



UK Government

# Certification Requirements for Clean Heat Schemes Consultation

*Proposals to require the Microgeneration  
Certification Scheme (MCS) as the sole  
certification scheme for UK government clean  
heat schemes*

Government Response

October 2025



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# Background

This document sets out the government's response to Part 2 of the consultation on the Boiler Upgrade Scheme (BUS) and certification requirements for clean heat schemes, which was published on 30 April 2025 and closed on 11 June 2025.

It does not repeat the content of the consultation document in full, and therefore this government response and the consultation document should be read together.

A separate response will be published to Part 1 of the consultation on the Boiler Upgrade Scheme.

# Summary of stakeholder responses to the consultation

**Question 1: What are your views on the current position in relation to the Boiler Upgrade Scheme, the Warm Homes: Social Housing Fund and the Warm Homes: Local Grant i.e., allowing for MCS or equivalent in relation to certification of clean heat products, installers and installations? Please make clear in your response if your views apply across all schemes, or refer to a specific scheme/schemes.**

We received 193 responses to this question. Most respondents expressed views in support of the current position which allows for MCS or equivalent certification. Respondents noted the need for competition and some raised concerns about giving MCS an effective monopoly. Respondents highlighted several benefits of allowing competition, including that it might drive better standards for customers and more efficient costs for installers. Similarly, respondents highlighted that removing competition could limit innovation, result in less choice for installers and consumers, drive-up prices, and make it more difficult for new businesses to enter the market. It was also noted that multiple certification schemes are needed to deliver a mass market transition to heat pumps and that relying solely on MCS would create a single point of failure. Respondents noted the need to set out criteria that a scheme would need to meet to be recognised as equivalent to MCS. Suggested criteria included that schemes must meet or exceed current standards and be recognised by UKAS.

Some respondents expressed support for a single certification scheme, noting that it would provide simplicity for consumers and installers, and that multiple standards could lower quality, risk introducing further inconsistency into consumers experiences, and add further confusion to the consumer protection landscape. It was suggested that consumers struggle to know what to look for when choosing a tradesperson, and that having competition in this sector is not beneficial. One respondent noted that there was already choice for installers under MCS, as they can pick their Certification Body. Respondents also noted that government would need greater oversight over MCS, with a few suggesting regulating MCS or bringing it into government.

The performance of MCS was raised by respondents across both those that supported the current position and those that supported a single certification scheme. This included concerns that MCS certification can be costly and burdensome for installers, particularly smaller businesses, that it did not always ensure high quality installations and protect consumers, that it did not listen to and reflect installer views, and that it was a blocker to new and innovative technologies.

A few respondents suggested that a certification scheme was not needed at all, and that other mechanisms, such as the Competent Person Schemes, or Local Authority Building Control (LABC) notification and a manufacturer warrantee, would be sufficient.

**Question 2: What are your views on the current position in relation to the Energy Company Obligation which allows for MCS or equivalent in relation to certification of clean heat products for innovation measures, data light measures and standard alternative methodology measures?**

We received 149 responses to this question. Many respondents restated their response to Question 1 and were not specific to the Energy Company Obligation (ECO).

As for Question 1, most respondents expressed views in support of the current position which allows for MCS or equivalent. Respondents raised similar points around the risks of removing competition and giving MCS an effective monopoly. It was noted that this would limit innovation, limit choice for installers and consumers, lead to higher prices, and create a barrier or bottleneck to scaling deployment of heat pumps. In responses that were specific to ECO, respondents said that MCS is a blocker to innovation, and that flexibility is needed to encourage innovation and market growth.

Some respondents expressed views in favour of a single certification scheme, noting the need for simplification and clarity in a complex landscape. One respondent noted that ensuring consumer protections are as simple and easy to navigate as possible was particularly important under ECO, where consumers may be in more vulnerable situations, and may therefore find it more difficult to navigate complex schemes and processes.

**Question 3: What are your views on the advantages that would stem from a sole certification scheme for clean heat measures?**

We received 209 responses to this question. Most respondents highlighted the disadvantages of a single certification scheme, such as its creation of an effective monopoly, preventing innovation and leading to increased prices and limited choices for installers and consumers.

Another disadvantage highlighted was the risk of creating a bottleneck in the certification system, which may lead to a backlog of installers waiting to be certified.

However, some respondents highlighted the advantages of a single certification scheme. Respondents noted that having a single certification scheme simplifies the process for installers and can help to build trust and confidence in the familiar brand. Another advantage indicated was that a single certification scheme ensures accountability with a single point of contact for any problems, making it easier for the Government to regulate.

Respondents noted another advantage of a single certification scheme is that it maintains standards and prevents a 'race to the bottom', as competing schemes might sacrifice quality. Having only one scheme also allows for centralised tracking of clean heat deployment data and outcomes, helping to ensure targets are met. The single scheme would also have greater spending power to reinvest in improving standards and supporting the sector.

Additionally, it was noted by a few respondents that a sole scheme would need to be managed by government.

### **Question 4: What are your views on the advantages that would stem from a certification system which may include multiple certification schemes for clean heat measures?**

We received 191 responses to this question. Most respondents highlighted advantages to having multiple certification schemes. Some respondents suggested that having competition from multiple certification schemes leads to innovation and improvement, as well as decreasing prices for installers and consumers.

Some respondents noted that allowing for multiple schemes will also prevent bottlenecks and a single point of failure, as installers can go through different schemes to get certified. Rather than all installers following a single scheme and set of standards, installers could choose a scheme that more closely meets their needs. Multiple schemes allow room for specialisation in a specific technology and the raising of standards.

Some responses referenced the disadvantages of multiple schemes. These echoed some of the advantages highlighted in the previous questions, including that consumers and installers can build more trust in a singular scheme. Multiple schemes create a risk of a 'race to the bottom' for standards, and a new certification scheme in the market may not be of the same quality as existing schemes. One response indicated that as consumer awareness and understanding of certification schemes is generally low, certification schemes would be competing to attract installers, possibly lowering requirements to get as many installers' business as possible.

### **Question 5: Do you agree with the proposal to mandate MCS as the sole certification scheme for clean heat installations under government clean heat schemes and remove the option for equivalence? Yes/No. Please provide evidence to support your response.**

We received 248 responses to this question. Of these responses, 62 answered 'Yes', 172 answered 'No' and 14 respondents responded neutrally.

Some respondents who disagreed with the proposal to mandate MCS expressed concerns about MCS acting as a private monopoly, such as potential for influence over regulation and policy, and unfairness for MCS' competitors. Numerous benefits were suggested for a competitive market for certification, including lower prices, higher standards, greater accountability, and more innovation and incentives for improvement. Additionally, these respondents indicated that multiple certification schemes would result in increased industry capacity, potentially allowing for faster growth with lower risk of a bottleneck, while eliminating the risk of MCS as a single point of failure and providing greater flexibility and choice for consumers and installers.

The respondents who did not agree with the proposal also commented on the performance of MCS, including criticism of their record on consumer protection and quality of installations and regarded MCS to have insufficient engagement and transparency with industry stakeholders. Others mentioned the cost and administrative burden of the scheme.

Of those in favour of the proposal, some cited increased simplicity and ease for consumers, with improved consumer protection. Greater clarity for installers with one set of standards was stated as positive in achieving consistent high-quality work while avoiding a 'race to the bottom'. One certification scheme was seen as facilitating greater government and/or regulatory oversight, with Gas Safe given as a comparison.

This support was sometimes caveated with statements regarding MCS's need to raise performance outcomes for installations, increase industry engagement and overall transparency. To avoid slowing industry growth, respondents indicated MCS needed to improve its resourcing, and responsiveness of standards to new technologies.

A few respondents questioned how the proposal to mandate MCS would apply to Shared Ground Loops (SGLs) and heat networks, as these would be subject to the Heat Network Technical Assurance Scheme (HNTAS).

## Government response

Having carefully considered the range of views received, we are planning to proceed with the proposal to mandate MCS as the sole certification scheme for clean heat measures under the BUS, ECO4, Warm Homes: Social Housing Fund (WH:SHF) and Warm Homes: Local Grant (WH:LG), and remove the option for multiple certification schemes to certify installations. To note, this applies to clean heat measures which are currently required to be certified by MCS or equivalent. This does not impact clean heat measures that are not currently required to be certified by MCS, such as heat networks, which will be covered by the forthcoming HNTAS, or any measures that are covered by PAS 2030, such as high heat retention storage heaters. SGLs are, however, within scope as ground source heat pumps require MCS certification. We will continue to keep this requirement under review as the HNTAS is implemented.

As set out in the consultation, this is intended as an interim step ahead of the implementation of longer-term system reforms to the consumer protection landscape<sup>1</sup>. Detail of the proposed system reforms will be set out as part of the Warm Homes Plan.

The Government believes that allowing for equivalent schemes ahead of the implementation of these reforms would add further complexity to the consumer protection landscape and create confusion for consumers. It could also potentially undermine standards, as competing certification schemes may be incentivised to lower prices and/or offer easier or quicker certification, which may result in lower standards, less rigorous assessment and audit, and weakened consumer protection. This would be detrimental to the market. Mandating MCS now will avoid adding further complexity for consumers and reduce impacts on scheme delivery while consumer protection system reforms are developed and implemented.

We recognise that there are concerns that mandating a sole certification scheme will remove competition, and that this could undermine incentives to improve scheme efficiency and the service provided to installers and consumers. The Government considers that in the timeframe ahead of the implementation of system reforms, any benefits of allowing multiple competing certification schemes are unlikely to outweigh the disadvantages.

However, to mitigate the potential risks we are taking steps to increase oversight of MCS. This includes placing a DESNZ observer on the MCS Service Company decision-making board and putting in place a memorandum of understanding between the department and MCS. The MCS Consumer Protection Oversight Panel will also publish an annual report on their consumer protection performance. We will keep this arrangement under review, and consider if further measures are needed to ensure adequate oversight.

We also acknowledge the wider concerns that have been raised about the performance of MCS and the cost and administrative burden associated with MCS certification, particularly for smaller installer businesses. We will continue to monitor the implementation of the redeveloped

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<sup>1</sup> <https://questions-statements.parliament.uk/written-statements/detail/2025-10-13/hcws953>

MCS scheme, which aims to reduce bureaucracy and place greater focus on quality of installations.

Separately, we recently sought views on reducing installer administrative and regulatory burdens with regards to registration of assets, as part of the call for evidence on improving the visibility of distributed energy assets.<sup>2</sup>

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<sup>2</sup> <https://www.gov.uk/government/calls-for-evidence/improving-the-visibility-of-distributed-energy-assets>

## Next steps

We again wish to thank those who took the time to respond to this consultation.

The Government will publish the Scheme Regulations giving effect to these changes in the Boiler Upgrade Scheme. This will be laid in Parliament when parliamentary time allows. Where necessary, memoranda of understanding, Grant Funding Agreements and guidance for WH:SHF, WH:LG and ECO4 will also be updated to remove the concept of equivalence for clean heat measures.

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