need arises and will pay particular regard to renewal of the heating system should a clean heating or zero direct emissions alternative be feasible.
- 7.5.2 The Association will promote reduction, reuse and recycling of office consumables. This includes moving to digital methods of communication where possible – particularly with regard to Management Committee correspondence which tends to be particularly onerous in terms of paper requirements.
- 7.5.3 The Association will source recycled materials wherever possible, particularly with regard to printer paper, and will seek to minimise the use of single use plastics.
- 7.5.4 The Association will evaluate the feasibility of an electric vehicle charging point at the office, taking account of staff requirements and demand.
- 7.5.5 The Association makes all reasonable attempts to recycle out-of-date office equipment, and has recently donated furniture to a local school – as well as sending data-wiped ICT equipment to be redistributed as part of a national charity scheme.
- 7.5.6 The Association will take account of environmental sustainability when procuring and replacing ICT equipment and digital systems. This will include seeking energy-efficient solutions where practical, considering durability and expected lifespan, and promoting the reuse, refurbishment or responsible recycling of equipment wherever appropriate.
- 7.5.7 The Association will encourage responsible use of digital systems and office technology by reducing unnecessary printing, duplication of files and avoidable data storage where possible. In using digital services, including AI and other emerging technologies, the Association will seek to do so proportionately and responsibly, with due regard to wider resource and energy use.

8. Staff Training

- 8.1 Cernach recognises that adequate staff resourcing and training are essential to meeting the needs of the business. All staff involved in maintaining homes,



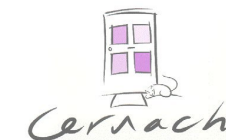
arranging office works, promoting tenancy sustainment and procuring office materials will be made aware of this policy.

9. Policy Review

- 9.1 The Association will make the policy available on the Association website.
- 9.2 The Management Committee will review this policy every three years. This review will be brought forward if there is need to respond to new legislation and/or policy guidance.



Cernach Housing Association
Equality Impact Assessment



Name of the policy / proposal to be assessed	Environmental Sustainability Policy	Is this a new policy / proposal or a revision?	Revision
Person(s) responsible for the assessment	Emma McShane		
1. Briefly describe the aims, objectives and purpose of the policy / proposal	To minimise the Association’s impact upon climate change and seek to identify new ways of decarbonising process and homes		
2. Who is intended to benefit from the policy / proposal? (<i>e.g., applicants, tenants, staff, contractors</i>)	Staff, Contractors, Management Committee Members, Tenants, Applicants, Factored Owners and any other stakeholders.		
3. What outcomes are wanted from this policy / proposal? (<i>e.g. the benefits to customers</i>)	A reduction in the levels of carbon emissions made by the Association		
4. Which protected characteristics could be affected by the proposal? (<i>tick all that apply</i>)			
<input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Marriage & Civil Partnership <input type="checkbox"/> Pregnancy/Maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion or Belief <input type="checkbox"/> Gender <input type="checkbox"/> Gender Reassignment <input type="checkbox"/> Sexual Orientation			



5. If the policy / proposal is not relevant to any of the **protected characteristics** listed in part 4, state why and end the process here.
 After careful consideration, there is no known elements of this policy that would impact any of the 9 protected characteristics.

	Positive impact(s)	Negative impact(s)
After careful consideration, there is no known elements of this policy that would impact any of the 9 protected characteristics.		
7. What actions are required to address the impacts arising from this assessment? <i>(This might include collecting additional data, putting monitoring in place, specific actions to mitigate negative impacts).</i>		

Signed: E McShane Job title: Head of Corporate Services

Date the Equality Impact Assessment was completed: 08/06/2026



Appendix 1. Summary of changes from the 2023 Environmental Sustainability Policy

NB. This table summarises the key amendments made to the policy.

Section	Proposed Amendments	Comment
1.1–1.2 Introduction	Introduction wording streamlined and updated to use more consistent climate and sustainability terminology.	Style and terminology refresh.
2.1.1 Fuel poverty definition	Updated to reflect the current statutory definition in the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019 and revised prevalence data for Scotland and Glasgow.	Legal, evidence and drafting update.
2.1.2 ZEST	Reframed ZEST as a key sector report informing subsequent Scottish Government response and SHNZS development.	Policy context updated.
2.1.3 EESSH2 / SHNZS	Updated to reflect SHNZS proposals, the March 2026 interim guidance for social landlords, and the temporary hold on the 2025 and 2032 EESSH milestones.	Substantive policy update.
2.2.1 Climate change legislation	Clarified that the 2009 Act was amended by the 2019 Act and confirms Scotland's net zero target for 2045.	Legal accuracy update.
2.2.2 Heat in Buildings Strategy / Glasgow Standard	Updated clean heating terminology, retained the fuel poverty link, and clarified the Glasgow Standard's role in local expectations.	Terminology and context update.
2.2.3 Housing stock	Expanded wording on improvements already made to older stock and future consideration of energy efficiency, decarbonisation and tenant comfort.	Explanatory update.
3.2 Legislative / regulatory list	Expanded the list to include relevant 2024 and 2025 building and EPC regulations.	Framework update.
3.4 Scottish Social Housing Charter	Updated to note that the current Charter took effect on 1 November 2022.	Regulatory update.
5.1 Risk Management	Refined the wording and confirmed annual monitoring by the Management Team.	Drafting and monitoring update.

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6.1 Priorities	Retained priorities, with minor wording and punctuation changes for consistency.	Minor drafting update.
7.1.4 Funding for fuel poverty	Expanded to reference previous funding secured through bodies such as SFHA and the Fuel Bank Foundation, and to confirm future opportunities will be assessed case by case.	Operational detail added.
7.1.5 EV charging requests	Updated terminology to refer to electric vehicle charging points.	Terminology correction.
7.1.6 Tenant education	Wording polished for clarity and consistency.	Minor drafting update.
7.2.1 EESSH compliance	Updated to confirm continued compliance with current EESSH requirements, explain the single non-compliant unit, and note ongoing review of future improvements.	Operational and context update.
7.2.2 Future standards / SHNZS	Updated to explain that SHNZS is intended to replace EESSH2, that the 2025 and 2032 milestones are on hold, and that the Association will prioritise practical low-regret improvements in the interim.	Substantive policy update.
7.2.6 Future maintenance specifications	Refined the lead-in wording and expanded the list to include embodied carbon, energy efficiency, biodiversity and climate resilience.	Expanded measures.
7.3 Newbuild	Updated wording to reflect the New Build Heat Standard position from 1 April 2024, clarify the status of the draft Buildings Bill, and correct drafting points.	Policy and drafting update.
7.4 Supply chain	Wording refined on sustainable products and office materials.	Minor drafting update.
7.5 Offices and staff	Existing provisions retained and tightened, terminology updated for clean heating and EV charging, and new paragraphs added on sustainable ICT procurement and responsible use of digital systems, including AI and emerging technology.	Expanded section with new digital and ICT measures.
8.1 Staff Training	Refined wording to identify the staff groups who will be made aware of the policy.	Drafting update.