

# CIS 8

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# **UKAS Approach to Accreditation of PAS 2030 Certification Bodies**

# **Contents**

1.	Intro	oduction	3			
2.	Scoping					
3. Assessment Criteria						
4.	UKAS Assessment of Competence of Certification Body Personnel					
5.	Assessment Reporting					
6.	Ass	Assessment Approach - Detailed Points				
	6a.	Certification of Existing Customers by Accredited Certification Bodies	8			
	6b.	Communication between UKAS and the Green Deal Oversight and Registration Body (GD ORB)	9			
6c. 6d. 6e.		Assessment of Competence of Installation Organisation Personnel by the Certification Body	10			
		Impartiality	10			
		Microgeneration	10			
	6f.	PAS 2030 Registration for Gas Safe Registered Businesses	11			
Ар	Appendix 1. Measure-Specific Annex Selection and Co-Installation Requirements					
Ар	Appendix 2. Clustering PAS 2030 EEM Installation Scopes for Assessment 14					

# **Changes since last edition**

Title changed - Green Deal updated to PAS 2030

References to Department for Energy and Climate Change (DECC) updated to Department of Business, Energy and Industrial Strategy (BEIS)

References to standards updated

Energy Efficiency Measures (EEM) updated

Includes reference to Trustmark Framework Operating Requirements v2.0



# 1. Introduction

#### 1.1 Scope and Introduction

The Department of Business, Energy & Industrial Strategy (BEIS) (formerly the Department for Energy and Climate Change (DECC)) established the Green Deal programme in 2012 aimed at improving the energy efficiency of British properties. The Green Deal enables private firms to offer consumers energy efficiency improvements to their homes, community spaces and businesses at no upfront cost, and will recoup payments through a charge in instalments on the energy bill. In addition, the requirements for energy suppliers to meet the Environmental Performance of Buildings Directive (EPBD) has resulted in several schemes to fund and deliver energy efficiency measures in dwellings such as the Energy Company Obligation (ECO) which is administered by Ofgem. Schemes such as ECO required installers of measures to be PAS 2030 certified in order to undertake funded work. PAS 2030 was first published in 2012, and has been revised several times, most recently in 2019.

### 1.2 Green Deal

A customer (an owner or occupier of a domestic or non-domestic property) has an assessment done by a Green Deal Advisor (GDA) who works for a Green Deal Advice Organisation (GDAO) with accredited certification from a Green Deal Advice Certification Body (GDA CB). The advisor inputs information on the property and its occupancy into software that produces a Green Deal Advice Report (GDAR) of recommended energy efficiency or micro-generation measures for installation. The customer takes the GDAR to a Green Deal provider (GDP) who arranges the finance and commissions the work from Green Deal Installers (GDIs) with accredited certification from a Green Deal Installation Certification Body (GDI CB). Thus, UKAS is involved in accrediting certification of Green Deal advice and installation services using ISO/IEC 17065 as the accreditation standard. PAS 2031 - Certification of energy efficiency measure (EEM) installation services was published at the same time as PAS 2030 and most recently revised in 2019.

BEIS has appointed the Green Deal Oversight and Registration Body (GD ORB) to act on its behalf in administering the Green Deal.

GD ORB maintains the Green Deal registers of providers, certification bodies, installation bodies and assessor organisations on their webpages and monitors compliance with the Green Deal Code of Practice.

All participants in the Green Deal programme also have to comply with the Trustmark Code of Practice. Compliance with this is not assessed by UKAS but by Trustmark.

#### 1.3 Energy Company Obligation (ECO)

The Energy Company Obligation (ECO) is a government energy efficiency scheme in Great Britain to help reduce carbon emissions and tackle fuel poverty. The scheme began in April 2013, and over time it has been amended. The latest policy, ECO3, commenced on 3 December 2018, and applies to measures completed from 1 October 2018 to March 2022. ECO 4 is due to commence in March 2022 until March 2026.

Under ECO, medium and larger energy suppliers fund the installation of energy efficiency measures in British households. Each obligated supplier has an overall target based on its share of the domestic energy market in Britain. The obligated energy suppliers work with installers to introduce certain efficiency measures into a dwelling, such as loft or wall insulation, or heating measures. The ECO3 scheme consists of one distinct obligation: The Home Heating Cost Reduction Obligation (HHCRO).

CIS 8 Edition 2

#### 1.4 Trustmark

Following the Each Home Counts (EHC) independent review and the decision to provide a quality mark for domestic retrofit projects this has been established as the Trustmark Government endorsed quality scheme. Installers are therefore required to meet the requirements of the Trustmark Framework Operating Requirements v2.0 – this is not accredited by UKAS but assessed by Trustmark on its licenced operators.

1.5 PAS 2035:2019 - Retrofitting dwellings for improved energy efficiency - Specification and guidance was published by BSI in June 2019 on behalf of BEIS. The document was produced for installation projects in order for retrofit advisors, designers, evaluators, coordinators, assessors and installers to ensure that the installation of multiple EEMS and their interaction does not adversely affect building performance and operation. Certification to PAS 2035 is not directly accredited by UKAS but as there are several cross references to PAS 2030 and interactions with PAS 2030 EEM installation requirements, PAS 2030 CBs will be required to demonstrate knowledge of PAS 2035 requirements, or a CB could assess and retain evidence of the compliance with PAS 2035 of PAS 2030 applicants or certified installers where applicable.

# 2. Scoping

### 2.1 Scope of Accreditation

The criteria used by UKAS for accreditation are ISO/IEC 17065:2012 Conformity assessment – Requirements for bodies certifying products, processes and services: General requirements for bodies operating product certification systems.

The scope of accreditation will also refer to the relevant dated versions of PAS 2030 Specification for installation of energy efficiency measures in existing dwellings and insulation in residential park homes and PAS 2031 Certification of energy efficiency measure (EEM) installation in existing buildings and insulation in residential park homes.

For definition of the scope of certification of PAS 2030 Installation Services, UKAS will use the wording in the list of measures published in PAS 2030. However, the measure code (B1, C2 etc.) will not be used on UKAS schedules to aid revision when the measures in PAS 2030 are revised.

From time to time PAS 2030 will be revised and measures added or removed. UKAS schedules will require amending for the latest edition of PAS 2030 and new measures, subject to application for extension to scope by the Certification Body.

Within these broad scope definitions there are sub scopes for which different competencies may be required. Certification Bodies will have to demonstrate competence for all of the sub scopes in order for to be accredited to a broad scope.

The scope of accreditation for certification of Green Deal Advice Services will be the BEIS Specification for Organisations providing the Green Deal Advice Service and Specification for Certification Bodies certifying the Green Deal Advice Service and expressed as domestic and/or non-domestic (Levels 3, 4 or 5). These will be amended from time to time and hence the UKAS schedules will also need to be amended.



### 2.2 Scope of Certification

The product certification documents issued by Certification Bodies (CBs) are required to comply with clause 7.7 of ISO/IEC 17065:2012.

#### PAS 2030 Installations

The function of the CB is to evaluate the service provided by the installers to install energy efficiency measures against the requirements of PAS 2030. The CB evaluates the installer's competence to provide this service, of which installed measures are an integral part, against PAS 2030 and by undertaking periodic surveillance of their work.

The accredited certificate issued by the CB to the organisation that installs the PAS 2030 measures may make the following statement:

This is to certify that the installation service provided by XYZ (name of the organisation) has been assessed as competent to install the following energy efficiency measures in accordance with the requirements of PAS 2030: 2019 (List measure(s))

XYZ (name of the organisation) is subject to periodic surveillance and is licensed to use the mark of the CB (name of the CB) Trustmark Quality Mark and Green Deal Approved Mark.

#### **Green Deal Advice Services**

The function of the CB is to evaluate the Green Deal Advice Services provided by the GDAO and certify the service provided by that organisation. The CB evaluates the organisation's conformity with the requirements of BEIS Specification for the organisation providing Green Deal Advice Services. As of July 2021, there are no UKAS accredited Green Deal Advice CBs – it is not expected that this activity will resume due to the current status of the Green Deal Scheme. However, the Green Deal Advice scheme has not yet been formally closed by BEIS

The accredited certificate issued to the organisation providing the Green Deal Advice Services by the CB may make the following statement:

This is to certify the Green Deal Advice Services provided by the XYZ (name of the organisation) for \*domestic and \*non-domestic sector(s) are in accordance with the requirements of BEIS Specification for organisations providing Green Deal Advice Services (latest version)

\*delete as appropriate

XYZ (name of the organisation) is subject to periodic surveillance and is licensed to apply the mark of the CB (name of the CB) and the Green Deal Quality Mark.



### 3. Assessment Criteria

- 3.1 The following criteria are used as appropriate for assessment of PAS 2030 Certification Bodies certifying services of installers and/or advisors.
  - ISO/IEC 17065 Conformity assessment Requirements for bodies certifying products, processes and services
  - PAS 2030 Specification for the installation of energy efficiency measures in existing dwellings and insulation in residential park homes (Published by BSI - current version Edition 5 2019)
  - PAS 2031 Certification of energy efficiency measure installation in existing buildings and residential park homes (Published by BSI - current version 2019)
  - Specification for Organisations providing the Green Deal Advice Service (Published by DECC - current version 005-2014)
  - Specification for Certification Bodies certifying the Green Deal Advice Service (Published by DECC - current version 205-2014)
  - Green Deal Code of Practice (Published by BEIS current version 5: 28.06.17) compliance assessed by GDORB not UKAS
  - Microgeneration Installation Standard MCS 023: Additional Requirements for MCS Contractors to demonstrate PAS 2030 equivalence for the installation of Microgeneration technologies (MCS issue 2.2 2019)
  - PAS 2035 retrofitting dwellings for improved energy efficiency -Specification and guidance published by BSI first edition June 2019

# 4. UKAS Assessment of Competence of Certification Body Personnel

All of the scopes for which the CB has applied will be assessed by the UKAS assessment team at the initial assessment, with some of these scopes being witnessed. A clustering approach has been adopted to allow for witnessed assessment of a reasonable coverage of the measures included in a Certification Body's accredited scope over the accreditation cycle. The clusters are based on PAS 2030:2019 Annexes to reflect the Energy Efficiency Measures (EEMs) (see Appendix 2) and the assessment approach is detailed below.

The CB must demonstrate that they have competent personnel for evaluation, certification decision making and technical management for all the scopes for which they have applied. During the office assessment the UKAS assessment team will examine competence criteria, competence records, records of previous inspections/audits and other evidence to establish the Certification Body's capability to certify all the scopes for which they have applied. The assessment team may also conduct interviews to establish technical knowledge of personnel.

UKAS will not assess the competence of each and every person (by witnessing) for each and every installation activity that the Certification Body is to certify, as it would it be impractical unless it is a very small CB with a very limited scope. The assessment of competence of the CB is based on sampling and by the use of different assessment techniques, of which witnessing is one. UKAS reserves the right to increase or decrease the number of witnessed audits / inspections performed on site depending on the results of the assessment activities.

If the initial assessment of practical technical competence for installation of a particular measure is to be based on simulated work until such time as actual work is available for on-site assessment, such an approach would be acceptable provided this is clearly described in the Certification Body's procedures, the robustness of such a mock assessment is demonstrated to UKAS and there is a mechanism in place for the installer to notify the Certification Body when the first job is available. UKAS will assess any such alternative approaches by Certification Bodies on a case by case basis.

Some of the techniques that UKAS will use during assessments are as follows.

- Technical interviews
- Review of past reports
- Audit of CB's competence management process (e.g. adequacy of competence criteria (MTCs), training material/training records of evaluators/inspectors, CB's assessment of evaluators/inspectors, competence of those who evaluated them, the authorisation process, continuing professional development, CB's on-going monitoring of evaluators/assessors)
- Review of records
- Verification of information
- Vertical / horizontal audits of processes

#### On-going assessment activities

The extent of sampling and witnessing during surveillance activities is detailed in UKAS Forward Plans. Generally, all the GD clusters applicable are assessed during the 4-year accreditation cycle and at least one category is witnessed at each surveillance assessment.

# 5. Assessment Reporting

The UKAS assessment report will clearly indicate how the assessment team has established the competence of the Certification Body to inspect and certify each of the scopes that UKAS assess. The assessment techniques used for assessing each scope, i.e. witnessing, interviews, review of past reports, examination and verification of competence records etc., as well the conclusions of the assessment team against each of the scopes assessed will be reported.



# 6. Assessment Approach - Detailed Points

# 6a. Certification of Existing Customers by Accredited Certification Bodies

The following guidance is provided to clarify the process that should be followed by ISO/IEC 17065:2012 accredited Certification Bodies (CBs) for existing customers who wish to have accredited certification for work that they will undertake against the requirements of PAS 2030. For the purpose of this communication, the term "existing customers" refers to those customers who have already been members of a previous scheme operated by a Certification Body.

It is fundamental to accredited certification that a certificate with the UKAS mark is only issued when the Certification Body has satisfied itself that the certified organisation has demonstrated that it meets the requirements of the scheme. Any form of "automatic" or "provisional" accredited certification is not in accordance with the principles of accreditation and thus not acceptable. CBs should therefore only grant accredited certification to organisations that have demonstrated compliance with all the requirements of PAS 2030.

However, UKAS recognises that members of most existing schemes will have undergone some form of assessment prior to membership or certification. Where compliance with requirements has already been assessed (within an acceptable periodicity for assessment) then there would be no need for this assessment to be repeated prior to grant of accredited certification. Where there are requirements that have not been assessed within such timeframes (such as the additional management reporting in the core text of PAS 2030), UKAS would expect Certification Bodies to carry out a gap analysis to determine the amount of assessment required. If there has been no previous recent assessment carried out, an assessment against all requirements would need to be done. Accredited certification can be granted only when this assessment has been successfully completed and any nonconformities have been addressed by the organisation. If the gap analysis reveals that the remaining work is low risk, then a CB may wish to justify why this could be done by desk top review and verified at the next visit to the organisation. However, if the gap analysis reveals that there are significant requirements to be verified and thus assessment work to be done, this is likely to necessitate a visit to the client, depending on the nature of the assessment work to be done.

There could be considerable flexibility in how installers demonstrate that they have met the scheme requirements. Smaller organisations will in general need less complex management systems, and UKAS would expect Certification Bodies to be pragmatic and flexible in their assessment approach. It should be noted however that ISO/IEC17065:2012 clause 4.2.6 does not allow the CB to provide such consultancy advice. A specimen form included as Annex G in PAS 2030 might prove to be a helpful tool for some installation companies to use to demonstrate compliance with the record-keeping requirements of PAS 2030. However, they would still need a procedure (PAS 2030 Clause 6.11) to describe their specific arrangements for this activity.

In addition, if there are no PAS 2030 customers, an organisation may only be able to demonstrate how they intend to carry out and record their work, rather than to be able to provide actual records of any work that has been done. This would be acceptable subject to verification when records are available.

#### **Installation Service Process Evaluation**

During this evaluation process the Certification Body shall confirm that the installation process, process management, service provision and claims of compliance for the measures for which the installer has applied for certification, comply with PAS 2030.

It has been agreed that, for smaller organisations, this evaluation may take place at the installer's registered business or at another suitable and agreed location, such as a training venue, provided that a complete evaluation can be undertaken of the applicant installer as outlined in PAS 2031. It is also possible that installers could draw on templates provided by trade associations or other bodies, subject to the Certification Body being satisfied that these have been integrated appropriately within the installer's business. Accredited Certification Bodies are not permitted to provide templates to installers for this purpose.

### Installation Service Delivery Evaluation (on-site assessment)

During this evaluation process, the Certification Body shall confirm the delivery of the installation service through on-site evaluation of installation activity in relation to each of the measures for which the installer has applied for certification.

The Certification Body shall define the timescales for the on-site evaluation to take place, which should not exceed three months of the certificate being issued. If the installer has not been able to provide a PAS 2030 installation for evaluation within the defined timescales, the PAS 2030 certificate shall lapse, and the PAS 2030 authorisation shall be removed.

# 6b. Communication between UKAS and the Green Deal Oversight and Registration Body (GD ORB)

The Department for Business, Energy & Industrial Strategy (BEIS) has appointed the Green Deal Oversight and Registration Body (GD ORB).

From time to time UKAS will be required to provide information regarding the accreditation of individual Certification Bodies to the GD ORB) which would normally be confidential between UKAS and the Certification Body. This may concern information about sanctions, complaints, extensions or reductions in scope and significant changes to the organisation. GD ORB are acting on behalf of the Secretary of State in relation to carrying out certain administrative duties for the Green Deal and therefore UKAS is confident that any information provided will be treated in strictest confidence, apart from that in the public domain.

GD ORB has set up and maintains registers for Green Deal Providers, Installers, Advisors and Certification Bodies. Most of the information recorded by GD ORB will already be in the public domain; for example, the information relating to Certification Bodies is mostly contained in the accreditation schedules on the UKAS website.

UKAS has agreed to notify GD ORB when a Certification Body is accredited for the PAS 2030, or when its accreditation status changes, e.g. scope extension or sanctions. This is done by sending a copy of the accreditation schedule to GD ORB.

CIS 8 Edition 2

# 6c. Assessment of Competence of Installation Organisation Personnel by the Certification Body

The Technical Annexes to PAS 2030 permits one route to competence, which requires the completion of a relevant vocational qualification However, UKAS notes that qualifications and/or experience do not in themselves guarantee competence.

It has been claimed that some Certification Bodies are accepting a letter from the installation organisation, confirming that all their employees meet the relevant PAS 2030 competence criteria, without performing any checks of either the organisation's competence process, competence records, or performing witnessed assessments on a sample to check implementation. This is not acceptable.

In surveillance visits of accredited Certification Bodies, and in assessments of applicant Certification Bodies for the PAS 2030, UKAS will ensure that this aspect is covered, and relevant comments made in the assessment report.

There is also at least one ISO/IEC 17024 route to demonstration of competence for provision of Green Deal Advice.

# 6d. Impartiality

It is a requirement that PAS 2030 CBs demonstrate through an analysis, to the satisfaction of the assessment team, how any conflicts of interests or threats to impartiality are eliminated or reduced to an acceptable level. Where there are related bodies, the analysis should include any conflicts of interests arising from the activities of such related bodies.

The GD Code of Practice requires CBs to provide help and advice to their certified organisations and their employees, but such help and advice must not cause any conflict of interest with their certification activities. In particular, the Certification Body must not provide specific advice or solutions, including templates, (consultancy) to their customers that would cause a conflict of interest with their certification activities.

# 6e. Microgeneration

Microgeneration measures are included in the Green Deal and ECO, but not in PAS 2030. To install PAS 2030 generation measures installers must be MCS-certified and must also comply with MCS 023 "Additional Requirements for MCS Installation Companies to become Green Deal Authorised" Issue 2.2.

To be accredited under MCS a Certification Body needs an assessment against the relevant requirements of the MCS scheme.

For PAS 2030 installations, MCS accredited Certification Bodies must also have an extension to accredited scope to certify to MCS 023. They can then claim accreditation for the PAS 2030, but only for those measures that have been assessed against the MCS requirements.



# 6f. PAS 2030 Registration for Gas Safe Registered Businesses

On 3 September 2012 the GDORB wrote to Gas Safe Registered Businesses, Gas Certification Bodies and Training and Assessment Centres to provide a clarification in relation to the certification requirements for Gas Safe registered businesses under the Green Deal, as follows:

- 1. The technical requirements for installers under the Green Deal are set out in the BSI standard PAS 2030;
- 2. Certification to PAS 2030 is required in addition to holding current certificates of competence and Gas Safe registration;
- Installation companies are required to sign up to the Green Deal Code of Practice, which sets
  out the obligations around the conduct of Green Deal participants, such as selling practices
  and contracting.

The assessment by PAS 2030 Certification Bodies of companies installing gas measures will include an assessment of compliance with gas safety regulations. Therefore, it has been agreed that Gas Safe registration for relevant types of work will be accepted as a method for demonstrating compliance with the gas safety elements of PAS 2030. However, the installation company will still be required to be certified against PAS 2030 (in particular the quality management systems and installation processes requirements) by a Certification Body accredited by UKAS.

In addition to this communication from the GDORB, it is noted that, as well as an assessment of compliance with gas safety regulations, the assessment by PAS 2030 Installation Certification Bodies of companies installing gas measures will include the standards, specifications, instructions or guidance identified in C1 of Annex C, at an on-site assessment.



# Appendix 1. Measure-Specific Annex Selection and Co-Installation Requirements Refer to PAS 2030 and PAS 2035

# **Energy Efficiency Measures**

PAS 2030 Annex B (normative) BFM energy efficiency measures

B1 Measure BFM.1 Cavity wall insulation including that installed in party walls

B2 Measure BFM.2 Draught proofing

B3 Measure BFM.3 Energy efficient glazing and doors including replacement insulating glass units (IGU)

B4 Measure BFM.4 External wall insulation

B5 Measure BFM.5 Flat roof insulation

B6 Measure BFM.6 Floor insulation

B7 Measure BFM.7 Hybrid wall insulation

B8 Measure BFM.8 Internal wall insulation

B9 Measure BFM.9 Loft insulation

B10 Measure BFM.10 Pitched roof insulation

B11 Measure BFM.11 Solar Blinds, Shutters and Shading Devices (internal and external)

B12 Measure BFM.12 Room in roof insulation

B13 Measure BFM.13 Park Homes Insulation



# PAS 2030 Annex C BSM energy efficiency measures (normative)

- C1 Measure BSM.1 Condensing boilers, natural gas-fired and liquefied petroleum gas-fired
- C2 Measure BSM.2 oil-fired condensing boilers
- C3 Measure BSM.3 Flue-gas heat recovery devices
- C4 Measure BSM.4 Heating system insulation (ducting, pipes and cylinders)
- C5 Measure BSM.5.1, 5.2, 5.3, 5.4, 5.5 Heating, hot water system, ventilation and air conditioning, controls and components
- C6 Measure BSM.6.1 Hot water systems
- C7 Measure BSM.7.1 Mechanical Ventilation with Heat Recovery
- C8 Measure BSM.8 Under-floor heating
- C9 Measure BSM.9.1, 9.2 Warm-air heating systems
- C10 Measure BSM.10 Water efficient taps and showers

### PAS 2030 Annex D BSE energy efficiency measures (normative)

- D1 Measure BSE.1.1, 1.2 Electric storage heaters (including electric warm air heating units that incorporate heat storage)
- D2 Measure BSE.2 Lighting fittings, lighting systems and lighting system controls



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# Appendix 2. Clustering PAS 2030 EEM Installation Scopes for Assessment

The following table represents the EEM technical clusters that will be used by UKAS for assessment purposes in order to ensure that each technical area is covered effectively. It is expected that each cluster for which the Certification Body is accredited for will be the subject of an on-site witnessed assessment at least once during the four-year accreditation cycle. CB competence for each measure will be assessed during the head office assessment – each technical area will be assessed at least once during the four-year accreditation cycle at the CB head office assessments. For initial accreditation and extensions to scope UKAS will witness one measure in each cluster and assess the others over the four-year cycle. UKAS will only assess those measures on the Certification Body's scope of accreditation.

The following EEM clusters have been developed to align with the current CPS clusters (see UKAS publication CIS 7 UKAS Approach to Accreditation of Competent Person Scheme Operators Edition 2 October 2019) and the PAS 2030:2019 Annexes where possible.

	Types of Work	EE Measures
1.	Installation of insulation in existing buildings	Cavity wall insulation including that installed in party walls     External wall insulation     Internal wall insulation     Hybrid wall insulation (not including flexible thermal linings)     Loft insulation     Floor insulation     Flat roof insulation     Pitched roof insulation
2.	Installation of gas-fired combustion appliances	<ul> <li>Condensing boilers (natural gas-fired and liquefied petroleum gas-fired)</li> <li>Flue gas heat recovery devices (devices for use with gas-fired condensing boilers (domestic scale))</li> <li>Radiant heating natural gas-fired and liquefied petroleum gas-fired radiant heating systems</li> <li>Natural gas-fired and liquefied petroleum gas-fired warm air heating systems</li> </ul>
3.	Installation of oil-fired combustion appliances	<ul> <li>Condensing boilers</li> <li>Radiant heating</li> <li>Oil-fired warm air heating systems</li> </ul>
4.	Electrical installations in dwellings	Light fittings, lighting systems and lighting system controls Variable speed drives for fans and pumps (nondomestic) Solar blinds, shutters and shading devices (internal and external) (electrically operated devices) Electric storage heaters (domestic and non-domestic) including electric warm air heating units that incorporate heat storage
5.	Installation of heating and hot water systems	Heating and hot water system controls     Hot water systems     Under-floor heating     Heating system insulation (cylinder, pipes)
6.	Installation of mechanical ventilation and air-conditioning systems	Mechanical ventilation with heat recovery     Air conditioning controls     Ventilation system controls     Chillers
7.	Installation of plumbing and cold-water supply systems	Water efficient taps and showers

	Types of Work	EE Measures
8.	Installation of replacement windows, doors, roof windows or roof lights	Energy efficient glazing and doors including replacement insulating glass units (IGU)
9.	Solar blinds, shutters and shading devices	Fixed devices and mechanically operated devices
10.	Room in roof insulation	Additional requirements for room-in-roof insulation including insulation of heat loss elements
11.	Park homes insulation	All insulation measures associated with park homes installed on/in a park home

# Future measures to be added to future editions of PAS 2030

Further revisions will take place to PAS 2030. There will therefore be a need for PAS 2030 Certification Bodies to apply for extensions to scope in the future. UKAS will need to review the changes and determine the extent of assessment needed for the new measures.