Still left out in the cold

Friends of the Earth

An assessment of Irish Government policies and measures to address energy poverty, energy needs and climate action in the residential sector.

Sections 1 and 3 of the report were researched and written by Dr Nat O'Connor, with the assistance of Mary A. Murphy. The interviews and analysis reported in Section 2 were conducted by social researcher Brian Harvey. The recommendations in section 4 are collated from all three preceding sections. The researchers would like to thank all interviewees and those who submitted documents for analysis as part of the research.

This report was commissioned by Friends of the Earth Ireland, as part of a programme coordinated by Clare O'Connor and Jerry MacEvilly, with funding from the European Climate Foundation. It stemmed from an in-depth workshop with civil society in June 2022 on how Ireland can deliver an inclusive response to the energy price crisis while supporting communities. This workshop was organised as part of the 'Our Energy Future' - a project supported by the Renewable Grid Initiative (RGI) and EirGrid to engage communities and groups around the country on Ireland's energy transition. Graphic design and production have been funded by the Mercator Foundation (Stiftung Mercator).

European Climate Foundation

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SECTION 3

SECTION 4

INTRODUCTION Aim of the Research

In 2022, Friends of the Earth commissioned researchers to conduct a mixed method analysis of Government policies and responses to energy poverty, based on the following central question:

How effective are Government policies and responses to energy poverty, and what are the possible policy options that are a win-win for both social justice and climate action? This includes a consideration of policies and responses related to energy efficiency/home heating.

This report aims to identify government policies and/or planned actions that have the most potential to both alleviate energy poverty and achieve the sectoral emissions ceiling for the heat sector in accordance with Ireland's climate obligations, if well implemented. It also aims to identify weaknesses or gaps in government policies and their implementation, and possible policy options or actions which should be adopted to overcome them.

Primary research was conducted by way of interviews and collation of materials from a range of key informants and stakeholders. Eighteen interviews were conducted, in person or via email, and further information was sourced from a range of organisations and academics. Annex 1 lists the questions asked.

Secondary research was conducted to review a selection of relevant policy documents, data, research and other materials. This provided the basis for a descriptive analysis and assessment of energy poverty in Ireland, in the context of the current surge in energy prices as well as Ireland's climate obligations.

Section 1 of this report reviews relevant government policies to ground the research. Section 2 presents the findings of the primary research (interviews and collation of information). Section 3 outlines desk-based research and analysis that provide additional insights, presents a synthesis of the research findings and analyses new government policies (the *Energy Poverty Action Plan* and the *Climate Action Plan 2023*), which were published after the fieldwork for this report was completed. Section 4 provides recommendations.

SECTION 1 Energy Poverty and Emissions

The research examined historical, contemporary and new policy documents, relevant to climate action linked to residential emissions and/or energy poverty. The approach taken was largely descriptive, to summarise the broad thrust of the policies and to identify the specific targets or commitments in relation to home insulation, energy poverty and related matters.

This section summarizes the analysis of historical documents (1.1) and the key current policy documents (1.2). New policy documents are addressed in Section 3.3 as they were published when most of the research for this report had been concluded.

1.1 Connected commitments: climate action and energy poverty reduction

Both climate action and energy poverty are relatively new terms in the history of Irish policymaking. Nonetheless, each has antecedents such as the Environmental Protection Agency Act 1992 or the Combat Poverty Agency Act 1986.

Climate action

From 2007, the Environmental Protection Agency hosted a series of climate change lectures, given by domestic and international experts, to raise awareness of the issue and of the responses needed.[1]

In October 2014, the EU committed to a 40% reduction of greenhouse gas emissions relative to 1990. Also in 2014, Ireland adopted its short National Policy Position on Climate Action and Low Carbon Development, which led to the Climate Action and Low Carbon Development Act 2015.
The key commitment in the policy position was:

> **"an aggregate reduction in carbon dioxide (CO_2) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.[2]"**

The Paris Agreement came into effect in 2016, under which the EU committed to the target of net zero emissions by 2050 and radical reduction of emissions by 2030 to aim to prevent global heating beyond 1.5° Celsius above pre-industrial levels.

In 2017, a Citizens' Assembly considered the topic of *how the State can make Ireland a leader in tackling climate change*, and its final report and recommendations were published in April 2018.[3] Its ancillary recommendation IV was:

> **"All new buildings should have a zero or low carbon footprint and planning permission should only be granted for new builds which comply with these requirements. The government should provide incentives to retrofit homes to achieve better energy efficiency ratings."**

Subsequently, a special Oireachtas Committee on Climate Action sat between August 2018 and January 2020 to consider the Citizens' Assembly's report and recommendations, resulting in the publication of *Climate Change: A Cross-Party Consensus for Action*.[4] Their recommendations, relevant to residential emissions, included:

- For the Minister for Housing to set a minimum Building Energy Rating (BER) of C for residential rental properties by 2030.
- "The Department of Communications, Climate Action and the Environment with the SEAI and the Department of Housing, Planning and Local Government (DHPLG) should urgently carry out a needs assessment in order to determine the requirements for the delivery of the Government's target of retrofitting 45,000 homes per annum from 2021 and explore increasing it incrementally to 75,000 homes."
- Revise and enforce building regulations to require the Net Zero Emissions Buildings (NZEBs) standard by 2020.

Ardnacrusha hydroelectric power plant

In terms of overall emissions, the Oireachtas report noted the following:

> **"The IPCC Special Report on Global Warming of 1.5°C (SR1.5) released in October 2018 shows that to keep the global mean temperature rise below 1.5°C requires global GHG emissions reductions from 2010 levels of 45% by 2030 and to be net-zero (full decarbonisation) by 2050. That report has proved a game changer that calls for action on an economy-wide scale. For Ireland, it means Ireland's emissions should be about 33 million tonnes of carbon dioxide equivalent [CO2-eq] in 2030 compared to 60 million tonnes in 2017."**

The Climate Action and Low Carbon Development (Amendment) Act 2021 substantively amended the 2015 Act. Among other things, it provided for carbon budgets and emissions ceilings for different sectors of the economy.

In July 2022, the Government agreed a reduction of emissions of 51% relative to 2018, to be achieved by 2030, and the introduction of five-year carbon budgets, the first of which was to run from 2021 to 2025, requiring an annual reduction of 4.8% of emissions, followed by the period 2026-30 where an annual average reduction of 8.3% was mandated. Among the sectoral emissions ceilings was the requirement to reduce residential emissions from 7 million tonnes CO2-eq in 2018 to 4 million tonnes by 2030, with an indicative intermediate target of reducing to 5 million tonnes by end-2025.[5]

The overall sectoral emissions ceilings acknowledged Ireland's legally binding emissions reduction target, which is to reduce all emissions to 34 million tonnes by 2030.

Energy poverty reduction

In earlier decades, energy poverty was addressed through a combination of energy security policies and generic welfare policies focused on income. Domestic fireplaces were perceived as necessary for energy self-sufficiency, as was peat extraction, although from the outset the state was capable of experimentation in radical alternatives, such as the Ardnacrusha hydroelectric power plant in 1929 and the collective heating plan in Ballymun in 1966, which was the largest such scheme in Ireland or Britain, supplying underfloor heating to 3,000 flats.

The state has always provided some level of social welfare cash payment to those without means, such as the State Pension. Over time, the state developed supplementary payments intended to meet particular needs, including payments and schemes focused on specific forms of poverty such as energy poverty. In 1942, Ireland introduced a Cheap Fuel Scheme. In 1968, a "free electricity allowance" came into operation, "which granted 'relief from the fixed charge for the Electricity Supply Board's domestic consumer tariff and up to 100 units of electricity free of charge in each two-monthly accounting period'. By Budget 2008, the allowance covered 2,400 units per year, which was lowered to 1,800 units in mid-2011. In 2013, the structure of the allowance was changed from a set quantity of units to a cash amount."[6] The Electricity Allowance or Gas Allowance is part of the Household Benefits Package.

The Fuel Allowance scheme was introduced in 1988, "to assist qualified households in receipt of certain social welfare payments with their heating costs. The allowance represents a contribution towards a person's normal heating expenses. It is not intended to meet those costs in full."[7]

The first reference to 'fuel poverty' in *The Irish Times* was in 1987, under the headline 'Politicians attack "miserly" £5 heating allowance', followed in 1993 by "Report criticises energy policy" and in 1994 "Insulation of homes could create jobs, report says".[8] The earliest reference to 'fuel poverty' in the Oireachtas debates is in 1996, by Trevor Sargent TD:

> **"Mr. Sargent asked the Minister for Transport, Energy and Communications if his attention has been drawn to a recent report by Energy Action which estimates that 300,000 people on low incomes live in badly insulated, inadequately heated homes and that Ireland's imported fuel bill could be cut by £50 million if every home was properly insulated and efficiently heated; and the plans, if any, he has to enact in response to these revelations."**

The reply of then Minister, Michael Lowry TD, noted the funding from his department in support of Energy Action and included the remark that:

> **"Fuel poverty is not an issue which falls exclusively into the remit of any single Department. The complexity of this issue, in my view, demands cross agency and cross departmental action."**

The term 'energy poverty' was not mentioned in the Oireachtas until 2005, in the context of an energy policy review by the Committee on Communications, Marine and Natural Resources. The first mention of the specific term in *The Irish Times* is in 2006.

Combat Poverty and Sustainable Energy Ireland (SEI) established a Fuel Poverty Action Research Project in the period 2008-09 "to inform public policy on the merits of domestic energy efficiency programmes".[9] It led to the publication of a series of reports on the effectiveness of domestic energy-efficiency programmes. Building on what it described as the "scarce" literature on fuel poverty in Ireland, the research assessed the benefits of the SEI-

administered Warmer Homes Scheme. It concluded that the interventions under the scheme "have brought health, thermal comfort and economic benefits to households". The evidence also suggested "a significant fall in the proportion of intervention households classified as suffering from fuel poverty."[10]

Ireland's first strategy to address energy poverty was in 2011, followed in 2016 by *A Strategy to Combat Energy Poverty 2016-2019*. This was launched by Minister for Communications, Energy and Natural Resources, Alex White TD, and accompanied at launch by a research report, *Bottom-up analysis of fuel poverty in Ireland*.

Strategy to Combat Energy Poverty 2016-2019

The 2016-2019 *Strategy to Combat Energy Poverty* was the second such strategy by an Irish government and, like its predecessor, was framed in part as a response to the economic collapse post-2008, during which a significant number of households were thrust into energy poverty. This also leant itself to the strategy's position that energy poverty is closely tied to other forms of poverty and deprivation generally. It endorsed an expenditure method of measuring energy poverty.

The strategy is justified on two grounds: firstly, that the state has a duty of care to vulnerable members of society; and secondly, that reducing energy poverty will reduce related costs to the state, particularly in healthcare. The strategy placed less emphasis on but still acknowledged the climate justifications for pursuing a more energy efficient housing stock.

The strategy acknowledged the need for developing a method of improving the energy efficiency of housing stock in the private rental sector, and it committed to conducting an impact analysis of the introduction of a minimum BER for the sector. It also set out a scheme for retrofitting homes of older persons with chronic conditions and committed to a review of the impact of the Energy Efficiency Obligation Scheme on energy poverty. It also recommended the establishment of an Energy Poverty Advisory Group, in part given the difficulty in defining and measuring energy poverty.

Bottom-Up Analysis of Fuel Poverty in Ireland

This analysis was published in 2015 to support the 2016-2019 energy poverty strategy. The method adopted to measure fuel poverty was to compare 'normative' fuel expenditure (that is, how much would need to be spent on fuel to achieve set conditions in the home) to household income levels. This was different to approaches used in previous studies of fuel poverty in Ireland, namely self-reporting and comparing actual fuel expenditure to household income levels. It provided information on three alternative thresholds for fuel poverty: spending 10%, 15%, or 20% of the household income on fuel. It placed most emphasis on the 10% threshold. Notably, this research found higher levels of fuel poverty than the research that relied on self-

reporting, though this may be because the research that relied on self-reporting was conducted some years previously.

The report broke down its findings across six variables: location; dwelling type; main heating fuel; building energy rating (BER); tenure; and employment type. It found that households in rural locations experienced more fuel poverty than those in urban areas; that households in detached homes were most likely to experience fuel poverty across dwelling tys; that those reliant on oil and solid fuels were more likely to experience fuel poverty than households relying on other heating fuels; that there was an obvious correlation between BER and fuel poverty; that households in the private rental sector were somewhat more likely to be in fuel poverty than those who owned their homes; and those in social housing were significantly more likely to be in fuel poverty than households with other tenure statuses; and that households with members who were retired, unemployed, or otherwise not in the labour force experienced more fuel poverty than those in employment, including self-employment. Across all cohorts, those in social housing were the most likely to qualify as experiencing fuel poverty at almost 70% (based on the 10% threshold).

The report ended by noting ways in which the research could be refined or developed, notably through better data on income across the key variables.

Climate Change: A Cross-Party Consensus for Action

The 2019 Oireachtas Committee report, *Climate Change: A Cross-Party Consensus for Action,* included extensive references to poverty. Inter alia, it recognised that:

> **"Those experiencing energy poverty tend to live in homes with poor energy performance and are more exposed to negative health impacts associated with cold and damp living conditions. Dealing with energy poverty requires a multi-faceted set of policy measures. While energy efficiency improvements alone are not sufficient to lift a household out of poverty, improving the energy performance of a home should reduce the energy bill and improve the health conditions within the household."**

The report recommended that increases in carbon price should only occur when there is an evidence-based plan for climate actions including the protection of those most vulnerable to energy poverty. It also called for an immediate review of fuel poverty.

1.2 Current policy

Policy documents examined:

- *Roadmap for Social Inclusion 2020-2025*
- *Housing for All*
- *National Retrofit Plan*
- The Energy Efficiency Obligation Scheme (EEOS)
- *National Energy Security Framework*
- Budget 2023 announcements
- *Strategy to Combat Energy Poverty – Progress Review and Public Consultation*

Roadmap for Social Inclusion 2020-2025

The previous *National Action Plan for Social Inclusion* 2007-2016 named fuel poverty in the context of income supplements and home insulation schemes.[11] Its successor, the *Roadmap for Social Inclusion 2020-2025* frames fuel poverty in the context of its seventh of seven high level goals, to ensure that all people can live with confidence that they have access to good quality healthcare, housing, energy and food. The roadmap notes that the state provides direct income supports or subsidies based on energy or fuel (e.g. Fuel Allowance), and it also notes that:

> **"the efficient use of energy can permanently reduce deprivation in a manner that cannot be achieved by income supports. For example improving a building energy rating of a home from E1 to B2 can generate annual savings to the household of €2,524 per year."[12]**

To this end, the roadmap names the Better Energy Warmer Homes scheme and the pilot Warmth and Wellbeing scheme that provides deep interventions for people in energy poverty suffering from acute health conditions. Of the 69 commitments in the roadmap, one (no. 60) relates to energy poverty: "As part of the *Climate Action Plan*, review ways to improve how current energy poverty schemes target those most in need."

The headline ambition for 2025 in the roadmap is to reduce the national consistent poverty rate to 2% or less of the population. Consistent poverty is defined as "the proportion of people, from those with an income below a certain threshold (less than 60% of median income), who are deprived of two or more goods or services considered essential for a basic standard of living."[13] There are eleven deprivation items, of which two are related to energy poverty: if a person had to go without heating during the last year through lack of money or was unable to afford to keep the home adequately warm. As such, achievement of the headline target of reducing consistent poverty should reduce energy deprivation.

In 2021, the rate of consistent poverty was 4%.[14] In 2022, deprivation rose to 17.1% from 13.8% the previous year, and it is likely that this will drive an increase in consistent poverty, which will become known when the figures for 2022 are published

Housing for All

Housing for All is the Government's housing plan 2021-2030.[16] There are quarterly progress reports published under it. It contains 213 different actions which are categorized as short, medium, or long term. Given its broad remit, it covers many different topics and assigns responsibility for different actions to several departments and state agencies, including on occasion requiring cross-departmental collaboration. €12 billion has been made available

under it for 2022-2025. It states that "all of the new homes built during the lifetime of this Plan will be built to Nearly Zero Energy Building (NZEB) standards." Otherwise, by and large, the issues of energy poverty, climate justice, and just transitions are only addressed in this plan with reference to retrofitting.

The plan is divided into four pathways, and its discussion of retrofitting is contained under the fourth pathway, "Addressing Vacancy and Efficient Use of Existing Stock." Supports for retrofitting are intended to improve older vacant stock. Climate concerns are not discussed in the second pathway, which is concerned with supporting social inclusion (although one of the actions under the second pathway is to introduce a minimum BER in the private rental sector). After outlining these pathways, the plan dedicates a section to discussing supporting these pathways to enable "a sustainable housing system". Ensuring environmental sustainability is part of this, and includes the commitment for 500,000 houses and 36,500 local authority houses to be retrofitted by 2030. Aside from actions to do with retrofitting, relevant actions pertain to supporting a labour force that can enable a low car bon economy.

According to the quarterly update reports, many of the actions related to retrofitting are behind schedule or, if now complete, were completed after their initial deadline.[17]

National Retrofit Plan

The *National Retrofit Plan*[18] was published as part of the *Climate Action Plan 2021: Securing Our Future.*[19] The process of designing the plan involved consultation with stakeholders including industry and homeowners, and examination of international experience. It contains 22 actions across four pillars. Its over-arching commitment is to retrofit 500,000 houses by 2030, as specified in the *Housing for All* plan. This will be partially achieved through installing 400,000 heat pumps also by 2030. The plan relies heavily on heat pump technology as a means of improving the energy efficiency of Irish housing stock.

The plan is divided into four pillars: driving demand and activity; financing and funding models; supply chain, skill and standards; and structure and governance. Each of these raise issues relevant to combatting energy poverty and decarbonisation. These pillars are also inter-related and to illustrate this the plan presciently states that there is no benefit to driving demand if the supply is not available.

The plan addresses the disproportionate focus on energy efficiency as a benefit of retrofitting and lists other similarly important benefits, for example, affordability, environmental sustainability, and health protection. It puts forward five guiding principles: fairness; universality; being customer-centric; being cost-optimal; and being industry-led. The plan cites aims related to decarbonisation and social inclusion, as well as economic recovery throughjob creation and stimulating innovation. The principles of fairness and universality manifest in a commitment to ensuring retrofitting schemes are available to all housing and tenure types. One of its aims is to address the "misaligned" incentives between landlords and tenants when it comes to retrofitting. This will in part be achieved through the *Housing for All* action of introducing a minimum BER for the private rental sector.

Energy Efficiency Obligation Scheme (EEOS)

The Energy Efficiency Obligation Scheme (EEOS) requires obligated parties (companies selling large quantities of energy) to meet set targets for assisting customers with energy efficiency projects.[20] This includes homeowners seeking to retrofit. The scheme has been in place since 2014, following the EU Energy Efficiency Directive. It was revised in 2021 so that the targets set for obligated parties are talked about in terms of 'final energy'. This was in response to amendments to the EU directive.

A stakeholder consultation was conducted in 2021 following which the decision was made to require obligated parties to deliver 15% of their target energy savings in the residential sector, and 5% of savings for those in energy poverty.

This will be taken to mean households in local authority owned houses or in houses with a BER of D2 or less, and who are entitled to a welfare payment that would entitle them to the Warmer Homes Scheme. Saint Vincent de Paul in its submission to the consultation strongly urged a higher benchmark than 5% in part as it was inadequately ambitious given that many obligated parties were already projected to exceed that level.

National Energy Security Framework

The *National Energy Security Framework* was published in the context of the war in Ukraine and sets out the structures for managing Ireland's energy security.[21] It provides little in terms of moving away from fossil fuels aside from references to pre-existing policy. It contains 31 "responses", under three themes. Many of these actions emerge from previous policy decisions. The first theme is "managing the impact on consumers and businesses" and gives particular focus to those living in energy poverty. Responses intended to help these people include reducing excise duty on petrol, diesel and marked gas oil; and reducing VAT on gas and electricity bills. More broadly it commits to ensuring the government continually assesses whether and what supports are needed, including welfare supports.

Budget 2023

Budget 2023 took place in extraordinary circumstances.[22] Whereas the two previous budgets were dominated by emergency responses to the COVID pandemic, the 2023 budget occurred in the context of inflation projected to reach 8.5% by end-2022 and 7.1% in 2023, largely driven by energy prices. As of October 2022, the consumer price of energy products was on average 89.2% higher than the base year of December 2016, with almost all the increase having occurred since January 2021.[23]

Measures taken in the previous budget were supplemented during the year by €225 in lump sum payments to Fuel Allowance recipients, a reduction of excise duty and VAT on energy, and a €200 Electricity Credit for domestic accounts.

Budget 2023 set out a range of measures to address the broad cost of living crisis, with specific emphasis on helping households and businesses to cope with energy costs. The Government permitted a 6.5% expansion of public spending, which was an effective cut in real terms in the context of projected inflation of 7.1% for 2023. The 5% expansion of public spending in 2022 and 2021 were also effectively cuts (versus 8.5% and 5.5% inflation respectively), although the 5% expansion in previous years,

against a backdrop of low inflation, represented growth in real terms. Unusually, some of Budget 2023's measures were applied in late 2022 as opposed to 2023, reflecting the urgency of the cost of living crisis.

The budget committed to increasing core social protection rates for pensions and working age payments by €12 in January 2023. This is a cut in real terms, although the severity of the loss of purchasing power was offset by one-off payments received by some households in 2022, including as follows:

- A second double week payment in October in addition to the traditional Christmas bonus,
- A double month of Child Benefit,
- A €500 lump sum for families availing of the Working Family Payment, for carers and for people in receipt of Disability payments,
- A €400 lump sum for recipients of Fuel Allowance,
- A €200 lump sum for recipients of the Living Alone increase.

In addition, a further €600 domestic Electricity Credit was provided, with €200 provided in 2022 and €400 in early 2023. VAT on gas and electricity was reduced from 13.5% to 9% for an average household gain of €64/year. In addition, the Public Service Obligation (PSO) levy was set to zero, saving an average customer around €58/year. The 2022/23 PSO was also calculated as a reverse levy, meaning that customers will receive a PSO payment worth an average of €89.10 on their electricity bills for 2022/23.

Commenting on the Budget measures, the then Tánaiste, Leo Varadkar TD, indicated that the Government was reserving "some financial firepower" to make further interventions during 2023 if necessary, in a similar way to how measures were introduced during 2022 outside of the formal Budget process.[24]

Strategy to Combat Energy Poverty – Progress Review and Public Consultation

The progress review of the *Strategy to Combat Energy Poverty* was published in 2022, three years after the strategy had lapsed.[25] It was published in the context of gas prices rising internationally and the war in Ukraine. This review places greater and more consistent emphasis on the just transition and climate concerns and their connection to energy efficiency and combatting energy poverty than does the original strategy. In particular, it makes the point that becoming less dependent on fossil fuels and generating renewable power domestically will make our energy cheaper and more sustainable into the future. It acknowledges the growing tendency to link climate concerns with energy poverty concerns at the domestic and EU level and identifies the strategy as part of this trajectory. Retrofitting has become central to Irish policy on moving away from fossil fuels. Though it acknowledged the overlap between energy poverty and poverty generally, it prioritized improving home energy efficiency as a solution rather than income supports.

The review itself combined consultation with stakeholders and desk-based research. It reported on 16 actions set out under the strategy, 12 of which were reported as having been completed. Some of these actions were policies being embarked upon anyway, such as maintaining the Fuel Allowance and the Household Benefits Package. Of the four that were not completed, one has since been completed (public consultation on the strategy); one is an ongoing commitment and cannot reasonably be described as completed (ensuring energy poverty policies are evidence-based); and two were accomplished through a different method than originally set out (the strategy called for reporting through annual progress reports, another approach was taken).

SECTION 2 Views on Energy Poverty

This section reports on the primary research conducted for this report.

The research sought external knowledge and perspectives from a range of sources across those familiar with both the energy and social inclusion sides of the issue. Using a common format, requests were sent to named persons in institutions, government departments and agencies, Non-Governmental Organizations (NGOs), universities, technical bodies, public representatives and independent experts, the list being agreed between the researchers and Friends of the Earth (FoE). They were invited to respond as best suited them: in-person or zoom personal interview, phone call and e-mail, with combinations thereof. Many supplemented their views by forwarding already-published documentation. Where they have issued publications in their name, these are identified, but interview comments, verbal or written, were on a not-for-attribution basis and have accordingly been anonymised. Some short quotes have been included to illustrate the nature of their comments.

This section summarizes the findings from the interviews (2.1) and then the findings from the published material supplied (2.2), before conclusions are presented (2.3).

2.1 Findings from the Interviews

The interview contributions are divided into the following sections: context and periodisation; nature of energy poverty, including the groups most adversely affected; policy analysis; particular issues deserving attention; and issues of governance and consultation.

Context and periodisation

Fuel poverty is a distinct issue that emerged in the 1980s, a landmark event being the formation of Energy Action in 1988. Over time, the issue gradually ascended the national policy agenda, with pilot schemes, policies, institutionalization (e.g. Sustainable Energy Authority Ireland/SEAI), service development (e.g. the generic Money Advice and Budgeting Service/MABS), standards (e.g. Energy Efficiency Obligation Scheme/EEOS) and their scaling up to the full-scale response of the present day.

Fuel poverty has been a documented problem nationally for several decades. There have been three important developments in the past fifteen years, each of which worsened fuel poverty. First, the problem deepened during the austerity period (post-2008), when prolonged unemployment and reduced incomes left an overhang of long-term fuel poverty legacy debt. It left a substantial group of middle-aged (41-60), middle-class households of low *disposable* income, still paying off mortgages in owned housing of poor thermal quality, unable to afford improvements and having exhausted their savings. Second, COVID (from 2020) exacerbated the situation, because services helping the fuel poor stopped, in-person help was no longer available, networks of mutual help no longer met and fuel debt accumulated as meters went unread. People spent more time in their own homes – and still do – with increased energy consumption. Third, the war in Ukraine (from 2022) and the subsequent sharp rise in fuel prices caused a fresh rise in presentation to services. The increase in mortgage rates exacerbated the situation, for they have prior call on payment ahead of fuel. The most recent Standards of Income and Living Conditions (SILC) figures found that in this most recent short period being without heating rose from 7.1% to 8.9% over 2021 to 2022; utility bill arrears rose from 7% to 9.2%; and 2022 showed a sharp rise in inability to heat the home, especially for people on low incomes, the unemployed, people with disabilities, the retired, students and those on home duties.[26] For front line services, people presented with a "now-impossible" bills and spoke of cutting out food so as to pay for fuel. Energy spending displaced food spending as the top household outgoing, forcing a choice of *heat or eat*. People went to bed early to keep warm. Increasing energy costs were creating "really desperate situations" for vulnerable households.

Frontline services report that those affected by fuel poverty now comprised both people who have long been trapped in fuel poverty – but for whom the situation is now much worse – and new cohorts. Many came from the private rented sector, some adults and their children having grown up there, especially those with additional health costs, as well as people *in* work. There is a real danger that things will worsen in 2023, as the value of credits and social welfare decrease with inflation, with resulting deterioration in health. There may be increased demand for Additional Needs Payments this year and next to address fuel poverty and this was an indicator to be watched. A particular setback in 2022 was the loss of Energy Action, which was well regarded, practical, knowledgeable, undertook advocacy work, held conferences and worked in a European context.

Positively, Ireland had a number of advantages in tackling energy poverty. We had a younger housing stock compared to the rest of Europe – half built since 1991 – with a young demographic, growing labour force and expanding economy, unlike our neighbour and some European countries. There was hope that inflation would flatten over time, however this has not yet occurred, and official projections are for continued high inflation in 2023.

Nature of energy poverty

There was universal agreement that fuel poverty could not be clinically separated from other aspects of poverty. Issues of fuel poverty, general poverty, energy, housing, heat and energy efficiency were intimately, structurally linked. Energy poverty could not be tackled in isolation and conversely, other anti-poverty policies must be considered in light of their implications for fuel poverty. Interviewees spoke of the interaction of income inadequacy, poor quality housing, inefficient heating systems, the running cost of appliances, poor insulation and low Building Energy Rating (BER). All contributors emphasized the linked, multidimensional nature of low incomes, high energy prices and building or heating inefficiency. Several referenced SILC; more recent Economic and Social Research Institute (ESRI) reports which indicated alarming recent energy poverty levels as high as 43%; and other research which identified those groups most at risk, which were now well known. Although energy was less of a problem in the summer months, its financial consequences were a year-round phenomenon, such as fuel-related debt.

The health consequences are now relatively well documented: circulatory and respiratory diseases and mental stress from inability to pay bills. Children and those already sick are especially vulnerable. Policies did not sufficiently recognise how fuel poverty is exacerbated by our climate, which is not especially cold but is damp. A cost-benefit analysis would show that investment in energy efficiency would lead to reduced ill-health and consequential burdens on the health service.

Looking at those groups most affected, those most vulnerable are the bottom 20% of the income distribution, about 352,000 households, even more vulnerable since the war started. Those groups most vulnerable to fuel poverty are well known at this stage:

- Tenants in private rented housing;
- People living in rural areas;
- Older people, especially those living alone;
- Lone parent households; and
- People with disabilities.

Voluntary organizations were familiar with the reports of the ESRI on how energy poverty adversely affected such households. The Vincentian Partnership for Social Justice Minimum Essential Standard of Living (MESL) figures showed a disproportionate increase in fuel costs in rural households dependant on oil, 115% in a year. In rural areas, there is still a high dependence on solid fuel, including 100,000 mainly dependant on turf, whilst gas connection was not an option. A substantial part of the rural problem was post-1970 "bungalow bliss" homes built without insulation or any thermal protection features. People with disabilities were already in fuel poverty before the current crisis broke, for example those homebound or requiring additional equipment. They were already likely to need heat and electricity more than other households. Although 50% of those on disability allowance received the Fuel Allowance, half do not. Furthermore, institutional providers in disability services now had to meet additional energy and heating costs this year without an increase in funds to do so. Although these most vulnerable groups were now well known, there is still scope for more sophisticated instruments to gauge the differential impact on the lowest, most affected deciles.

There is a question mark over the continuing validity of the conventional measurements for fuel poverty (more than 10% of income spent on fuel) now that some figures are now over 40%. There is scope for a more sophisticated measurement that takes account of actual house condition and the status of the owner (for example, an owner may be in s ome position to address the situation, a renter is not). Many people in real fuel poverty are above the social welfare qualification level. Energy poverty is also about "being stuck" in poorly insulated homes; not having choices or the resources to rectify the situation is also a definition of "poverty".

Policy analysis

Those consulted were highly engaged in policy analysis, attempting to come to close quarters with the obstacles and blocks to more effective responses. Their general views were that government action on fuel poverty was too little, too late, lacking in scale and ambition. The very fact that the last energy poverty strategy had run out in 2019 and was awaiting renewal three years later was indicative of a lack of sense of urgency. Many individual measures (for example, double social welfare payments, extensions of Fuel Allowance) were welcome but in their totality an insufficient response. The government was right to take balanced measures on both the 'social inclusion' side and the 'energy' side of the problem. The enduring challenge was – and always would be – to get the right mix of income support, renovation and consumer protection. Government is trying to reconcile conflicting aims, which is not easy. The policy response is explored under the headings of scale and ambition; retrofit programmes; and the welfare rate.

Scale and ambition of government policy

Government was seen to struggle with delivering a comprehensive, effective strategy. Decisions were described as short-term, siloed and market-focused. Had a national financial inclusion strategy been in place by now, some of the current problems could have been avoided, but it had been impossible to interest government in the idea "when times were good". EU directives were transposed minimally, not maximally, for example the definition of 'vulnerable groups'. Governments found it too easy to be blown off course by exogenous events, like COVID. In general, government was cautious by nature (e.g. the slowness in scaling up retrofitting), afraid of making mistakes which could be politically costly, preferring small steps at a time ("taking big steps is difficult"), following an approach that is easier but delivers only marginal changes. Institutionally, government policy was "incredibly siloed", with issues passed on from one department to another out of reluctance to take responsibility. Some approaches

were counter-productive: for example, carbon tax was regarded as "just another tax" that didn't change behaviour, for the simple reason that people did not know how to adjust, even though they wanted to. At the same time, boilers were still being fitted to new homes, something which could be stopped straightway, sending an important signal.

Even getting action on small things was a challenge and "small things matter". An illustrative example was the widespread prohibition applied to apartment residents against drying their washing on their balconies, some landlords imposing fines and penalties on their tenants for doing so. This obliged tenants to buy and use energy-consuming drying machines, exactly the opposite of the behavioural changes exhorted. Balcony drying is a standard practice in Europe. Although asked to do so, ministers did not appear prepared to act on the issue, "valuing snobbery higher than acting on climate change". Landlord prerogatives appeared to be valued more than tenant health, reflecting a wider problem that the benefits of health gains from living in warmer, drier living conditions were unappreciated. Another example was obvious blockages in the planning system, for example where applicants to provide renewables have to follow two parallel systems (Bord Pleanála and the regulator), whose timelines are out of sync. Even getting reports published was a problem. For example, a report on the health impact and health costs of fuel poverty, *Warmth and Wellbeing,* had been completed some time ago, a joint enterprise of the departments of the Environment and Health with the Sustainable Energy Authority of Ireland (SEAI) and Health Service Executive (HSE), but was still awaiting publication.

If we looked at this country's performance on e nergy poverty in a European context, Ireland was middle range along with Britain and the accession countries; the northern Europeans performed better; southern Europe less well. Britain and Ireland had a unique problem insofar as the 'cold' season was not especially cold, but with our cool temperate maritime climate was damper and longer than northern Europe, so we had a longer heating season. There was criticism that Ireland learned too little from the rest of Europe. Other countries offered good examples, like Scotland, Finland and the Netherlands. We could interest ourselves in the European Council for an Energy Efficient Economy (ECEEE).[27]

Retrofit programmes

Both of the present retrofit programmes presented problems. The 'free upgrades' scheme, which is welcome, had met with such a take-up that there was now a waiting list of two to three years. The industry does not have the labour market capacity to meet this demand, a problem compounded by the housing crisis. This was a serious bottleneck and they were not hitting their targets. Questions were raised as to whether state agencies in the training area (e.g. Solas), as well as the department itself (DETE) were sufficiently pro-active in addressing and resolving the issue. The retraining of Bord na Móna workers was an example of an opportunity to re-skill workers around renovation and retrofits. The waiting list for the free upgrades had to be put into context:, they were worth an average €18,000, which was the equivalent to a small house extension, for which you would have to wait for a builder for some time anyway, but this was still avoidably too long. The third level institutions were working on this and there were hopes that the waiting time should begin to improve in about a year's time. Although the skills shortage was Europe-wide, Ireland had the advantage of an expanding economy, so that we would have relatively more resources available than other states.

The general scheme, essentially for owner-occupied homes, had a built-in poverty trap for those on low incomes but ineligible for the free upgrades. For this cash-poor group, there was no prospect that it would have sufficient resources to match the SEAI grant. This trap was especially evident in some local authority estates, where tenants who had bought out their homes were not eligible for the free upgrades, but their next-door neighbours, who remained renters, were, although their energy situations were identical. This low *disposable* income of many middle-class families was an understated part of the problem. With existing financial commitments, they

were reluctant take on fresh debt to borrow for an upfront payment for a SEAI-aided retrofit. A typical full retrofit cost €23,000, a huge commitment. Going green was expensive: some people could afford one or two elements of the package, but not all. Here, de-risked low-cost loans could make a significant difference. In the future, there should be loans backed by the European Investment Bank, underpinned by legislation which would provide certainty. Another trap was the 50% grant to Approved Housing Bodies (AHBs), but their residents were by definition people from the housing list because they had such low incomes. Overall, granted our multiple household types and situations, as well as the bulk of housing with low thermal standards, the finance of retrofitting required more sophisticated design.

A significant policy dilemma in retrofitting is whether to focus on deep retrofitting or more modest improvements. The more recent SEAI requirements that push for deep retrofit for A2 or A3 BER standards, compared to the earlier preference for more minor and less expensive energy upgrades, such as attic insulation, cavity wall filling and external insulation giving increased insulation to perhaps C or B3 BER standard. With so many dwellings with F and G BER ratings, there is an argument to favour the worst insulation and energy systems which are arguably more of a priority from a fuel poverty point of view to at least bring them to D level. An insistence on entirely electric heating systems such as heat pumps, while theoretically the best option from a solely climate change perspective, ignores the reality that many people will still want to continue to have at least some option for solid fuels, even as a back-up in the event of disruption in supply, in addition to the correct bias towards movement away from oil or back boilers to more efficient gas-fuelled condensing boilers. From the financial point of view, an insistence on, in the owner-occupied section, the full 'bells and whistles' approach will most benefit those who can afford the more expensive upgrades, not those in the most fuel poverty. The preference of SEAI for all-up, deep-retrofits may have its own logic, but may not be the most practical approach.

The low basic welfare rate

For those groups concerned with social inclusion, the core weaknesses of government policy was the low basic social welfare rate: "at the heart of the fuel poverty problem is income inadequacy". This was a long-standing issue and did not emerge overnight. What was needed was a €20 increase in the basic rate and then moving it up to benchmark it against average earnings (27%). This would provide the certainty that would better enable people on low incomes to manage their energy bills. Even as retrofitting progressed, people still needed sufficient incomes to pay for their energy. The energy credits in Budget 2023 were not targeted, everyone benefitted, a political decision whereby government spread help to the full range of its supporters, including more affluent households who could still afford higher energy costs. There was an argument that government, while increasing the basic rate for many reasons including fuel poverty, should declare its ultimate intention to phase out Fuel Allowance as retrofitting progressed.

Interviews identified a number of critical issues deserving attention. In the language of public administration, these are sometimes called 'wicked' problems, those that are the most intractable and defy resolution. Their visibility may be low, but their importance may be just as salient. They are the private rented sector, electricity prices, regulatory protection, digitization and community energy providers.

Private rented sector

The private rented sector is a weak point in government policy, for several reasons:

- Energy standards there are among the worst, especially older buildings. They have lower BERs, are harder and more expensive to heat, uncomfortable as a result with physical and mental health implications and unwelcoming to visiting friends and family;

- The 'split incentive', combined with weak tenant protection, means that tenants have no reason

to invest in upgrades if they can then be evicted at short notice, while landlords are reluctant to invest in improvements that they might not be able to recoup in rental. There are many foreign nationals in private rented housing, including a transient population which by definition is uninterested in retrofitting. Some conditions are so bad and overcrowded that they could be called "new slums", so that fuel poverty is hardly a priority for landlord or resident. Their extent is under-estimated, because of the lack of local authority inspections;

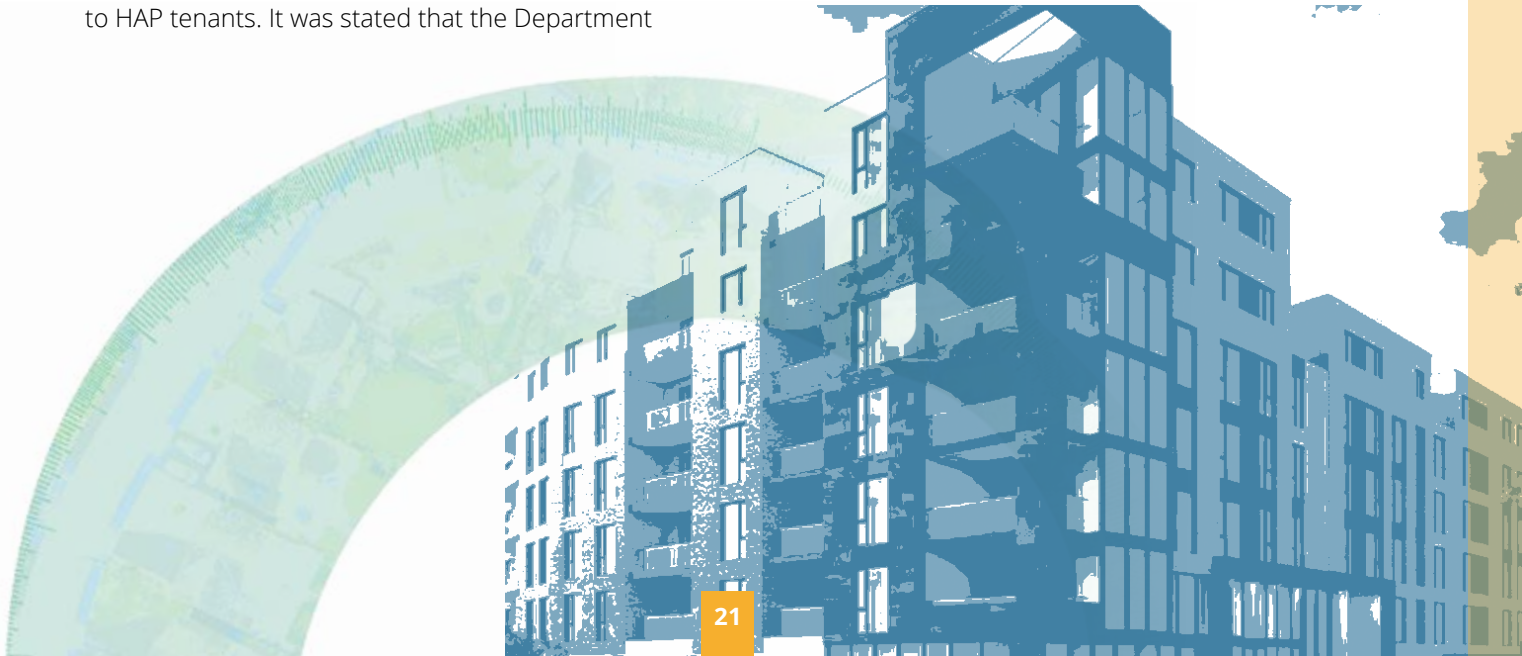
- Fuel Allowance is limited to one payment per building, even though several tenant households may be present;

- Granted the general lack of government interest in policing the sector, supervising a grants programme there would be an additional challenge.

Existing strategies set no targets to improve the private rented sector and no additional incentives for improvements therein. The *Strategy to Combat Energy Poverty* set down two specific actions for the private rented sector: a review consultation and a pilot scheme to open energy efficiency supports to Housing Assistance Payment (HAP) tenants. In the event, the outcome of the consultation was never published and the pilot scheme never started.

During the consultation, the government cited the long-standing Repair and Lease Scheme as an example of its response, but it is not available to HAP tenants. It was stated that the Department of Housing, Planning and Local Government would set down minimum BER for the private rented sector – but this has not been done. SEAI schemes were cited as a response – but these are the standard SEAI schemes for *all* home owners, with no particular incentives or tailored schemes for landlords. Although this was not admitted, the government's reluctance to act was probably governed by fear of more landlords leaving the sector. Positively, the government recently announced a planned €10,000 loan tax incentive, which should make a start on the problem, but it remains a critical issue. Ultimately, a combination of carrot-and-stick policies was needed here.

The reform of the planning regulations in 2018 led to novel, severe, negative consequences for fuel poverty where one might not necessarily expect to find it.[28] These lowered building standards such as the proportion of dual-aspect apartments, reduced ventilation and permitted formerly-prohibited north-facing single-aspect dwellings, where residents will never see the Sun and for whom solar panels would be valueless.[29]
The preference for apartments over higher density housing types reduced incentives for solar panels compared to 'own door' homes. There is the danger that fresh planning proposals will limit the scope for judicial review, in this case on an environmental basis, such review being a practical, legitimate route for NGOs to ensure that there is compliance with environmental law.[30]



Electricity prices

Running through government policy is a message that energy use should be reduced, especially at household level, for example evident in the "shorter showers" controversy this spring. A contrary argument is that – whereas oil and gas use should indeed be speedily reduced – in the medium to long term the price of electricity should fall, be more affordable and this would automatically reduce fuel poverty. This can be done both by generating more through renewables and reducing their price. The first challenge is to undo the current anti-competitive European system whereby the price of renewable electricity is tied to oil and gas, even through the price of producing renewable electricity is about a third thereof. Whereas the original setting of renewable prices was successful in incentivising entry to the industry, it has now proved to be a serious problem and causative factor in energy poverty. Decoupling renewable electricity costs from oil and gas is now on the European agenda, but unwinding the liberalised European energy market would involve legislation and take some time. Cheaper, renewable electricity must be a policy objective.

A second challenge is, while reducing their cost, to increase the generation of renewables by the development of medium generation in the 500kW to 5MW range; small-scale generation in the 50kW to 500kW range; micro-generation below 50kW; and district or community heating systems, whose plants should be charged domestic, not commercial rates. The scope for mini and micro-generation was under-estimated and unconvincing reasons presented for holding them up, such as "direct line" issues which they have addressed more successfully in Belfast. By 2030, 70% of European energy should be renewables, circulated throughout the Union by inter-connectors.

Financial resources were available from areas where energy-related taxation did not apply. There was agreement on taxing aviation, but disagreement as to the legal options available under EU law (e.g. VAT). Aviation fuel is exempt from excise tax, unless one member state agrees with another to waive the exemption bilaterally, but there was no progress on this and Ireland had proposed no such arrangements. The ESRI has sketched the possible implications of aviation tax, so they are now known.[31] If general aviation cannot be taxed, there is still scope for taxing luxury aviation. Ireland has over 6,000 movements of luxury jets a year, which could bring in a significant yield and France had proposed such a tax. The government had cited unconvincing reasons for not doing so, such as the need for more data.[32]

The current system for billing electricity is a significant contributor to fuel poverty. The principal element of many electricity bills is the standing charge, which utilities are free to raise apparently without little control. Even if customers reduce actual electricity usage units to almost nil, they still face soaring and unaffordable electricity bills from standing charge units, which is counter-productive and inequitable. The elimination of the standing charge, with a higher priced usage charge, would create a direct relationship between cost and usage, unlike the present system which is functionally perverse.

Regulatory protection

The operation of the regulator (Commission for the Regulation of Utilities/CRU) is considered a significant problem area. Trust of suppliers is low among those affected by energy poverty. The regulator is perceived to support and be protective of the industry, more so than Ofgen in Britain. Consumer groups encounter the reaction to their proposals of "if we move too hard against the utilities, suppliers will leave the market". Although the CRU is enjoined to maintain a competitive environment, this is considered to be at the consumer's expense.

There were key challenges to be tackled by the regulator: self-disconnection; pay-as-you-go metering; the impossibility of switching without direct debits, which many people on low incomes felt disempowered them from being able to manage their money; and the definition of 'vulnerability'. There was criticism of the regulator for permitting

tariffs that charged more for pay-as-you-go; for permitting "walking up" prices for loyal customers; and for making it difficult to switch providers (although this of itself was not a solution).

What was poorly understood in the current crisis was the 'poverty premium': for example, people who pay for their fuel in cash incur a 50c charge per transaction; people who cannot get lower-cost accounts because of previous debt; people who struggle to establish their identity in the eyes of utilities; and the complexities and time-wasting nature of payment patterns between social welfare offices, banks, post offices and utilities. From this autumn, there had been a move by people away from automated payment to cash, because that way they feel more in control, but they are penalised for doing so. People with arrears who put a new €20 in the meter find that there is an automatic €6 cash deduction, so it is worth only €14. Although government advice is to shop around suppliers to get lower costs, in reality lower costs only benefit new customers for a limited period. For pre-pay, though, there are only three suppliers, so the range of choice is limited. For the main suppliers, there are 37 different schemes to try to understand. Switching is realistic only for people in a stable financial situation, but people in debt cannot switch, because their names are on a bad credit register. There is resentment that utilities should be making such huge profits which could go to a hardship fund. Without the €800 energy credits, many more would be forced into debt – but perversely, that might force utilities to reduce their prices.

The level of self-disconnection is greatly under-estimated. No self-disconnection figures are available and suppliers will not make them available, giving unconvincing reasons. Smart meters should make more data available. Advice services report many incidents of people self-disconnecting on a Tuesday to await a social welfare payment on Thursday for reconnection – but then there is a reconnection fee, another poverty premium. For consumer groups to raise the issue of self-disconnection with utilities is to prompt a reaction of denial and silence, suggesting that it is a real but unspoken problem.

Whilst this is an issue that goes beyond the CRU, the definition of a 'vulnerable' category remains a running sore, in practice limited to serious medical need (e.g. people dependant on a machine) and it seems impossible to establish a category of 'financial' vulnerability. Ireland has followed a minimalist interpretation of EU rules and definitions. By contrast, financial institutions several years ago agreed a code of conduct on mortgage arrears.

Positively, the stakeholder forum with the regulator is well regarded, the regulator appears to treat it seriously, sends its senior officials to attend and it has addressed a number of practical issues. The forum meets quarterly, comprising about 20 state and NGO actors (e.g. MABS, National Adult Literacy Agency, National Traveller MABS, Age Action).

Digitization

Digitization presents an unwelcome complication to the energy poverty problem, one accelerated by COVID. Many of those at risk with fuel poverty are not digitally highly literate and for example struggle with the online world, even email. As a result they are disempowered from dealing with utilities, never mind renovation or retrofitting. Many agencies and utilities now follow the principle of 'responsibilisation' – it is the responsibility of customers to respond to their way of doing business, not the other way around. The "onward march" of "online only" digitization "took no prisoners" and made less and less effort to adapt to people for whom it presented difficulty. SEAI, for example, is only prepared to deal with people on an online basis. There are fewer walk-in banks now, especially in rural Ireland. Utilities forget that when clients of services discuss their financial situation, they automatically take out pen-and-paper, not their computers. Finance is one of the things in life with which people struggle most, little wonder granted the lack of teaching in financial competence in schools. "No-compromise digitization" is a real problem.

Community energy advisors

Several voluntary organizations – notably the Society of St Vincent de Paul – have advocated the idea of community energy advisors to provide community and one-to-one, on-the-ground advice on energy efficiency, for example the schemes available, signposting to appropriate agencies, how to get the best tariffs and how to deal with application forms. Such advisors would help better pinpoint those in most need, assist people who "just did not know where to start" and be of much benefit to SEAI. They could address the worries that come with insulation, like the dislocation which would most concern older people. These advisors could be employed, funded and responsible to a combination of the SEAI, local authorities and voluntary organizations. Although nobody has argued against the idea, which has worked well in Britain, it has never gained traction, another "unspoken issue", yet advocates considered it not just desirable, but essential, in combatting fuel poverty. The instinctive reaction of many households to soaring energy bills was to "turn everything off", but advisers could be essential in steering people to positive solutions. A real weakness in government policy and practice is its reluctance to discuss the benefits of energy conservation at a practical, local level. It is a relatively low-cost, low-tech approach possibly disliked as inconsistent with digitization. People are expected to find energy advice themselves, and SEAI mentors work online. Government appears to underestimate the difficulty of ordinary people in understanding the benefits of retrofitting. Potential candidates for retrofitting are instinctively well disposed to the idea, but unsure as to the precise likely benefits. They find economistic 'payback' arguments overstated, weak and unconvincing, suggesting that other approaches might have more merit. Documentation was complex, even for well-educated, middle-class households. Apparently, SEAI would go to community groups on request, but this was not well known. Why not a pop-up café? A demonstration project for people to visit? Would the government consider free BER assessment, with practical advice to residents on where to start? As for local authorities, they do not appear to be committed to community engagement. Their area officers might do occasional workshops, but taking time to go out "into the community" was seen as potentially time-wasting.

Issues of governance and consultation

From the perspective of state-related interviewees, there is a view that the state (e.g. government departments) is culturally open to collaboration with non-state actors such as NGOs, which are welcome for their contribution. NGOs provide useful, valuable ground truth because they work with people in the most need. They bring the 'energy' and 'social inclusion' sides together and "join the dots" of the analysis and the solutions – here, statements by voluntary organizations acting together are especially valuable. There is a well-established system of consultation between the NGO community and government departments, more so on the social protection side than energy. NGOs do get to meet ministers, with officials sitting in on their discussions. Those most mentioned are the Society of St Vincent de Paul, ALONE and Age Action. NGOs have a presence on the little-known Planning Advisory Council (e.g. Community and Voluntary Pillar, An Taisce, Environmental Pillar). Stakeholder forums are considered to work reasonably well (e.g. CRU, Social Inclusion Forum), but there is scope for more. Governments know they cannot do everything the NGOs want and they understand this. NGOs are welcomed for highlighting government schemes and encouraging people to use them.

The NGO perspective is more nuanced and critical. First, it is recognised that this is a positive time for state-NGO engagement, "because there was a general agreement of there being a crisis now". The concern is that this would lead to crisis solutions – in the long term, policy development is better served by decisions taken in a calmer environment. The problem then is that when there is not a crisis, the institutions of the state do not then engage. There is criticism that "we are only heard during a crisis, not when times are good". There is concern that NGOs may then be expected to revert to a service role, operating grants or carrying out schemes, but not presenting views.

One analysis attributed the present crisis to the long-term legacy of the lack of public investment in the quality of housing stock and its thermal quality, our own slow progress on renewables, the lack of indigenous renewables that has left us vulnerable to external energy shocks, with the solutions in the form of direct payments and bill subsidies being "quickest

and easiest", but short term. NGOs have been knowledgeable about and advocates on fuel poverty issues for many years, so were able to respond to the crisis speedily. The government was still playing "catch up" on renewables and retrofitting, inclined toward tax breaks or band improvements for the more affluent while insufficiently targeting the bottom of the distribution to help it cope with fuel poverty. NGOs had proposed the range of measures required, from the short-term (e.g. income support) to the long term (e.g. retrofitting) and those policies to be avoided (e.g. continued fossil fuel subsidies).

The Irish NGO sector struggles to engage with the institutions at the highest level of government. NGOs consider themselves under-capacity and greatly overstretched in attempting advocacy work at national level, reflected in official impressions ("we don't see very many of them"). There is limited policy-making capacity, especially on the environmental side. Constellations of NGOs work on fuel poverty, some generously give their time to them so that they can pool resources, but resources inhibit their reaching their full potential. There is awareness of and sensitivity toward the gap between the 'social inclusion' and 'environmental' side of the fuel poverty issue.

The 'social inclusion side' of the fuel poverty lobby is considered to be well organized (e.g. Jesuit Centre for Faith and Justice, Social Justice Ireland, Society of St Vincent de Paul), professional and leading, but the 'environmental side' much less so, Friends of the Earth being about the only one, the others being much more involved in biodiversity issues. There are good technical agencies on the environmental side, e.g. the Green Building Council, but they are not NGOs in that sense. One suggestion was a joint fuel poverty project that united the social inclusion NGOs on the one hand, with FoE and the environmental technical agencies on the other.

NGOs do not feel that they are without influence, the recent double payment being a case in point which they managed to get "over the line", but "endorsement by the ESRI probably helped". Still, they are much stronger in Germany and Austria, reinforced by strong local authorities which are also district heating scheme suppliers with knowledge and experience in delivering efficient energy to low-income households. Where they all fell short was that other forces in play were much stronger, such as government ideological ensorcellment with "the market" in housing policy and the strength of the construction industry, which fended off environmental standards as threatening to their unit costs and profits.

The funding going into environmental NGOs was far too low, be that from government or foundations. In an area where the mastery of "granular detail" mattered, their capacity was too little and they needed assistance in opening up new places for dialogue, debate and getting traction on these issues.

Few are familiar with or had views on governance arrangements at national level, but for those who are, the existing consultative structures – from the Social Inclusion Forum at national level to the PPNs at local level – are not enough. There are forums where NGOs interact with government like the Social Inclusion Forum, the Roadmap for Social Inclusion, the National Economic Dialogue, the Civic Forum, the Disability Consultative Forum, while there are other channels of communication to government like via the Community Platform and the Community and Voluntary Pillar. The National Economic and Social Council (NESC) should be much more than a think tank for research, but a place for deliberation on such issues as fuel poverty. These are all opportunities to raise fuel poverty, but there were structural weaknesses:

- They meet too infrequently;
- In some cases, their work is determined and limited by a steering group, whose membership and modus operandi is poorly known;
- Several of these fora are siloed within their own departments (e.g. Social Protection), making cross-departmental actions difficult when it is a whole-of-government issue;
- The processes whereby some NGOs obtain representation on some of them are obscure;
- In some cases, NGOs are absent, e.g. the research and technical forum, the Fuel Poverty Network, as are important professions (e.g. architects, especially city architects).

In recent times, the Labour Employer Economic Forum (LEEF) has become a more significant institutional player, giving ICTU and IBEC preferential access to government against the wider social partners (community sector, farming and environment). It seems more than likely that tax issues, which have a formative influence of fuel poverty issues, will have been discussed there. This is not a positive development. There is also a need for social dialogue structures at local, regional and national level to address energy poverty and it is important to get structures in place now. Government underestimates the value of institutional structures (e.g. abolition of the Building Regulation Advisory Council).

One assessment, confirmed by independent research,[33] is that the Department of Housing, Planning and Local Government is so captured by the property industry that the influence of environmental or social NGOs concerned with fuel poverty is always uphill. The 2018 building standards were written by the industry itself, without NGO consultation, its views ignored in the subsequent consultation. NGO opposition to the cheese factory in Kilkenny, a test case, even a *cause célébre* for environmental NGOs, generated a ferocious blowback within the farming community, government and the department to the point that NGO perspectives were even more unwelcome. It contributed to current proposals under the Planning and Development and Foreshore (Amendment) Bill 2022, to replace the system of nomination to An Bord Pleanála through panels, which currently includes NGOs, by ministerial appointment. These provisions were criticized at the Oireachtas Committee on Housing on 9th November by the Irish Environmental Network as a return to the pre-1976 system and by the Irish Planning Institute for not including Bord competence in ecology, the built heritage and climate change.

2.2 Findings from published information

Supporting published information received as part of the interview process is grouped under a set of perspectives: NGOs; academic, technical and expert; services and policy. They combine a mixture of interpretation, commentary, analysis and proposals.

NGO perspectives

Starting with the wider context, the European Anti-Poverty Network (EAPN) brings together a wide set of perspectives at both European and Irish level. In Europe, EAPN reminds us of the importance of the European dimension of energy poverty, such as the European Green Deal, followed by the Just Transition Mechanism and the Social Climate Fund. EAPN Europe stresses the importance of the European Union re-asserting its control over the liberalised energy market; preventing low-income households from being locked into fossil fuels; and opportunities to develop green jobs for low-income households. EAPN Europe specifically recommends systems for consultation with low-income households, not just commercial companies; structured dialogue with civil society; empowering end-users in preference to private industry; and alternative energy models including community ownership. It warns of funding models like the Social Climate Fund that "implement short-term direct income support measures and fall short of long-term commitments to provide structural solutions, such as de-carbonising heating and cooling systems for people living in energy poverty."[34]

EAPN Ireland has proposed a moratorium on disconnections; windfall profits tax, to be used to protect low-income households in fuel poverty; a moratorium on data centres; and a Just Transition Commission.[35] In its proposals for the 2023 budget, EAPN Ireland is especially critical of the lack of application of the National Retrofitting Scheme to the private rented sector. It proposes increases in the duration and applicability of Fuel Allowance, targeted retrofitting, windfall taxes, deep retrofitting on a sliding scale and investment in public transport.[35]

*Environmental Justice in Ireland (*O'Neill et al) is also important in setting the broad background, which is the poorly developed framework for environmental justice in Irish law, policy-making and procedures.[37] In the field of energy poverty, it identifies particular problems in the Traveller community; the private rented sector (e.g. no minimum BER, lack of role for the National Retrofit Plan); taxation (the regressive effect of carbon taxes) and retrofitting (for limited eligibility and waiting periods). The previous energy poverty strategy lapsed in 2019 and was not immediately replaced, indicative of its low priority. They put forward specific proposals for improved data collection, accelerating the National Retrofit Plan and an obligation to consult people living in energy poverty.

Several NGOs offer important ground truth on energy poverty that sheds light on the application of government policy. CLM points to the lack of "voice" for people living in vulnerable and precarious housing, locked into fossil fuel dependence in poorly insulated homes.[38] CLM argues for the need for a rights-based approach and proper pro-active process of public consultation. Drawing attention to the health, morbidity and mortality consequences of smoky fuels, it proposes a ban on solid fuels, the prioritization of retrofitting toward low-income households, minimum standards in private rented accommodation and overcoming delays in existing retrofitting schemes.[39] In its budget recommendations, the centre warned that carbon tax was regressive, increased energy poverty and was distributionally unfair by being applied to households but not industry (e.g. aviation). It proposed no further increase in carbon taxation, a cap of electricity demands especially by data centres and increased investment in retrofit programmes.[40] In its commentary on clean air, the centre proposes a new national, cross-departmental energy strategy with elevated grants for older people for central heating systems, carbon tax ring-fenced for measures against fuel poverty and state-guaranteed minimum units.[41] In its commentary

on an energy strategy, Community Law and Mediation emphasizes the need for a whole-of-government approach, improved data collection, effective monitoring and evaluation, public participation, a rights-based approach and an Energy Poverty Act that would define fuel poverty, set down ministerial duties, introduce legally bound targets and set up an independent fuel poverty advisory council.[42]

The Peter McVerry Trust emphasizes the importance of re-purposing and retrofitting empty properties and vacant or derelict buildings for social housing, believing that its potential is greatly under-valued. This would make an important contribution to reduce emissions arising from new house construction, its associated infrastructure and greenfield development. Moreover, such conversion, along the lines of the Buy-and-Renew and the Repair-and-Lease scheme, of empty and vacant buildings for new social homes would be cheaper and regenerate often rundown brownfield areas or streets.[43]

Social Justice Ireland (SJI) documented the nature of fuel poverty, the impact of rising prices, the poor standards of thermal efficiency of low-income homes and their use of costly, carbon-emitting fuels. Existing subsidies are regressive because of their unaffordable up-front costs for those on low incomes. Investment in renovation for those who need it most is insufficient, while renewables policy does not provide opportunities for cooperatives, farmers or individuals to contribute to their own needs, nor the national grid. Carbon tax increases hit the poorest hardest and are not matched by increased income support, transport or state-led renovation. Social Justice Ireland proposes local Sustainable Development Councils (SDCs) to contribute to local and national social dialogue, policy design and planning.[44]

SJI prepared an extensive menu ahead of the 2023 budget.[45] Its theme was "ambition and investment required", diverting fossil fuel subsidies to renewable energy, a windfall tax on energy companies and more investment in renewables, with specific proposals for Fuel Allowance, reforming the national grid, an increased aggregate levy, deposit-and-return schemes, investment in the circular economy and the wider application of wellbeing indicators. In the event, the 2023 budget, while including some welcome measures, was a "missed opportunity", insufficient to address fuel poverty, failed to divert existing fossil fuel subsidies (e.g. aviation) to renewable energy and did not re-design the system of Fuel Allowance as recommended by the Organization for Economic Cooperation and Development (OECD).[46]

SJI's contribution to the energy poverty strategy review stresses the importance of tackling, together, energy inefficiency and income inadequacy.[47] It outlines those most at risk (lone parents, private rented tenants) and the principal challenges, especially the need to address the barriers to low-income homes to obtain grants (e.g. extension of *Warmer homes*), to provide additional support in rural areas and include Travellers. Its proposals focus on the need to redesign the Fuel Allowance (year-round, wider eligibility, delinked from fuel type) and remove €2.4bn fossil fuel subsidies (mainly aviation).

Its 2022 social justice review tackles some of the larger questions around sustainability.[48] Its overall view, at macro level, is that "a significant gap remains between climate action policy and climate action delivery", targets have been missed, required shifts in investment (e.g. to public transport) have not been made and a more urgent response is required. In the specific area of fuel poverty, there is insufficient investment in the infrastructure to support retrofitting and renovation, there is still such high a bar for low BER, low-income households to access energy schemes that their use is regressive. A comprehensive state-led scheme "of sufficient scale" is required, increasing capacity in the construction sector. SJI is one of the few organizations to address institutional issues, recommending the extension of social dialogue to involve all the stakeholders at national and local level to cover just transition, for example through Public Participation Networks and Sustainable Development Councils. SJI also addresses "policy coherence", recommending the integration of sustainability into economic policy, taxation, transport and industrial policy (e.g. data centres).

Another organization drawing attention to the private rented sector is **Threshold**.[49] The organisation outlined the concentration of fuel poverty in the sector; the government commitments (*Housing For All:* minimum BER in the private rented sector by 2025); the specific problems of the sector (e.g. large number of small landlords and their limited financial resources; complex arrangements governing apartments; lack of construction capacity; evacuation during renovation; split incentive) and presents 15 recommendations and solutions.

In its views on the issue, the **Irish National Organization of the Unemployed (INOU)** is critical of the lapsing of the 2019 strategy and demands an Energy Poverty Act that would:

- Ensure a whole-of-government, cross-departmental approach for a new strategy;
- Refine energy poverty beyond the current "10% of income" definition, which in its view inadequately reflects the situation of older people and people with disabilities, the time of year and energy prices; depressed energy use; and re-measure it by systems that are actionable and time-bound;
- Adopt a strategy through an inclusive consultation process involving anti-poverty, housing, community, social justice and human rights bodies to ensure that it is fully poverty and equality-proofed.[50]

Irish Rural Link (IRL) emphasizes how, in reducing or phasing out the burning of turf and other solid fuels, it is essential to facilitate low-income homes to adapt their heating systems, especially those living in stand-alone houses. Many households do not have the financial wherewithal to make the changes even with the grants available and IRL proposed a low-repayment loan scheme.[51] IRL raises the energy poverty crisis at the top of its most recent pre-budget submission, how it was most severely affecting rural areas, compounded by transport difficulties.[52] It proposed a 30% increase in welfare payments, 50% increase in the Fuel Allowance, lifting the 3.2km qualification limit on school transport and a target of 30,000 retrofits a year. There was a plea

Courtesy Friends of the Earth Europe

for community participation in decision-making on how to best develop renewable energy.[53]

The threat of energy poverty has been outlined in the disability field by **Rehab** and **Inclusion Ireland**.[54] The cost of living is the dominant issue for people with disabilities, with the cost of energy one of the foremost concerns, people struggling to pay for electricity, forcing a choice between "eating or heating". Decision-makers underestimate the costs for people with disabilities and the pressures of inflation.

ALONE highlighted the impact of fuel poverty on older people, who use up an increasing proportion of their income – already below the general poverty line – to face fuel poverty. They have already put on more clothes, are eating less and their proportion below the poverty line had increased. Older people risk going hungry and cold. ALONE's proposal is for targeted support for older people: a temporary means-tested basic food allowance at €25 per week; wide eligibility for the Fuel Allowance; and prioritising low-income families for retrofitting.[55] For the 2023 budget, ALONE proposed a €20 increase in the pension each year for two years, a €20 increase in the Living Alone Allowance; €20 in increase in the

Fuel Allowance and its seasonal extension from 28 to 35 weeks. There were significant increases in energy charges before 2022, it says, with carbon tax eroding the value of the Fuel Allowance. Older people comprise a significant part of excess winter deaths from fuel poverty. 70% of older people (aged 75 or older) live in homes in the BER D to G class, with 10% in G ratings. 40% of inflation was energy-related and government measures, whilst welcome, do not sufficiently address the hardship experienced.
A 2022 survey (N=123) found high levels of concern about the cost of living, 65% struggling to pay their bills, heating costs being top of their list, the reduction of energy costs being top of their wish list. The survey found widespread fear, anxiety, *food vs fuel* spending dilemmas, curtailed heating, inability to afford improvements, energy costs hard to control. Cold homes exacerbated respiratory and cardiovascular conditions, stroke risk, arthritis and flus.

ALONE presented a long list of measures which should be taken in the new energy poverty strategy around income support, allowances (linked to the Minimum Essential Standard of Living, MESL), renovation (e.g. Better Energy Warmer Homes Scheme, BEWH), retrofitting, tax adjustments (e.g. VAT), research (e.g. excess winter mortality), simplification of schemes (e.g. Housing Aid for Older People grant), addressing poverty traps (e.g. older people with an income above the Fuel Allowance, but insufficient resources for a loan), documentation (e.g. take up of Additional Needs Payments), targets, timescales and milestones.
It proposed institutional change in the form of a cross-departmental working group, to include representatives from the departments of Environment, Social Protection, Housing and Health (at a minimum) to complete actions recommended by the forthcoming strategy and an NGO presence on the Energy Poverty Advisory Group to represent the lived experience of those impacted by energy poverty. ALONE was critical of the lack of data on older people switching supplier; the lack of offline facilities to do so when many older people were not on the internet; low switching rates among older people (28%) and lack of hotline advice.
Older people should be put on the introductory rate. ALONE recommended the reintroduction of the discontinued oil stamps scheme. It recommended the European-pioneered training of frontline, NGO and community workers on energy poverty.
ALONE drew attention to the Energy Poverty Advisory Group (2021) which includes departments of the Environment and Climate Change, Social Protection, Health, the CRU, the SEAI and the Central Statistics Office (CSO), but not NGOs: this must be rectified.
ALONE was critical that the last energy poverty strategy promised annual implementation updates to be published and discussed at public workshops, but reporting was not carried out and public workshops did not take place.

The views of ten NGO as a whole were presented in July 2022.[56] They were signed by Age Action, Community Law and Mediation, Disability Federation of Ireland, Friends of the Earth, European Anti-Poverty Network (EAPN) Ireland, Irish Rural Link, National Traveller MABS, Social Justice Ireland, TASC and Threshold. Their starting point is the figure of 29% of people living in energy poverty and the general proposition was that government must target support to those most affected by rising energy costs and prioritize low-income households in national retrofitting efforts. Their specific proposals were a ban on disconnections, a windfall tax, doubled

Fuel Allowance and wider eligibility, an increase in social welfare of €20 weekly, all customers to be on the lowest tariff, scaling up retrofitting and solar, increased insulation grants, a scheme for the private rented sector, residential standards for Traveller caravans and banning oil and gas boilers in new homes. Additionally, there should be specific measures to help Travellers, local community energy advisors and sliding grants for deep retrofits.

The Society of St Vincent de Paul published a *Submission on Energy Poverty Action Plan* drawing attention to the effects of energy poverty on children, principally health (e.g. asthma arising from damp conditions, mould and rot) concentrated in the private rented sector.[57] Single parent families were known to be at exceptionally high rates of utility arrears. The society was disappointed that the Warmth and Wellbeing pilot scheme was not continued, because it had led to reduced doctor visits and use of antibiotics. The society suggested a targeted scheme for those most at risk of ill-health, including people with disabilities. The society drew attention to the particular circumstances of Travellers, where the energy poverty level was 75% and whose housing conditions had already been condemned internationally. Caravan loans covered only – in effect – uninsulated trailers. Only one Fuel Allowance was available per bay, regardless of the number of families sharing therein. The society remarked on the narrow interpretation in Ireland of the 'vulnerable' category under the EU consumer protection law of 2009. Here, under 2011 regulations, 'vulnerable' is defined as "critically dependent on electrically powered equipment such as life protecting devices, assistive technologies to support independent living and medical equipment, or vulnerable to disconnection during winter months for reasons of advanced age or physical, sensory, intellectual, or mental health", but unlike other states does not include affordability nor socio-economic circumstances (the society is one of the small number of organizations to raise the issue). The society presented a series of recommendations to the regulator for the identification of and assistance to customers who are self-disconnecting; affordable repayment plans; the prevention of unwarranted disconnections; ensuring a meaningful 'vulnerable' register; setting down manageable repayment models; and for an advocacy service. The society concluded by proposing that the new energy poverty plan be put on a statutory footing; that there be an Energy Poverty Act with binding targets; that there be a coherent, systematic data strategy, which includes the Traveller community; and specific research by the CRU on self-rationing and self-disconnection so as to form the basis for improved consumer protection.

One trade union commentary is included, for convenience, under the NGO rubric. Liberalisation was challenged by the European Public Services Union (EPSU) as having led to higher prices and increased energy poverty, requiring a return to public ownership.[58] Ireland has one of the higher rates of energy poverty and arrears on utility bills.[59]

Technical, academic and expert perspectives

The Irish Green Building Council (IGBC) has built the most comprehensive set of publications. Especially helpfully for this research, it has addressed some of the key research questions, for example by presenting a critique to the *Roadmap to Renovation - Ireland's third long-term renovation strategy*.[60] The IGBC is positive about the government's Climate Action Plan for its clear governance structure and targets; increased funding for renovation; the SEAI's behaviour unit; the *Warm and wellbeing* scheme; and the new BER advisory report. Government policy must be a combination of "incentives, penalties, awareness raising and consumer behaviour change", underpinned by a "leave no one behind" approach. This proposes no less than 14 modifications to existing policies, the targeting of the worst sectors of the building stock (e.g. private rented), an attack on market failure (insufficient demand and supply), tackling developer-led urban sprawl, upskilling local authority retrofit capacity and a programme to address all public buildings. In particular:

- Public authorities must lead by example, for example the B2 standard for all social housing by 2030;

- Solution-focused public awareness plans, with renovation made convenient and accessible, transparent market information and the easy identification of professionals;

- Not only upskilling the renovation sector, but its professionalisation as a career for architects, engineers and construction, with strong quality assurance systems;

- Prevention of demolition before comparative calculation of environmental and carbon impacts;

- Financial instruments: a combination of grants, tax-breaks and low-interest loans.

The IGBC identified particular problems: retrofits were seen as complex and disruptive; customers knew little about them or their quality assurance; the industry was under-skilled; there was a lack of attractive financial models. The scale of the awareness challenge was comparable to that of the anti-smoking and anti-drink driving campaigns. There was a poor level of citizen engagement. There should be demonstration homes. An example of a useful tool was a Building Renovation Passport with record-of-work logbooks.

IGBC issued a commentary of the strategy to combat energy poverty.[61] It emphasized the targeting of low income households; the private rented sector lifted to Minimum Energy Performance Standards by 2025; social housing to be refitted to B2 level; and the use of district heating. It enunciated the principle of "energy renovation being always preferable to fuel allowances".

IGBC issued *Unlocking Ireland's Potential - Toward large scale deep energy renovation* (2017) which expressed the need for a framework with long-term certainty, to start now, making deep retrofitting desirable, upskilling, standard setting, quality data and collaborative engagement. IGBC's most recent manifesto is the comprehensive *Building a Zero-Carbon Ireland - Roadmap to decarbonise Ireland's built environment across its whole life cycle*, tackling the problem of building emissions, 37% of the total, both operating buildings but also their construction ("embodied carbon").[62] This is a critical document which opens with the statements that the present climate action plan will not deliver by 2030 a cut of 51% in emissions and that the *National Development Plan* (NDP) would "blow the carbon budget". The title *Understanding the Scale of the Challenge* is indicative of its approach, emphasising the need to accelerate retrofitting, reprioritising the NDP, reducing new construction and increasing the renovation of old. It is one of the few to propose administrative change, for example an oversight department, citizen assembly, revising the regulatory framework and changes to planning law.

In its pre-budget submission for 2023, the IGBC argued for an inventory of disused and under-utilised property, retargeting housing subsidies away from new housing to renovation, improving technical advice for renovation and a rule that all new homes must henceforth be highly energy efficient, constructed with low carbon embodied materials and enable a low carbon lifestyle over their whole life cycle, making the construction industry and its materials low-carbon.[63]

Several years ago, the IGBC identified the private rental sector, commercial and residential, as an especially deserving focus for energy conservation.[64] It identified the key challenges such as especially low BERs, the powerlessness of tenants, low take-up of existing schemes by landlords, and lack of local authority enforcement of existing regulations. It proposed new minimum standards, technical support for landlords and tenants, and a multi-instrument financial model.

According to ENERGISE, domestic energy efficiency is impeded by limited uptake among lower income households due to lack of accessible information, ineligibility, or competing priorities. Evidence suggests that household-level face-to-face advice and support on improving energy efficiencies are needed and charities can operate effectively in this space. A 2021 study in North Dublin (N=128) found a high level of curtailment of energy use (e.g. appliances, reduced heating and showers), but with low perceived benefits therefrom; low participation in minor works (e.g. attic insulation); 25% on pre-pay meters; high obstacles to retrofitting

(e.g. cost); with the need for more appropriate, trustworthy information and advice, especially one-to-one.[65] Retrofitting faced a double trap. First, most households did not have the disposable income to pay their share to match the grant; second, even for those who qualified, finance alone was not enough.

Aoife M Foley (QUB) and colleagues believe that fuel poverty and transport poverty co-occur and reinforce one another, a double vulnerability especially in rural areas.[66] Despite a common energy market, they have never been assessed as a joint issue for this island. She and her colleagues criticised existing policies for their underestimation of the financial costs, knowledge and non-financial burdens for the uptake of new energy technologies; the over-reliance on market signals to trigger retrofitting; assumptions about the preparedness of people to enter debt for new technologies, which is low; and poor public transport, which leads to involuntary and expensive car use. Data and metrics on energy poverty, transport policy, their connections, intersectionality and consumer behaviour have multiple defects which may misinform policy.[67]

According to Kevin O'Rourke, fuel poverty in Ireland has distinctive features.[68] This includes climate features of damp, draught and condensation; particular problems of planning, design, building control, skills, workmanship and consumer information. Energy poverty requires coordinated responses across multiple fronts. Energy Action was especially valuable in being a community-based response to the diffuse nature of fuel poverty, which inspired other bottom-up approaches. The Warmer Homes Scheme was the first of a series of "stronger interventions", evaluation showing that it led to financial savings for households, health improvements and gains in comfort. Private rented was identified as a particular problem some time ago (2009), as was the skills base and the value of community-based organizations. A continued increase in energy prices was also assumed. Attention was drawn to the importance of protecting low-income consumers on pre-pay and in danger of disconnection. Now, action against fuel poverty requires a complex set of actions across multiple fronts: policy, market, data, planning, technical, instruments, finance, standards, systems, skills, and cost-benefit analysis.[69] Carbon tax, a contentious instrument, was anticipated to affect most adversely those dependent on solid fuel, people in rural Ireland and those on low incomes above the level to qualify for Fuel Allowance.[70]

Another earlier paper (from 2008) outlining fuel poverty was by Sue Scott and colleagues (ESRI).[71] This advocated a switch in intervention from income support, which should be seen as a temporary measure, to energy efficiency; identified the private rented sector as a problem area; drew attention to the many restraints on investment such as insufficient information, poor perception of gain, lack of access to credit, market failure and disruption; and suggested that health gains were underestimated.

Simone Arrigoni et al (Central Bank) have made an important recent contribution to our understanding of energy poverty and those households most at risk.[72] This found that 15% of households (N=180,000) were in precarious economic circumstances, with limited savings buffers and were spending up to 44% of their income of food and fuel, so that targeted supports were required. These households were younger, single, female-led, unemployed, disabled or working in the home, also likely to be dissavers, highly indebted or renting. Savings made during the pandemic period may already be exhausted. Savings levels were typically less than a week's income. Energy use, already reduced, offered limited elasticity because of its essential nature. They concluded that "combined with their available income and low level of savings, a further deterioration in resilience is expected if prices of essentials increase further. These already marginal households have limited financial means to meet additional price increases."

Finally, Marie Hyland (ESRI) described the liberalisation of the European electricity market as, among other things, politically and ideologically driven, leading arguably to increased costs.[73] Regulatory oversight was ever more important, even though it added to costs.

Service perspectives

MABS in Finglas/Cabra compiled a substantial body of information available on the relationship between debt and fuel poverty from early this century. As far back as 2006, it was found that 54% of new clients were fuel poor and that fuel costs were a significant contributor to indebtedness.[74] It became a prominent issue many years ago. Three particular concerns arose: energy affordability, disconnection policy and 'vulnerable' consumers. Disconnection practices and re-connection charges inflicted needless hardship. The definition of 'vulnerable' consumers was limited to those over 66, living alone or with other older people or minors, people on life support equipment and people with mobility, hearing and sight disabilities; and was not in any case properly applied.[75] In 2022, MABS reported that "the dramatic increase in baseline charges to home energy costs (electricity, gas and oil) had resulted in a surge in the number of clients presenting who could not afford to cover their monthly usage let alone contribute to an arrears balance. This resulted in difficulties for MABS advisors trying to put in place a sustainable payment plan between suppliers and MABS clients." By June 2022, MABS distributed €1.4m of a hardship fund to those faced with the highest threat of energy poverty. For 2023, MABS recommended that:

- Targeting of Fuel Allowance and similar benefits be extended to those in work but on low incomes (e.g. Working Family Payment, medical card);
- The electricity credit be extended to those on sub-meters (e.g. in flats), including Travellers;
- There be a new strategy for financial inclusion, the previous having been 2011.

Changes in banking in recent years (e.g. closure of banks, withdrawal of large providers, digitization) had exacerbated fuel poverty by making utility payments more difficult for those on low incomes.[76] It was the view of MABS that the consequences of digitization for fuel poverty were underestimated.[77] It examined the problems of those unbanked, due to involuntary account closures, branch closures, banking costs and issues of identification. Energy suppliers charged additional costs for cash payments; and, conversely, offered discounted rates for those paying by direct debits.

In its most recent contribution on rising energy prices, MABS proposed more manageable repayment plans over a more extended period; reduction of the 25% debt element of indebted top-ups; pre-payment meters to be set on the most favourable tariff; suppliers to find ways to identify self-disconnecting customers and devise systems to assist them; suppliers to provide escalation contacts to avoid or rectify disconnection; an extension of disconnection notice beyond three days; training in the call centres to identify and assist vulnerable customers; and suppliers to notify vulnerable customers of their eligibility for the vulnerability register.[78] MABS identified several serious problems in the treatment of customers, such as repayment plans that did not reflect repayment capacity and lack of systems of repayment that respected both current usage and arrears. Only 1.9% of gas customers were rated as 'vulnerable', an improbably low figure granted the customer profile.

In 2021, MABS presented the experience and proposals of the users of its service, a group where 72% were estimated to be in fuel poverty even before the current crisis.[79] This identified a range of problems in government policies and practices: not everyone qualified for free schemes and for those who did, two-thirds of funds were required upfront. Green loans were unsuited for those already indebted. People did not engage out of fear, lack of understandable information and competing pressures. Low income groups found themselves hit by carbon taxes, 90% unable to afford improvements, without access to credit, with no face-to-face advice or outreach.

In its recent *Submission to the 2022 Energy Strategy Review,* MABS wrote of the alarm with which it noticed household utility debt bringing many people to its doors, coming simply to find a way to pay their bills and cover everyday expenses, never mind to service debts.[80] Here, MABS put

forward 20 recommendations under the five invited headings of the review, covering upgrades (payments, loans, targeting, helpline, identification of candidate properties); private rented (meters, poverty premium, upgrades); consumer protection (standing charges, tariffs, caps, payment schedules); and governance (cross-departmental group including civil society, education). New consumer protection measures announced by CRU in August 2022 were welcomed.

Energy was a significant section of the Citizen Information Board 2023 budget proposals.[81] It identified lower income households, older people and rural households as those most affected by the crisis. It noted the high level of enquiries about Fuel Allowance, household benefits and upgrades, specifically about eligibility and the poverty traps arising.

Political perspectives

The principal opposition party is Sinn Féin, so its views are especially relevant as they may offer an alternative approach and outline the policy menu for a future government. In its just-published *Vision for Renewable Energy*, the party is critical of the "delayed ambition, chronic lack of implementation, inadequate planning and resourcing" in the transition to 80% electricity renewables by 2030 and the Irish government paying for renewables at the highest rate in the European Union.[82] A key point in the Sinn Féin analysis is that, at a time when rising energy prices are seen as unavoidable or even desirable, the transition to renewables offers a real opportunity to substantially *reduce* the price of electricity and called for a cross-departmental task force to achieve this. The party proposes reforms in the regressive peak-demand household-based Public Service Obligation (PSO) levy; the use of general taxation to invest in renewables; community ownership models; breaking the link between the renewables price and that of gas; ending the regressive distribution of network charges which favours large industrial consumers at the expense of households; and ending the regressive nature of standing charges, which requires legislative authority for the CRU to undo. The party is critical of the failures to develop renewables at the scale and pace required; our dependence on energy imports; the under-development of additional sources of renewables (e.g. wave, bio-methane); the risks of data centres; and the "slow and adversarial" planning system.

The party proposes a planning and environmental court and the increased funding of NGOs such as the Irish Environmental Network. It proposes state-driven investment in ports to support the offshore renewables industry and technological innovation in renewables. Sinn Féin is highly critical of the policy of energy liberalisation, privatization and the sell-off of state assets, with our electricity prices rising from the lowest to the highest. While the clock cannot be turned back, the party favours a rebuilding of public ownership, 10% community ownership by 2030; and scaling up domestic solar energy by tiered grants to assist low-income households.

Sinn Féin has published a series of documents.[83] *Living in Energy Poverty,* was a survey (N=300) pre-dating the current crisis which found that two-thirds struggled to heat their home; some groups were especially at risk (renters, people with disabilities, those on low to average incomes); and significant proportions went without heat involuntarily, cut back (e.g. hot water) or forewent other items. Some went to extreme lengths to cover energy bills (e.g. loans, consideration of leaving college; or took extreme countermeasures, e.g. staying in bed). They reported stress, anxiety, fear, embarrassment, depression and despondency. In *A Fairer Retrofit Plan*, the party starts with the problematic of the free upgrades scheme (Better Energy Warmer Homes) having a 27-month, 9,000 backlog wait; while the general scheme (One Stop Shop or National Home Energy Upgrade Scheme) requires the householder to have 50% upfront capital. The overall approach therefore needs redirecting around those on lower and middle incomes, coupled with an area-based approach. This should be complemented by a dedicated retrofit scheme for solid fuel homes; the prioritization of local authority retrofits; the refurbishment of vacant properties; community-based programmes; and refocused investment in solar energy.

The party has identified, on numerous occasions, the setting at European level of renewables policy to gas prices as a significant cause of price hardship. The Minister for the Environment, Climate and Communications though reported the view that dismantling the market system "would fatally undermine investment, regulation and development of the solutions we need."[84]

In its pre-budget proposals, Sinn Féin advocated the spending of resources on a public housing programme fitted to high energy standards, free retrofitting for low-income families and part-funding for others, investment in electric and public transport and community-based renewables.[85] The technical work required for small-scale renewables had already been done, making a launch in 2023 possible.[86]

Policy

Sabrina Dekker (DCC) is one of the small number of contributors to have addressed issues of policy analysis and implementation.[87] She drew attention to the weakness of *ex ante* or *ex post* evaluation systems in Ireland. Her report is highly critical of the government for failing to tackle related transport issues. Community engagement on renewables is described as inadequate and often token. Irish performance on these issues is uneven and requires better governance structures. In *Designing and Implementing Policy for a Just Transition*, she was most critical of the issue of public participation in the context of transparency, accessibility and governance. Although there may be some consultation on a government proposal at an early stage, it must extend collaboratively across the whole policy cycle through monitoring and implementation.[88]

The Environmental Pillar raised some serious governance issues with the government. The pillar, welcoming the government commitment to "regular and open engagement with all sectors of society" and "new models of sectoral engagement", met with the first Taoiseach of the current government in May 2021 but reported on no further progress in the subsequent year. The pillar asked for a second meeting with the Taoiseach in May 2022 to discuss the cost of living and energy crisis, but this did not take place till after the 2023 budget was announced.[89]

Lennon and Waldron (QUB) made an examination of recent changes in the planning system arising from the intervention by Property Industry Ireland (PII), what they call a process of "utilitarian de-democratisation".[90] According to them, "a coalition of developers, real estate consultants and financial advisors … worked in cohort with state policymakers to capture the planning decision-making process", with standing of the "civic" deflated in conceptions of the collective good, leading to a fresh concentration of capital among a cohort of property developers. This has significant implications both for civic participation in the planning process and environmental outcomes. Woods and Murray wrote of how fresh legislation will enable new housing projects to circumvent environmental impact assessments, while the Consolidated Planning Bill will prevent non-material objections (i.e. from those not "materially" impacted).[91]

2.3 Conclusions from the Primary Research

It is evident, from the testimony supplied by interviews and written documentation, that fuel poverty has been part of the social inclusion and energy discourse since the 1980s, intensified by austerity (from 2008), COVID (from 2020) and the war in Ukraine (from 2022). Austerity and COVID left a significant legacy, even before the dramatic worsening of the situation in 2022, now evidenced both by statistical data and the *heat or eat* reports from frontline agencies.

There is uncontested agreement that issues of poverty, energy, housing, income, social inclusion and consumer protection are intimately linked. Fuel poverty has negative health outcomes. Those most vulnerable to fuel poverty are people living in private rented accommodation, people living in rural areas (including "bungalow bliss"), older people especially those living alone, lone parents and people with disabilities.

Although individual aspects of government policy are welcomed and supported, critics believe that it lacks scale and ambition, is excessively market-focused and overseen by siloed administrative systems. It is excessively cautious and government is unable to resolve not only the bigger issues like the private rented sector but even small-scale matters like balcony-drying and releasing overdue reports. A range of interviewees and organisations consider carbon tax to be counterproductive.

The big issues are the welfare rate, which is too low to enable the lowest two deciles to afford fuel; and serious problems with the two retrofitting schemes. The 'free scheme' has a two to three-year waiting list, a bottleneck of serious labour market and skills problem, whilst the part-funded SEAI scheme is impeded by the inability of these households to afford the high upfront costs. The welfare rate must rise €20 to improve the affordability of fuel, while a de-risked, low-cost loan scheme is recommended for households applying for the part-funded SEAI scheme. Policy in energy poverty must take account of those in work and the low disposable income of many owner households.

There are several specific, difficult issues requiring attention. These are:

- Private rented accommodation, including retrogressive provisions for new apartments;
- The need to reduce renewable electricity prices by decoupling them from oil and gas; increasing small-scale generation; and applying carbon tax to aviation;
- A set of issues around inadequate regulatory protection such as self-disconnection, 'vulnerability' and the 'poverty premium';
- The compounding of fuel poverty by over-hasty, inappropriate digitization;
- The failure to progress low-tech proposals such as community energy advisors.

Issues of governance are important. Although government is open to consultation and there is some good practice (e.g. stakeholder forums), decision-making is too short-term, important structures are insufficiently developed at multiple levels, some channels are unclear and the non-governmental sector has insufficient capacity to contribute at the level merited by the issue. The absence of NGOs from the Energy Poverty Advisory Group must be rectified.

Published information reinforced these points. There was a wide range of written contributions covering the context for current fuel poverty; those groups most affected; distinct aspects of energy poverty; and the on-the-ground experience. Between them, they bring us the perspectives of independent experts, generic and focused NGOs, technical agencies (attention is drawn to the IGBC contribution), state agencies (Central Bank), academics, ground truth services (e.g. MABS) and politics (Sinn Féin and the Green Party).

They bridge the 'social inclusion' and the 'energy' sides of the discussion. These publications range from broad contextual analysis to quite detailed, "deep dives" into specific situations, such as older people. Some have identified important issues that may be obscured in the wider discussions, such as the narrow application of the 'vulnerability' definition. Political contributions are noteworthy for setting a broad, European context, spanning taxation, the renewables market, energy generation and consumer protection. Specific, dedicated analyses of policy are small in number, but they probe and explain many of the shortcomings identified earlier.

Overall, the interviews and published documentation invite attention to be given not only to the traditional, mainstream discourse around fuel poverty, such as income support schemes and the improvement of retrofitting, but to areas to which less attention has been hitherto been given. This list includes such areas as:

- The European renewables market and the prospect of significant medium to long-term reductions in the price of renewable electricity;
- The need to reform regulation and the role of the regulator;
- The need to understand and act on the iniquitous 'poverty premium' and such hidden issues as self-disconnection.
- There is an imperative to replace the minimalist definition of 'vulnerability' with a maximalist one.
- Because of its perverse effects, there is a strong case for the abolition of the standing charge;
- The importance of digitization and the need, counter trend, to pause digitization;
- The on-the-ground experience of households most affected by the problem in its multiple dimensions;
- The problem of the insufficient scale, pace and ambition of government policy;
- The need to solve challenging issues such as private rented;
- The imperative of challenging the negative consequences of liberalisation;
- The balance of deep retrofitting and more limited improvements for those in more severe fuel poverty;
- Government unwillingness to solve "small things";
- The under-capacity of the NGO sector to contribute, coupled with an immature institutional architecture for consultation and departmental capture by industry. There is a need to increase analysis of the policy-making process.
- New funding must be found, be that from government or foundations, with a joint fuel poverty project from the "social inclusion NGO side" with FoE and the "environmental technical agencies";
- Changes in planning policies and practices in recent years. These have lowered environmental standards, with negative consequences for fuel poverty (e.g. single-aspect, north-facing apartments); propose the replacement of NGOs on Bord Pleanála with ministerial appointees; and propose limiting of judicial review (which is important for environmental concerns). These issues have a low visibility among the broad body of those concerned with fuel poverty, but their importance should not be underestimated.

SECTION 3

A Win-Win Approach to Energy Poverty and Emissions Reduction?

This section represents desk research that occurred separately from the fieldwork reported in Section 2. While it is beyond the scope of this report to engage in a detailed analysis, not least given gaps in available data, this section's analysis provides insights that add to and elaborate on some of the themes emerging from the interviews and review of publications presented in Section 2.

This section is structured under the following sub-headings:

- Climate justice and the just transition
- Residential carbon emissions
- Housing inadequacy
- Income inadequacy
- Energy poverty, energy deprivation and excess winter mortality
- Other interventions to reduce both emissions and energy poverty

3.1 Desk-based analysis and findings

The issues of energy poverty and climate action are unified at a high level by the concepts of climate justice and the just transition. However, there is a lack of agreement about what these terms mean in an Irish context, and some conceptions of climate justice do not align with social justice, and this lack of alignment can be seen in some government policies.

Climate justice and the just transition

> **"Climate justice links human rights and development to achieve a human-centred approach, safeguarding the rights of the most vulnerable people and sharing the burdens and benefits of climate change and its impacts equitably and fairly. Climate justice is informed by science, responds to science and acknowledges the need for equitable stewardship of the world's resources."**
>
> — Mary Robinson Foundation Climate Justice[92]

Climate justice is the moral basis for action on climate. There are two schools of thought: an *isolationist* approach focuses solely on the ethical issues posed by climate change in isolation from other issues such as poverty, migration or trade, whereas an *integrationist* approach addresses the ethical issues of climate change within a general theory of justice alongside other issues, including poverty.[94] This distinction goes to the heart of the question of whether government policy should prioritise reducing carbon emissions above all else or whether a balance should be struck between reducing emissions and addressing the needs of those most affected by climate policy, such as people on lower incomes or people with certain disabilities.

The rationale for *isolating* the issue of climate (greenhouse gas emissions) from other issues is a simplification of an already complex issue and avoidance of political or ideological disagreements about what constitutes justice in a more general sense.[95] There is also a fear that whenever human self-interest is evoked to motivate change, purely environmental policies become diluted; for example, preservation of biodiversity or ecosystems are often argued from a narrow anthropocentric perspective of how the loss of species may affect food supply or the development of new medicines, rather than recognition of any intrinsic value or rights held by the natural world.

The roots of *integrationist* climate justice go back to the 1970s, if not earlier, when the concept of environmental justice identified that environmental issues have a disproportionate impact on poorer and more marginalised communities, including minoritized communities in the United States.[96] In 2022, it is widely acknowledged that climate change has a disproportionate impact on lower income countries that emit far less greenhouse gas than high income countries.[97] Across the world, but particularly in lower income countries, climate change and environmental degradation have already led to a toll in lives and health through drought, pollution and other negative impacts. The WHO projects that climate change will cause an extra 250,000 deaths per year between 2030 and 2050.[98] In Ireland, climate justice is often linked with issues of development and foreign aid, but it is equally relevant to domestic policy where the preferred term is often the "just transition", discussed below.

The importance of this debate is not just theoretical. Empirical studies demonstrate that the effects of climate change are worsening poverty and economic inequality,[99] while at the same time economically optimal climate policies (*isolationist* policies) are shown to result in persistent inequality on a global scale.[100] Within countries, the effects of climate change also increase inequality,[101]

> **Just Transition is the term used to describe the transition to a climate-neutral economy while securing the future and livelihoods of workers and their communities. A Just Transition to a climate-neutral economy provides and guarantees better and decent jobs, social protection, more training opportunities and greater job security for all workers affected by global warming and climate change policies.**
>
> — European Foundation for Work and Living Conditions [93]

while studies of individual countries demonstrate that inequality fuels climate change.[102] The need to break this cycle provides support for an *integrationist* approach by policymakers to reduce economic inequality at the same time as reducing emissions.

The rhetorical commitment to a just transition is in effect a promise to take an *integrationist* approach to climate action to ensure it does not unfairly disadvantage anyone and, additionally, that it supports people and communities jeopardized by climate change. The term just transition is not widely understood and is often perceived as hollow jargon. There are tensions between narrow (labour market) versions of a just transition versus more expansive (social justice) versions aimed at supporting anyone who needs help to adjust to a low carbon economy. For example, the European Union's Just Transition Mechanism is explicitly labour market oriented, providing targeted investment to boost investment and to alleviate unemployment in areas – such as coal mining regions – most impacted by climate action.[103] There has also been misuse of the term to suggest that all polluting firms should be fully compensated for ceasing their activities, as opposed to keeping the focus on supporting those who do not otherwise have the capability to transition to a low carbon economy.

In terms of residential emissions, an *isolationist* approach would simply reduce direct fossil fuel use by all possible means, including banning open fires, gas cookers and fossil fuel boilers, or at least making their installation and use prohibitively expensive. A fully *integrationist*, just transition approach to residential emissions would guarantee that households have the capacity to meet their basic needs for heating and cooking, which can only be met through the consumption of energy.

Carbon tax

The example of carbon tax policy in Ireland illustrates the difference between the two approaches to climate justice. Carbon taxes are an economically efficient way of pricing out fossil fuels and making alternatives more competitive in the market, creating strong incentives for people to switch their energy supplier and ultimately to change how they heat their homes and transport themselves. A policy of imposing carbon taxes without any counterbalancing measures represents an *isolationist* approach to climate policy. However, carbon taxes are regressive, as those households with the lowest incomes pay a higher proportion of their income in carbon tax. Higher income households may be able to afford better-insulated homes and electric vehicles, whereas lower income households will remain trapped in poorly insulated homes and reliant on expensive fossil fuels. In the worst case, carbon taxation could push more people into energy deprivation. For this reason the state has recognised that measures are needed to counteract the negative effects of carbon taxes on lower income households and other households whose characteristics make them particularly vulnerable to energy deprivation. Carbon taxation can be progressive if the revenue is used to support the most disadvantaged households.[104] It is a growing feature of government policy that carbon tax revenue is being used to fund welfare and just transition actions.

To date, a fully *integrationist* approach to carbon tax has not been adopted in Ireland. There is no automatic connection between carbon tax revenue and measures to reduce energy deprivation. Instead, it depends on recurring decisions of the government to allocate carbon tax revenue towards welfare measures in the annual budget. There is no guarantee that all the regressive effects of carbon tax will be counteracted for those who have no capacity to reduce their use of fossil fuels. To make Ireland's carbon tax regime fully *integrationist*, legislation that directs carbon tax funds to protect lower income households would be needed to underpin the rhetorical commitment to a just transition.

A win-win approach?

In terms of achieving climate justice and a just transition, there are three criteria for judging whether government policy has successfully developed a "win-win" *integrationist* approach to energy poverty and emissions reduction. Policy can be deemed successful to the extent that all three negative outcomes are reduced:

a) Residential carbon emissions

b) Housing inadequacy

c) Income inadequacy

A potential fourth criteria for success (but not necessarily a win-win scenario) is whether all households can meet their needs for energy consumption. Those who are unable to meet their basic needs for energy consumption are said to be experiencing energy deprivation. If they can only meet their energy needs by expanding a large proportion of their income, they are in energy poverty, and thereby at risk of deprivation (going without) in other areas of basic needs. A household simply funded to consume more energy will increase emissions unless their energy system is based on electricity sourced from renewables. Hence, from the perspective of reducing emissions, income supplements are insufficient and must always be accompanied by a programme of investment to ensure households can afford better insulation and can make the transition away from fossil fuel dependency.

Energy poverty and energy deprivation – while having unique characteristics – are ultimately derived from households' housing and income status. When housing adequacy and income adequacy are achieved, energy poverty and energy deprivation are logically eliminated. Conversely, whenever a household has inadequate housing or inadequate income, the potential for energy poverty or energy deprivation is present. And public policy responses, such as energy-specific income supplements, will continue to be required until the underlying issues of housing and income inadequacy are addressed.

Successful policy depends on the development and use of a sound evidence base, understanding and managing the political context, and planning from the outset for how the policy will be delivered.[105] Getting the balance right between evidence, politics and delivery is what is described as a strategic triangle. The evidence describes the public value that is being sought and how it might be achieved, the political dimension or authorising environment means ensuring that actions have democratic legitimacy and support from both officials and the people affected, and delivery is based on putting in place the operational capacities required to achieve targets. [106]

The strategic triangle is a useful concept to explain the challenge facing anyone who proposes strong climate action in the absence of social justice. Such proposals may be based on compelling evidence, and they may be deliverable, but they will not be democratically acceptable unless they address the wider concerns and needs of the population. The evidence from the fieldwork suggests that policies to maximally reduce emissions do not (yet) meet widespread public acceptance, due to concerns about energy poverty and due to political opposition to aspects of climate action such as carbon tax. In the terminology introduced earlier, climate policy needs to *integrate* social justice if it is to be successful.

Residential carbon emissions

The government's approach to eliminating residential carbon emissions includes four approaches:

1. NZEB and ZEB standards
2. Carbon taxation
3. Retrofitting poorly insulated housing
4. Replacement of fossil fuel home heating systems

Firstly, strong regulation (stemming from the EU) requires new build housing to have a high level of thermal insulation. The evidence is that NZEB standards are transformative at delivering highly efficient homes, as 97% of homes built in 2015-19 and 99% built since 2020 are A-rated under the BER system.[107] The *Climate Action Plan 2023* seeks a ZEB standard from 2030 that is likely to further enhance energy efficiency of homes. Given the successful implementation of the NZEB standards, it seems likely that the ZEB standard could be similarly successful. However, new housing is already unaffordable for most aspiring homeowners and if the adoption of ZEB standards were to raise house prices significantly that could pose a barrier to their implementation.

Secondly, as discussed earlier, carbon taxes are a generic tool across the economy that use a persistently increasing price to incentivise individuals and organisations to move away from fossil fuels. *The Finance Act 2020* legislated for incremental annual increases in the rate of carbon tax up to €100 per tonne by 2030. The recent *Report of the Commission on Taxation and Welfare* supports the implementation of the planned schedule of carbon tax rises, but it cautions that the yield from fossil fuel taxation will decline and will need to be replaced with alternative revenue, such as road charges. The Commission calls for provisions that are effectively fossil fuel subsidies (such as reduced rates of excise duty or VAT) to be phased out, noting that Ireland had the second highest share of fossil fuel subsidies in the OECD in 2017. The Commission also recognises that carbon tax is regressive, and it supports using the revenue for a just transition and to support those most vulnerable to higher energy costs. [108]

Carbon tax is not easily understood as it is described as a charge per tonne of CO2 emissions. Public agencies refer inquiries to consumer advocacy groups for descriptions in terms that people can relate to, such as 12.5 cents per litre of petrol, €5.09 per bag of coal or €122 per 900-litre fill of home heating oil.[109] In some cases, other taxes are more significant than carbon; for example, VAT and excise duty add 80 cents per litre of petrol versus the 12.5 cents from carbon tax. But because carbon tax rises have substituted annual increases in excise duty, the focus of political opposition has shifted to carbon taxation.

There is no doubt that €5 extra for coal or €122 extra for home heating oil are very significant increases for low-income households. While these price increases have been compensated for by the one-off lump sums granted to Fuel Allowance recipients and wider eligibility for Fuel Allowance, this is not perceived or understood as a benefit of carbon tax revenue and significant numbers of low-income households do not receive these income supplements, meaning that carbon tax simply leaves them worse off.

The recent high level of price inflation affects the relative importance of carbon tax, excise duty and VAT. Carbon tax decreases as a proportion of the price of fossil fuels, as it is a fix charge linked to emissions, whereas excise duty and VAT grow in absolute terms as they are levied as a percentage of price. In response to rapidly rising prices, the government reduced the rates of excise duty and VAT on petrol, diesel, gas and electricity as a temporary measure.[110] Carbon tax remained unchanged, but Budget 2023 and the EPAP indicate that carbon tax revenues were made available to counteract energy poverty and to provide additional funding for measures such as retrofitting.

The overall picture is not clear. The Commission on Taxation and Welfare notes that carbon taxation does not yet reflect carbon emissions from different fuels, and its effects are distorted by varied rates of excise duty and VAT. As such, the aim of price signalling and incentives for behaviour change are diluted/distorted in Ireland's fossil fuel tax regime.

It also seems that carbon tax displaced the 'old reliable' of increasing excise duty in budgets, diluting the incentives created.

It is clear from the fieldwork conducted for this report that carbon tax is contentious. While favoured by some, carbon tax was criticised by a range of interviewees and organisations. Arguments included that carbon tax is regressive (hits the poorest hardest), unfair (because households pay but certain industries like aviation do not), increases energy poverty, affects more adversely those dependent on solid fuel (especially in rural areas), negatively affects those just above the eligibility threshold for Fuel Allowance, and erodes the value of Fuel Allowance. Further criticisms were that people did not know how to adjust even though they wanted to, there needed to be stronger ring-fencing of carbon tax revenues, increases in carbon tax were not matched by increased income support, transport or state-led renovation, and those on the lowest incomes could not afford retrofitting, cannot access credit and have no access to face-to-face advice. It seems clear that carbon tax policy has more than just a serious communications problem. Numerous NGOs described negative social outcomes that they associated with carbon tax, which reinforces the point made earlier that the implementation of carbon tax in Ireland does not yet fully ***integrate*** social justice.

The third approach to reduce residential carbon emissions is retrofitting. Large numbers of older residential buildings in Ireland are poorly insulated. It can be estimated that 1.3 million homes have a BER of C to G, including at least 388,000 dwellings with a BER of E, F or G. The targets in the *National Retrofit Plan* – repeated in the climate plan and EPAP – are ambitious, i.e. to retrofit 500,000 homes to a BER of B2 or a cost optimal equivalent by 2030. The plan allows that 120,000 retrofits will be achieved by 2025, which is unlikely, and it implies 380,000 retrofits between 2026 and 2030, which is highly implausible without far-reaching transformation of the construction sector.

The evidence against these targets being achieved is that in the five-year period 2016 to 2020, the SEAI provided 106,147 home energy upgrades, but most of these were light retrofits not the kind of deep retrofit that is required. Only 17,707 (17%) of these retrofits went to energy-poor homes. The EPAP shows that only 3,068 retrofits were completed by late 2022, and the decrease in scale can be attributed to the longer time required for deep retrofit as much as due to a slowdown during the COVID lockdowns. The climate plan states that what is required is almost fifty times the level of deep retrofits that were conducted in 2019, but there is no evidence that the capacity is being built in the SEAI or elsewhere to achieve that level of activity, and it is not obvious that construction materials and labour will be available. To date, the state has failed to invest in apprenticeships and training to build up sufficient labour market capacity for the scale of deep retrofits that are now urgently needed. There is a commitment in the climate plan for greater financial investment and there is activity i n the education sector on the necessary skills, but much more is needed to provide the pipeline of workers and materials, as well as administrative capacity, to get enough retrofitting done. In this context, the intermediate target of reducing residential emissions from 7 to 5 million tonnes by 2025 seems unlikely to be achieved.

Retrofitting local government housing stock is an opportunity to meet part of the targets, but this will require investing more in the Energy Efficiency Retrofit Programme and ring-fencing the recruitment of new engineers and other specialists to work primarily on this project until completion, thereby speeding up the retrofit of all remaining social housing stock.

The elephant in the room is that, even if met, national retrofitting targets will only retrofit 500,000 homes by 2030, leaving at least 700,000 homes with poor to moderate levels of insulation (BER of C to G). Not all poorly insulated homes are eligible for the SEAI's free scheme, so a significant proportion of housing stock in 2030 will still be poorly insulated (E to G rated), while the cost of home heating based on fossil fuels will continue to ratchet up, year on year.


Courtesy Friends of the Earth Europe

The fourth policy approach is to encourage or subsidise the removal of fossil fuel home heating systems, from open fires through to gas and oil boilers. Heating systems based solely on electricity can be based on renewable sources of electricity (wind, solar) and electric heat pumps can enhance fuel efficiency in homes through transferring heat from the ground or air into homes. Government plans seek to install 680,000 renewable energy heat sources in new and existing homes, of which 400,000 will be heat pumps.

At least half of this target is likely to be met through the construction of new buildings, however the retrofit of renewable energy systems into older homes has been slow and even the SEAI's research shows that heat pumps are not suitable for all types of housing nor are they easy to use for some consumers.[111] The option of district heating systems has been under-examined, and it is argued that the energy needs of most homes in cities like Dublin would be better provided through district heating solutions rather than heat pumps.[112]

While more remote rural areas fear electricity loss after adverse weather events, most homes in these areas are still heated through fossil fuels, including chimneys for solid fuel use when electricity is cut. Overall, Ireland's housing stock remains highly dependent on fossil fuels (40% oil, 34% gas, 5% peat and 12% 'other', with less than 9% electric, according to Census 2016).[113] If rural housing is to be supported to adopt all-electric heating, there may be solutions to be found in some combination of heat pumps, battery technology, solar panels and/or portable generators to allow rural homes to rely on all-electric heating systems, but there is not yet a robust package of measures in place to guarantee home heating during failures of the electricity grid. In the absence of such measures, some rural households will need support to cope with the increasing cost of fossil fuels that they have no choice but to rely on.

Emissions target, timeframe and gap analysis

In 2018, Ireland had the third highest level of greenhouse gas emissions per capita in the EU, nearly 50% more than the EU average and nearly three times that of the countries with the lowest emissions.[114] Optimistically, this suggests that Ireland has a lot of scope to reduce its emissions to a level already achieved in other countries.

Table 1. Ireland's 2030 emissions targets (figures are rounded)[116]

SECTOR	REDUCTION	2018	2030 CEILING
Electricity	75%	10.5 MtCO2eq	3 MtCO2eq
Transport	50%	12 MtCO2eq	6 MtCO2eq
Buildings (Commercial and Public)	45%	2 MtCO2eq	1 MtCO2eq
Buildings (Residential)	**40%**	**7 MtCO2eq**	**4MtCO2eq**
Industry	35%	7 MtCO2eq	4 MtCO2eq
Agriculture	25%	23 MtCO2eq	17.25 MtCO2eq
Other	50%	2 MtCO2eq	1 MtCO2eq

More pessimistically, Ireland's high level of emissions suggests that aspects of the economy and built environment, such as our building stock and high level of car dependency, need radical change that many people will find difficult.

Ireland's commitment is to reduce greenhouse gas emissions by half by 2030 (compared to 2018).[115] In 2018, Ireland's emissions were 67.2 MtCO2eq (million tonnes of carbon dioxide equivalent). This must reduce to 30 MtCO2eq by 2030 and net zero by 2050. A linear reduction of Ireland's emissions to 30 million tonnes in the period 2022 to 2030 implies a cumulative reduction of over 7.5 percent per annum if the target is to be achieved.

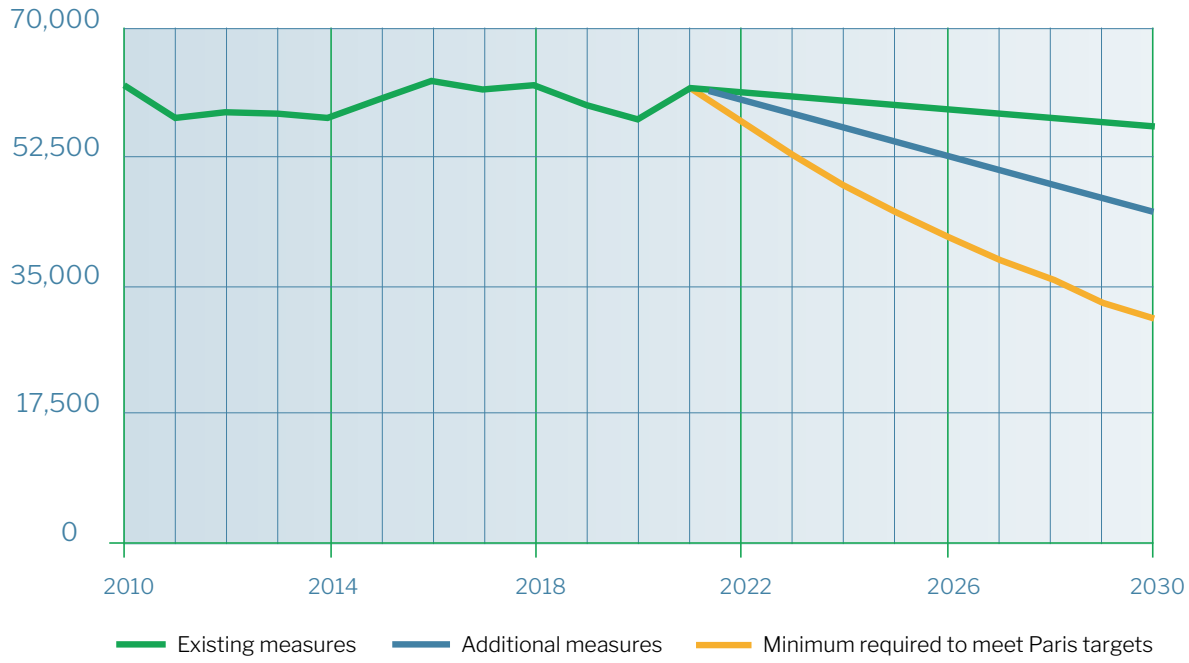
In advance of the publication of Ireland's revised climate plan and binding carbon budgets, there was a significant gap between what is required and what has been planned. The EPA's June 2021 projections are for Ireland's total emissions to remain at just under 58 million tonnes by 2030, with the possibility that additional measures could reduce them to just under 48 million tonnes.[117] In either case, there is both an annual gap and a growing cumulative 'carbon debt' as neither trajectory comes close to what Ireland has pledged to achieve by 2030.

In 2020, the average home emitted 5.5 tonnes of CO2 from energy use, three-quarters (73%) from direct fuel use and one quarter (27%) indirectly, from electricity use.[118] For the purposes of Ireland's climate targets, direct fuel use is counted under residential buildings' emissions and electricity use is counted under electricity emissions.

Irish residential emissions from heating and non-electric cooking must reduce from 7 million tonnes of CO2-equivalent in 2018 to 4 million tonnes by 2030. As shown in the above table, the implications of Ireland's emissions targets for households are a reduction in the emissions from direct fuel use by 40% from just over 4 tonnes CO2- equivalent per housing unit per year to 2.4 tonnes per dwelling by 2030 (based on existing housing stock). However, the EPA estimates the number of dwellings will be 2.3 million by 2030, a 15% increase, which means that average emissions from home heating and other direct fuel use must reduce by a further 13% per unit to less than 2.1 tonnes per dwelling in the next seven years.

The generation of CO2- equivalent emissions from electricity use is to reduce from just under 1.5 tonnes to less than 0.4 tonnes. However, this does not necessarily imply less use of electricity.

FIGURE 1 Ireland's emissions trajectory (existing measures, additional measures and minimum required) (000s tonnes)



While emissions from electricity generation must reduce by 2030, electricity use is likely to *increase* as the main energy source for heating and cooking. This is possible within Ireland's climate targets if that electricity is generated from renewable sources such as wind or solar. However, the achievement of Ireland's electricity target within residential households requires a near-universal shift of producers and consumers towards renewable electricity. The reduction of residential fuel use by 40% by 2030 implies that most dwellings will use electricity for heating and cooking by 2030.

Looking towards 2050, the target is essentially the elimination of the direct use of fossil fuels in residential buildings, which would mean a cultural reorientation of society away from open fires, oil- or gas-fired boilers and gas cookers, and towards electric appliances and electric heating systems. This in turn would only be possible if the electricity grid becomes sufficiently robust to prevent power outages following adverse weather that arise in certain, generally rural, areas at present and that are worsened by climate change.

Table 2. Average emissions reduction target by 2030 per dwelling

EMISSIONS PER DWELLING	Residential building fuel use (73%)	Electricity use (27%)	Total
Tonnes of CO2 per year (average)	4.02	1.49	**5.50**
Level of reduction by 2030	40%	75%	**49.5%**
2030 emission target (average, based on existing housing stock)	2.41	0.37	**2.78**
2030 emission target (average, based on 15% increase to housing stock)	2.10	0.32	**2.42**

The number of occupied dwellings in Ireland will continue to grow in the years leading up to 2050, which means that average emissions per dwelling must reduce even further as the same inelastic carbon budget/emissions ceiling must be stretched to cover more residential buildings. For example, an increase of 10% in the number of occupied dwellings must be offset by a proportionate (9.1%) decrease in average emissions per dwelling *in addition* to further reductions towards the 2050 emissions target.

Average emissions per unit is only useful to demonstrate the scale of change needed across Ireland's entire housing stock. Modern homes, built according to NZEB standards,[119] are expected to reduce their energy use by 80% or more.[120] As such, recently built and future homes are likely to emit less than 2.1 tonnes CO2-equivalent annually, while older homes (especially those with BERs of E, F or G) are likely to emit significantly higher than the current average of 4 tonnes. One estimate is that F or G rated Irish homes each emit 10.8 tonnes of CO2 annually for space and water heating.[121]

This justifies the Government's recent decision that "homes that were built and occupied before 1993 and have a pre-works BER of E, F or G" will be prioritised for the free home energy upgrade under the National Retrofitting Scheme.[122] However, BER is not taken into account when determining eligibility for the scheme. The new policy simply gives priority to those who are eligible based on income or age. Many poorly insulated houses will remain outside of the free schemes and are unlikely to be retrofitted by 2030 as their owners cannot afford even partial costs.

Number and BER of the housing stock

Census 2022 counted 2,123,590 permanent dwellings in Ireland, of which approximately 1.9 million are occupied.[123] Over the period 2009-2022, over a million domestic residences have acquired a Building Energy Rating (BER) certificate, with 23% of certificates rated A or B, 56% rated C or D, and the remaining 22% rated E, F or G. Nearly all (99%) of dwellings built since 2020 have a BER of A, meaning

that future housing stock is as energy efficient as possible to indicate under the existing BER framework.[124] However, there is no official estimate of the BER of those buildings that do not have a certificate. When the CSO compared buildings with a BER to the overall profile of the housing stock, higher rated BERs were over-represented among those dwellings with a certificate, and buildings rated E, F or G were underrepresented.[125] Other statistical analysis has reached the same conclusion.[126] There is a pressing need for an accurate assessment of the number of poorly insulated residential dwellings as this is the core indicator of what needs to change by 2030.

Census 2016 found over 1.55 million dwellings built before 2010.[127] There are BER certificates for approximately 933,000 of these dwellings, of which 217,000 (23%) are certified with a BER of E, F or G and 582,000 (62%) are rated C or D.

Given that E, F and G certificates tend to be underestimated in the BER data, it is reasonable to estimate that up to 25% of pre-2010 housing stock has this rating, which would imply 388,000 dwellings with a BER of E, F or G. Similarly, it can be estimated that 961,000 dwellings have a BER of C or D, to give a rough estimate that a total of 1.3 million housing units are rated C to G. Construction since Census 2016 does not affect this absolute figure as practically all dwellings built since then have an A or B rating. As such, retrofit targets must be related directly to the figure of 1.3 million dwellings with poor to moderate levels of thermal insulation.

Since 2016, some proportion of housing stock will have been retrofitted, either through the SEAI or privately. The SEAI's 106,147 retrofits between 2016 and 2020 implies at best a reduction from 1.3 to 1.2 million housing units rated C to G, although not all SEAI grants during that period were guaranteed to bring a home up to a rating of A or B. BER certification data suggests a wider annual improvement of the housing stock is occurring outside of the state's grant schemes, but there is a lack of definitive data to show the current energy efficiency status of Ireland's housing stock.

The decision to prioritise E, F and G housing will accelerate the upgrade of eligible energy-poor homes, but investment in deeper retrofits will decrease the overall volume of housing upgraded unless there is substantial expansion of the SEAI's capacity, bearing in mind broader constraints in the construction market in terms of the availability of labour or materials.

Retrofitting programmes

A large component of the move towards more energy efficient housing is a drive to encourage the owners of residential property (homeowners and landlords) to improve the energy efficiency of their housing. Carbon taxation is one mechanism that uses a price signal to incentivise such investment. The state has taken on the role to inform, encourage and support retrofitting. For example, the SEAI is tasked with "taking all actions to ensure the ecosystem is created to deliver on Ireland's retrofit ambition".[128]

The development of home ownership as the dominant tenure in Ireland was brought about by a range of state policies that favour home ownership, including tenant-purchase of social housing at a discount, land grants, loan schemes, mortgage interest relief and other policies.[129] One result of these policies is that households on relatively low incomes nonetheless were able to become homeowners. However, their ability to invest in substantial retrofitting is limited; a situation often characterised as 'asset rich, cash poor' households.

The Household Finance and Consumption Survey 2020 finds that household median wealth in terms of financial assets is €13,300, including a median level of savings of €8,700.[130] As such, half of all households have cash savings less than €8,700 despite most of them being homeowners.
For retrofitting policy and housing quality generally, the relatively low income and lack of cash savings of many homeowners means that they may lack the means to invest to retrofit their homes for energy efficiency, despite state grants.

Households who qualify for Fuel Allowance or several other welfare payments[131] are eligible for a Fully Funded Energy Upgrade (previously called the Warmer Homes Scheme).[132] Data is not available to show how many people with qualifying welfare payments are homeowners and therefore eligible for a Fully Funded Energy Upgrade. It is likely that many of them are renters in social housing or the private rental sector.

The average value of a grant under the scheme is €23,350 and the work is undertaken by SEAI's own contractors. Currently, it takes approximately 27 months from application to having the work completed. The SEAI also provides Individual Energy Upgrade Grants and a One Stop Shop Service for home energy upgrades, both of which include part-funding through SEAI grants.[133] Given the distribution of income and wealth, and the prevalence of asset-rich cash-poor households, it seems likely that there are a significant number of homeowners who are not eligible for the free upgrade but who have neither sufficient cash savings nor a high enough income to borrow to invest in retrofitting.

Many low BER ratings are found in the private rented sector, which raises the issue that landlords may have insufficient incentive to retrofit their properties. It has been estimated that more than half (55%) of private rented properties had a BER rating or D or less, including one in five (20%) rated F or G.[134]

A question for retrofit programmes is whether they should focus more on BER or on residential heating systems. The SEAI's national heat study concluded that more rapid decarbonisation could be achieved by replacing fossil fuels in buildings rather than relying on a higher BER to reduce a household's energy demand. The SEAI also recognised that asking customers to reduce heat demand before installing a renewable heating system" is also not financially viable for a large proportion of consumers in the analysis. Support scheme design that focuses on meeting the minimum levels of fabric performance to support a switch away from fossil fuel heating sources is likely to see more uptake and require less investment".[135] The SEAI continue to install oil and gas boilers in retrofitted houses, locking people into fossil fuel dependency and potential future energy poverty or deprivation, with just 15 heat pumps installed to June 2022.[136]

It seems unlikely that the state will provide the scale of income supplements required to allow households to afford to run all-electric heating systems in poorly insulated housing. Therefore any decisions to switch a home heating system to electric in the absence of retrofitting risks leaving households unable to meet their energy needs.

Housing inadequacy

The state has a range of policy instruments at its disposal to achieve housing adequacy in all its dimensions. The relevant issues for emissions and energy poverty are:

1. Standards and planning
2. Capital investment, tax breaks
3. Market interventions

On the first point, the value of NZEB/ZEB standards have been discussed above. Other aspects of standards include the requirement (or the absence of same) for solar panels to be included in new developments or as part of retrofits. Solar technology continues to improve and wider use of solar should allow for an additional net reduction in carbon emissions (even allowing for the carbon cost of producing and replacing solar panels over time).[137]

Microturbines for electricity generation could also be a requirement of building standards or planning, as could district heating systems.

Standards for social housing provided by all approved housing bodies as well as local government could be enhanced to model best practice or as a vanguard of the delivery of fully ZEB housing.

A minimum BER for the rental sector has been promised, but not until the next climate plan following 2024 research on this topic. Poor insulation in the private rental sector, alongside the prevalence of lower income households in this tenure, has been clearly identified as high risk for energy deprivation, which existing plans do not adequately address.

Secondly, the achievement of adequacy in existing housing stock requires capital investment, either by owners, directly by the state or indirectly through grants and/or tax reliefs. SEAI grants were addressed earlier. The *Finance Bill 2023* is to provide tax incentives to landlords to retrofit their properties. If explicitly combined with a timeline for a minimum BER standard for rental accommodation, this could provide an effective carrot-and-stick approach. There is also a strong rationale to tighten regulation on multi-property landlords sooner, giving the 70% of landlords with only one property more time to adjust. The low *disposable* income of many middle-class families is an understated part of the problem as high mortgage or rental costs and high childcare costs may mean that nominally higher income households cannot afford to invest in retrofitting.

Thirdly, the construction sector is constrained by the availability of labour (and to a lesser extent materials) to deliver both construction and retrofit. For example, the weakness of apprenticeship opportunities in Ireland is a longstanding criticism of the labour market that successive governments have not addressed. That said, there is evidence that new methods of building – including factory-building of housing for assembly on site – offer the potential for significantly more efficient delivery of units if these methods were adopted more widely.[138]

Income inadequacy

Alongside addressing housing adequacy, energy deprivation can only be eliminated if households have adequate incomes. The failure of the state to fully acknowledge and respond to the extent of income inadequacy weakens climate policy from a social justice perspective.

Median disposable income per household in Ireland was €43,915 in 2020, meaning that half of households had a lower income. Half of those who were unemployed had a lower household income than €27,557, half of those unable to work due to health problems had a household income lower than €20,049 and half of adults aged 65+ living alone had an income below €17,312.[139] Households with lower incomes tend to spend proportionately more of their income on energy, with lower income households and renters among those experiencing higher than average levels of price inflation.[140]

The state relies on four areas of policy to foster income adequacy:

1. Employment and minimum wages
2. Social protection core payments
3. Market regulation to lower consumer prices
4. Tax and levy changes to lower consumer prices

On the first point, industrial strategy and the evolution of the economy have led to the current distribution of employment and economic activity. A salient issue here is that Ireland has one of the highest incidences of low pay in the OECD (18% in 2019) and in-work energy poverty is a real concern, especially among renters, migrants and newer homeowners whose mortgage payments are onerous. The Low Pay Commission makes recommendations to the government on the rate of the national minimum wage, and the government has announced plans to raise this rate significantly to match 60% of hourly median wages within four years as a national 'living wage'.[141] It remains to be seen whether this lowers the incidences of low pay and in-work poverty.

Secondly, the Department of Social Protection provides 1.5 million recipients with a core income, with maximum rates varying from €220/week (e.g. Jobseekers Allowance) to €265.30/week (e.g. Contributory State Pension), although a substantial minority do not receive the maximum rate. Ireland has among the highest levels of market income inequality in the OECD, but social protection payments bring Ireland close to the EU average level of income inequality.[142] The risk-of-poverty rate in 2021 was 11.6%, meaning that one in nine households was at risk of poverty despite many being in receipt of social welfare payments.[143]

The MESL and other benchmarks demonstrate in itemised detail the inadequacy of welfare incomes versus the cost of meeting even a basic standard of living, in part because of the lack of public services versus comparable EU countries. The Pandemic Unemployment Payment of €350/week clearly illustrated the inadequacy of ordinary welfare rates. The fieldwork for this report provides multiple examples of households reliant on social welfare who are unable to cope with rising energy costs, including those who face daily *heat or eat* dilemmas. Specific social protection income supplements for energy costs are addressed in the next section.

The third lever to achieve income adequacy is to reduce the price of energy, which the state seeks to achieve through a mixture of market competition and regulation, both of which are overshadowed by the geopolitics of energy security. On competition, Ireland now has six gas and ten electricity suppliers,[144] which makes for a competitive marketplace with opportunities for consumers to switch provider to achieve savings. Competition is also meant to prevent suppliers from pushing up their prices. However, there are barriers for many consumers when it comes to switching. For example, many older people and others are not using the internet.[145] Also, one in six people in Ireland have literacy issues, one in four have numeracy issues, and over 40% find online tasks difficult,[146] with these issues likely to be concentrated among people on lower incomes, people with disabilities and older people. All these issues greatly limit many people's ability to shop for alternatives.[147]

The EPAP announces a wide range of regulations, including the widening of the definition of vulnerable customers to include financial vulnerability, which many NGOs had called for. This should assist most consumers to get the lowest tariffs for their energy, but follow up research by the CRU and government will be required to ensure that this is happening. There is scope for further regulation, and many interviewees in the fieldwork called for the CRU to do more. The regulations announced subsequently in the EPAP may have addressed some of these concerns. However, issues remain unresolved; for example, many NGOs expressed concern that standing charges are unregulated and often very high, regardless of how carefully a household limits their energy use. Some NGOs, such as the St Vincent de Paul, have advocated requiring utility providers to offer a social tariff to customers at risk of energy poverty.

Fourthly, the government decision to reduce VAT and excise duty on fossil fuels lowered consumer prices. There was widespread concern about price gouging by petrol stations, which may have reduced the effectiveness of this measure on transport costs. The universal nature of this tax cut was regressive, as higher income households that consume more energy gained more than lower income households. It was also poorly targeted, as at least the top third of households did not need this tax reduction to avoid energy deprivation. The opportunity was missed to raise revenue that could have been better targeted to those households that are experiencing deprivation.

Energy poverty, energy deprivation and excess winter mortality

Given that at least 1.2 million homes have a BER of C or worse and an estimated 1.7 million people have low incomes from welfare or low paid employment,[148] the issues of housing inadequacy and income inadequacy are deeply embedded features of the Irish economy. In this context, energy poverty, energy deprivation and excess winter mortality continue to be persistent features of society even when the economy is buoyant.

The state's main policy lever is a range of income supplements designed to assist households to meet some of their energy costs, which can be divided between universal payments and targeted payments.

Fuel Allowance is the main targeted income supplement for energy costs, which policy states is not intended to meet household energy costs in full. It provides €924/year and had 366,793 recipients at the end of 2021. In response to the energy price crisis, the Government allocated additional payments totalling €625 to Fuel Allowance recipients in 2022. The lump sum payments were funded from carbon tax revenue, but the link with carbon tax is not widely perceived by the public or even by some NGOs working on social justice.

From 2023, 80,000 or more additional households are expected to access the payment under newly expanded eligibility criteria, especially for the over-70s. Eligibility criteria for Fuel Allowance are problematic, with some households being excluded because of household composition despite having a low income and high risk of having unmet energy needs.

Another targeted payment, the Additional Needs Payment (ANP), is a blanket term covering the Exceptional Needs Payment and Urgent Needs Payment under Supplementary Welfare Allowance. In 2021, over 55,000 ANP payments were made at a provisional cost of €42.7 million, and a further 66,000 ANP payments were made in the first nine months of 2022.[149] These covered a wide range of needs, and assistance with energy costs are reported to be a minority of the allocations to date.

As part of the discretionary Supplementary Welfare Allowance, Community Welfare Officers can allocate a Heating Supplement to people who have special need of assistance with heating, such as for a medical condition. As of 2021, there were 1,101 recipients of this payment, down from 3,053 in 2011.[150] The HSE, in area CHO 9, provides a cash payment to support the energy costs of people with COPD as they need to constantly operate electric medical devices to help with their condition, with different rates paid depending on a person's address within the area. This scheme continues for historical reasons but is not available in the rest of the country.[151]

A quasi-universal payment is the Household Benefits Package (HBP), which includes an allowance of €420/year, the main beneficiaries of which are older people, as everyone aged 70 or older is eligible for the payment (one per household), although it is also available as a means-tested supplement for people under 70 on qualifying social welfare payments. By the end of 2021, nearly 520,000 households received HBP payments for electricity or gas,[152] most of whom are State Pension recipients. Given its universality for people over the age of 70, it might make more sense for the state to simply focus on the income adequacy of the State Pension, as long as the small number of older people not eligible for the State Pension currently benefiting from the HBP do not lose out.

Age Action has highlighted that from 1968 to 2012, the Electricity and Gas Allowances under the Household Benefits covered standing charges and a set amount if units of energy (e.g. 2,400 kWh "units" of electricity in 2011). They propose an Energy Guarantee for Older Persons that would use this approach rather than a cash payment, on the basis that this would transfer the risk of price fluctuation away from households on low fixed incomes that cannot cope with rapid price inflation. They also propose targeting income support at households in poorly insulated housing in addition to those who pass a means test.[153] There is no reason why these proposals need to be restricted to older people. Allocating a set amount of energy (e.g. 2,400 kWh of electricity) would help households on low fixed incomes reduce their exposure to the risk of energy price spikes such as have occurred since 2021.

In response to the energy price crisis, the government introduced two sets of electricity credits, valued at €400 in 2022 and €400 in 2023, which are automatically credited to household electricity bills. This was a highly expensive (€1.6 billion), poorly targeted measure that added to inflation and incurs a significant opportunity cost. It is reasonable to say that at least the top third of households did not need this intervention to prevent them from experiencing energy poverty or deprivation. If a third of this expenditure (€533 million) was better targeted, it could have been much more efficient and effective. From a climate perspective, the opportunity was lost to allow higher energy prices to act as a shock treatment to push households with the capacity to engage more seriously in energy conservation. Instead, the message from government was that the state will step in to pay people's bills when energy (including fossil fuels) becomes more expensive. The experience of an €800 subvention may give higher income households the false impression that the current energy crisis is overstated, whereas €800 will not be enough to allow lower income households to meet their energy needs in the two-year period 2022-23, especially those not eligible for Fuel Allowance.

As noted in Section 2 (e.g. Scott et al 2008), there has long been a view that income supplements for home heating should be temporary, to be overtaken by a permanent, long-term solution of improving home insulation and energy efficiency. However, many households are unable to attain energy-efficient housing, which means that they will require income supports for the foreseeable future. Moreover, the structure of the economy and the social protection system continue to reproduce households whose incomes are inadequate to meet their basic needs, as shown by MESL and SILC data, and therefore there will continue to be categories of household who will require income supplements until deeper, structural changes to the economy and socia policy occur.

Measuring energy poverty, deprivation and excess winter mortality

There is no set definition of energy poverty, but the expenditure approach is commonly used, where a household spending more than some proportion (e.g. 10%) of disposable income on energy is defined as experiencing energy poverty.[154] This approach has the advantage of being relatively easy to calculate, but it is problematic as it can include wealthier households with large properties or inefficient heating systems, and it can exclude households who spend less on energy simply because they go without energy that they cannot afford.

As one benchmark for basic energy requirements, the MESL proposes that a minimum expenditure on energy for heating, lighting and cooking would be 9.7% of an urban single adult's weekly budget in 2022 (€24.14) and 11.6% of a rural single adult's budget (€36.20). These calculations are from before more recent price increases.[155] Based on these figures, single adults in rural areas would be classified as in energy poverty even if they had an income sufficient to afford an MESL. Similarly, different urban households analysed spend between 5.9% and 11.3% of their weekly income on household energy in MESL 2022, and rural households spend between 6.2% and 11.9%. Seven out of 24 household types for which data is published would spend more than 10% of their weekly income on household energy even if they achieve a MESL.

Household consumption of energy may, in future, become a larger proportion of households' weekly costs. This could be due to carbon taxation and other price increases relative to other costs. It could also be due to displacement of other costs: for example, what is traditionally measured as household transport costs (e.g. petrol) may decrease in favour of electricity for home charging of e-vehicles. A greater proportion of people working from home may also lead to higher domestic energy consumption. There is a significant risk that policymakers might be tempted to move the threshold for inclusion (e.g. from 10% to 20%) to diminish the proportion of households counted in energy poverty statistics. A minimalist definition of energy poverty, such as only counting energy costs that exceed 15% or 20% of net income, would exclude many households for whom meeting their basic energy needs is prohibitively expensive.

An alternative measure is self-reported energy deprivation, for example using the EU Survey of Income and Living Conditions (SILC).[156] In 2022, 8.9% of individuals reported being without heating at some stage in the last year, and 7.4% reported being unable to afford to keep the home adequately warm (up from 3.2% in 2021).[157] Out of a population of 5.1 million in 2022, this represents 456,000 people being without heating at some stage and 379,000 unable to afford to keep their homes warm. Though income supplements undoubtedly protected some households, the figures for energy poverty and energy deprivation persist despite these welfare schemes, either because households are ineligible, unaware of the schemes, or else because the level of cash supplement provided is insufficient. It remains to be seen whether the further measures announced for late 2022 and 2023, including lump sum payments, reduce energy deprivation.

Energy deprivation last peaked at nearly 20% in 2013 before falling to 9% in 2018, and it has risen ever since. Energy deprivation among those at risk of poverty (i.e. on low incomes) peaked at 30%.[158] Those more likely to be experiencing energy deprivation include households where no one is at work or only one person, households with women more often than men, and renters more often than homeowners.[159] Unsurprisingly, deprivation (of all types) is concentrated in the bottom 50% of the income distribution.[160]

A limitation of energy deprivation statistics is that household with insufficient incomes can to an extent choose what form of deprivation to experience; some may go without heat, some without food, and others without warm clothes or footwear.

The margin between energy deprivation or sufficiency may be as little as €10 or €20 per

week for low-income households that are most at risk. It is easy to envisage how rising energy prices could tip large numbers of households into energy deprivation. As such, from a social justice perspective, measures to address emissions must be highly sensitive to how they impinge upon lower income households.

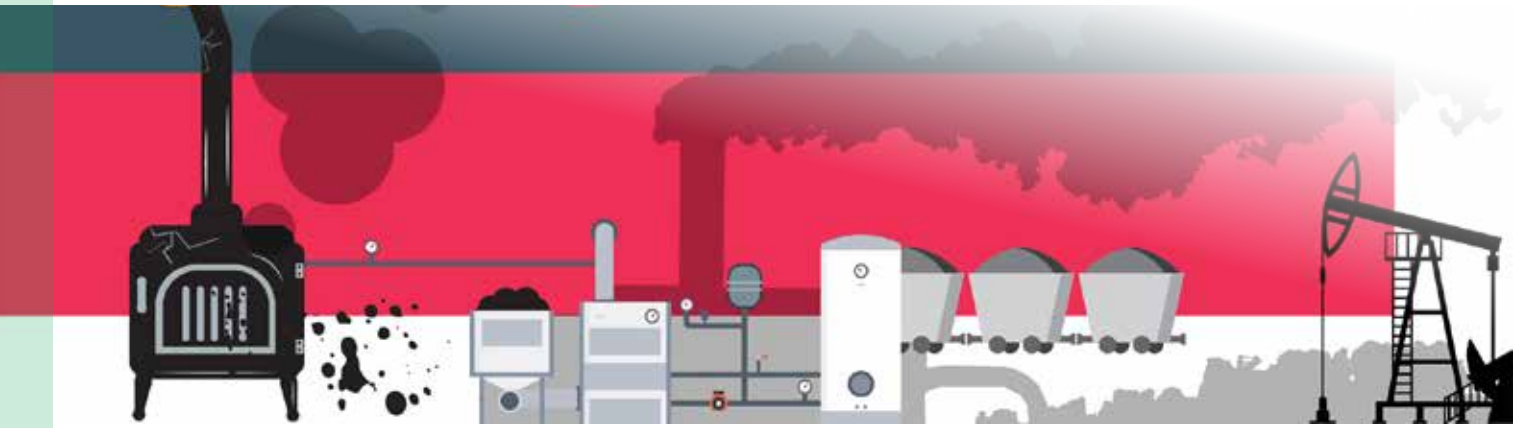
Another way to measure unmet energy need is through excess winter mortality statistics, meaning increased deaths occurring during the winter months above the mean mortality rate of the non-winter months.[161] One study found excess winter mortality of 18-28% in Ireland, the UK and southern European countries, while no such differential is found in the Nordic countries or other northern European countries where a greater level of home thermal insulation in the norm.[162] Another study found 19.7% excess winter deaths in Ireland in the period 1980-2013, the highest rate of all northern European countries and more than twice the rate in Finland or Iceland.[163] The implication of these studies is that thousands of people in Ireland have died prematurely every year due to poorly insulated housing stock and/or inability to afford an adequate level of home heating.

On an annual basis, it is easier to measure energy poverty or energy deprivation than excess mortality, as the latter is calculated across decades of data. However long-term policy outcomes should be measured in terms of closing the gap between Irish rates of excess mortality and that of the best performing European countries.

Other interventions to reduce both emissions and energy poverty

Aside from income supplements or the retrofitting of housing stock, another policy tool is to seek to influence household behaviour in favour of energy efficiency. An evidence assessment undertaken for the UK Department of Energy and Climate Change examined 48 behaviour change programmes and found that such programmes can be effective in returning energy savings "in the order of 1% to 3% per household" and that some, but not all, lead to durable energy reductions. However, households already using less energy have less scope for savings, behavioural interventions need to be tailored for different groups, and some barriers (such as physical layout) limit changes to behaviour.[164] Studies comparing the relative importance of building factors versus behaviours found that building factors are the predominant factor when explaining energy consumption, and behaviours and attitudes have relatively limited explanatory power.[165] Despite these bodies of research, the International Energy Agency finds evidence that behavioural interventions can have a significant effect, citing SEAI research that 5% of savings could be achieved in Ireland.[166]

Microgeneration of electricity, especially through photovoltaic solar panels, is another means to provide for a household's energy needs in a sustainable manner. While valuable in terms of potentially reducing the cost of electricity for a household, the level of energy generated is unlikely to compensate for a situation where energy usage is driven up by poor insulation.



Courtesy Friends of the Earth Europe

3.2 Synthesis of key findings from the research

The findings from Section 1 (policy documents), Section 2 (interviews and information collated) and Section 3.1 (desk-based analysis) have been combined in this section. Findings have been grouped together under thematic headings.

The synthesis may fail to capture the nuance and complexity of reducing residential emissions, energy poverty and energy deprivation. However, it gives a sense of the themes and issues emerging from the research. A few of the criticisms have been addressed in the most recent government policies (see Section 3.3).

Ireland's carbon debt is growing

- Ireland is behind on the achievement of climate targets and continues to have high emissions in many sectors including residential emissions, which is generating a substantial 'carbon debt' while also meaning that the annual reductions required before 2030 are more onerous if Ireland is to meet its international commitments.

Energy poverty is complex

- Energy poverty interlinks income inadequacy, poverty, energy, housing, social inclusion, health status, location (urban versus rural), transport and consumer protection.
- Energy poverty and energy deprivation are concentrated among some household types and some types of housing, including people living alone, people with disabilities, lone parents and renters.
- Some stakeholders perceive that "the government" lacks sufficient strategic vision to address the complexity and root causes of the issue. This criticism may equally relate to ministers, their advisers and to officials in their departments and agencies.

Poor thermal insulation is largely about older housing stock

- The poor quality of thermal insulation in the Irish housing stock has been known for decades.
- Not all social housing is well insulated and Approved Housing Bodies may lack the capacity to afford retrofitting.
- Tenants in private rented or social housing generally have no ability to influence the insulation level of their homes.
- Traveller-specific accommodation, including trailers, can have very poor thermal insulation, on top of multiple disadvantage already faced by many Travellers.[167]

Heat pumps are important but not a panacea

- The retrofit and heat pump targets set out in *Housing for All* are not being achieved. The Quarter 3 2022 update does not even include heat pump statistics,[168] and neither set of data is included in the *Housing for All* statistics dashboard.[169] Updates are not published under the *National Retrofit Plan* but parliamentary questions demonstrate the low volume of heat pumps installed.
- The electricity grid in rural areas remains vulnerable to outages due to adverse weather, making it risky for households to rely entirely on electric heating systems (including oil and gas boilers that require electricity to function). This can lock people into burning solid fuels.
- Heat pumps will not work for all households or housing types, and not enough consideration has been given to alternatives, including solar panels and district heating.
- Microgeneration of electricity for homeowners (e.g. solar) lacks support.

Income inadequacy must be addressed to reduce energy deprivation

- Income inadequacy is a larger problem that surrounds inability to afford energy, and recent welfare increases have not been adequately benchmarked or indexed.
- Studies in the UK have found that most lower income households have already adopted whatever behaviour changes they can to reduce the cost of energy, meaning that solutions need to be found in other policy areas to address factors outside of their control.
- One-off payments granted in Budget 2023 will help many people cope with the immediate increase in energy prices but will not address the fundamental issue of income inadequacy.
- Social protection income supplements such as Fuel Allowance do not reach everyone who needs them, especially those in poorly insulated housing, and are not sufficient to prevent energy deprivation for some households. There is scope to redesign these payments, not least to remove qualifying criteria that make households ineligible for reasons not related to income.
- The definition of vulnerability is too narrowly focused on disability and excludes people who have inadequate incomes.
- Self-disconnection has been swept under the carpet. It leads to lower income households experiencing energy deprivation and paying extra for reconnection charges.
- The poverty premium is not properly acknowledged or quantified, despite that customers on the lowest incomes or in debt can end up paying a higher tariff for energy, and debt-repayment (e.g. through card meters) can be punitive. MABS have made recommendations for restructuring energy debt repayments.
- Behaviour change is criticised in fieldwork, from people's financial inability to change behaviour due to carbon tax to the fact that most of those in energy poverty are already maximising what radical actions they can take (such as minimising heat use or spending more time in bed). Some people are already putting their health at risk by living in cold or damp conditions, and therefore responsibility for their inability to change behaviour cannot be levelled at them. Similarly, those most at risk of energy deprivation are often least able to complete assessments or grant applications.

Energy deprivation drives poor health outcomes

- Energy deprivation has negative health outcomes, including contributing to much higher levels of excess winter mortality in Ireland than in other northern European countries.

Some national policies contradict climate policy

- The *National Development Plan* is not aligned with carbon budgeting and if fully implemented would excess the sectoral emissions ceiling.
- Environmental NGOs are concerned about the future direction of planning policy and the potential loss of opportunities to seek judicial reviews.

Greater levels of partnership with NGOs will require support

- Policy development does involve important consultation with NGOs and other stakeholders, but there is a desire for stronger structures and deeper engagement.
- NGOs lack sufficient funding and support to enhance their capacity for this type of work given its complexity.
- Current funding models, which require organisations to operate at scale, have squeezed out community and voluntary sector involvement in retrofitting, such as Energy Action, with a consequential loss of expertise in the NGO sector.

- The action of some NGOs to join forces on the issues of social justice and greenhouse gas emissions supports the view that seeking to broaden the base of public acceptance for climate actions is emerging as a successful strategy. The fieldwork notes the joint action of 10 NGOs in June 2022. Another recent example was 41 NGOs supporting a Friends of the Earth initiative.[170]

There is greater scope to draw on international experience

- Ireland could learn more from other European countries beyond the UK, such as Finland or the Netherlands, and from organisations like the ECEEE.

Market-focused approaches are criticised

- The CRU is widely criticised and is called on to regulate differently, with a greater focus on consumer protection rather than providers.
- Renewable electricity could be much cheaper for consumers, and changes to the regulation of electricity pricing could drive demand for renewable energy.
- Standing charges are a high proportion of energy bills and seemingly underregulated. There is a case for abolishing or limiting standing charges so that utility bills are more clearly based on usage, maximising incentives for energy efficiency.
- Carbon taxation is not popular and there are perceived injustices in its application, such as aviation's exemption from the tax alongside continued fossil fuel subsidies.
- The government is called on to step in to resolve small things which affect behaviour change like restrictions on clothes-drying on apartment balconies which require or push tenants to buy and use energy-consuming drying machines.
- There are market constraints on retrofitting that have not been actively addressed, in terms of ensuring sufficient labour and materials on the scale needed.
- Landlords lack incentive to retrofit their rental properties. A minimum BER for rented properties was promised but never introduced.

Administrative processes are criticised

- Administrative processes, such as the operation of SEAI schemes, are criticised. Not all stakeholders had a good understanding of policy implementation or operational issues.
- The Fully Funded Upgrade scheme (formerly Warmer Homes Scheme) excludes too many people.
- A push to online only, based on a 'responsibilisation' approach to customers, is seen as problematic. Customers not using the internet are not given equal opportunity to access preferential tariffs, ability to switch provider, etc.
- Community energy advisers could give people person-to-person advice on the full range of their energy needs.

There is a need to modify how retrofitting is financed

- Homeowners need access to affordable credit to assist them with the high upfront costs associated with part-funded SEAI schemes.
- The finance of retrofitting requires more sophisticated design, and could, for example, involve EIB-backed loans or tap into other EU funds.

3.3 New policy

At the time this research was conducted, two key policy documents were anticipated from the Government. The interviews and submissions received during the fieldwork for this report occurred before the publication of these documents in December 2022:

- *Climate Action Plan 2023*
- *Energy Poverty Action Plan*

This section seeks to answer two basic questions: whether the policies address the wide range of concerns found by this research, and are they likely to achieve their aims (even on their own terms).

Climate Action Plan 2023

On 21st December 2022, the government published *Climate Action Plan 2023,*[171] which is the first such plan published under *Climate Action and Low Carbon Development (Amendment) Act 2021* and the second since the original 2019 plan.
It provides detailed analysis of the nature of climate change that captures the urgency of our situation.
Its overall goal is setting out a roadmap for halving carbon emissions by 2030 and achieving carbon net neutrality by 2050, which are commitments already found elsewhere in government policy, including the Programme for Government.
It positions itself as prioritizing systemic change yet also sees facilitating climate-friendly individual decision-making among the public as vital to the creation of a carbon-neutral society.

The focus here is just on those parts of the plan that relate to residential emissions and energy deprivation.

Socially progressive residential retrofitting is central throughout the document, the ultimate vision being an Ireland where homes are "warmer and cheaper to heat". It is one of the five stated "most important" decarbonisation measures over the next ten years. Retrofitting is also emphasized as an opportunity for job creation and delivering a just transition. The plan does not make new commitments in relation to retrofitting. It reiterates those contained within the *National Retrofit Plan*, which originated in the earlier climate plan. Namely, these are to retrofit 500,000 homes to a BER of B2 or a cost optimal equivalent by 2030 (120,000 by 2025) and to install 680,000 renewable energy heat sources in new and existing homes. The plan states that this will require an increase of almost fifty times the level of deep retrofits that were conducted in 2019, the year of the first climate plan. Buildings will be constructed to an NZEB (near-zero emissions building) standard by 2025 and a ZEB (zero emissions building) standard by 2030. The plan also allows room for increasing retrofitting targets as one of several potential means of closing the unallocated emissions savings gap that is left open by current commitments. The plan will also support the delivery of low-cost consumer finance for home retrofit.

The plan does not go into detail on retrofitting in the rental sector. It references it in its discussion of the financial sector, as retrofitting loans for the rental sector are a climate-friendly product that could be developed. It also reiterates a commitment for the *Finance Bill 2023* to contain a tax incentive for landlords to undertake retrofitting while allowing for their tenants to remain in place. Otherwise it states that specific provisions for retrofitting in the rental sector will be developed in future climate action plans following the completion, planned for 2024, of research by the ESRI on same.

The plan commits in 2024 to the "development of regulations to effectively ban fossil fuel boilers in new non-residential and existing buildings undergoing major renovation where practical." However the plan does not explicitly address the phase out of fossil fuel boilers in existing residential buildings.

With regards creating jobs in retrofitting, the plan references the commitments made in the *Skills for Zero Carbon* report and the finding of the Expert Group on Future Skills Needs that retrofitting will require a workforce expansion from 3,990 in 2021 to 17,400 in the coming years.

In terms of funding, the plan states there is potential for taxation measures to be used to meet retrofitting targets and that environmental tax measures will be regularly reviewed. It also references carbon tax receipts which should total €9.5 billion by 2030, some €5 billion of which has been ring-fenced for retrofitting.

The plan also makes several policy commitments in the area of governance that are relevant to retrofitting. These include an expansion of the role of the Climate Action Delivery Board with regards making recommendations and establishing task forces in areas including retrofitting; and the establishment of the Heat and Built Environment Delivery Taskforce.

Critique of the Climate Action Plan 2023

The focus here is on the strengths and weaknesses of the *Climate Action Plan 2023* with respect to reducing both residential emissions and ensuring households can meet their energy needs.

One clear strength of the plan is the consolidation of the sectoral emissions ceilings and carbon budgeting as the central governance tool to direct economic activity away from fossil fuels and other sources of emissions. A criticism of the plan is that it provides for annual reduction of 4.8% in the period 2021-25 and 8.3% in the period 2026-30, which can be interpreted as pushing the 'heavy lifting' outside of the remit of the current government. This back-loading of emission reductions begs the question of whether the government's intermediate target of reducing residential emissions from 7 million tonnes of CO2-equivalent to 5 million tonnes by 2025 can be achieved.

A more immediate concern is whether the emissions ceilings and carbon budgets can be enforced. There is a serious risk that the ambitious targets will not be met. As shown in Section 3.1 above, the projections in a 2021 EPA study shows that even if "additional measures" are taken, Ireland will fall far short of meeting the 2030 targets.[172] This analysis is confirmed in a 2022 updated EPA study, which presents a similar gap analysis to the one shown above.[173] The new climate plan addresses these EPA projections explicitly by noting that full implementation of measures will be required alongside future new measures to achieve Ireland's statutory targets for emissions reduction. On page 30, the plan candidly presents the data on emissions, which show higher emissions projected for 2021 than occurred in 2011. While there has been significant population growth during this period, the level of emissions is shown starkly, with no significant downward trend except during economic recessions.

The plan re-commits to retrofitting 500,000 homes by 2030 and installing 680,000 renewable energy heat sources in both new and existing residential buildings. Based on progress to date, these targets are implausible. A significant proportion of the renewable heating target will be achieved through new build, but the level of retrofit achieved to date is a small proportion of the scale needed to achieve these targets. There is no evidence presented in the plan that the SEAI and other public agencies can scale up their activities sufficiently, nor is there evidence that enough materials and labour will be available to be directed to retrofitting. There is a need for much more fine-grained analysis of the unit output of emissions by dwellings, and more detail about both the financial and time budgets required to achieve retrofit targets.

In the *Climate Action Plan 2023*, the term climate justice is used twice while just transition is used 158 times. The plan's discussion of just transition emphasises the labour market, but also encompasses welfare measures funded by carbon taxes and the need for visible fairness in climate policies. To date, although carbon tax revenues have funded welfare and other offsetting measures, this is not widely known.

In relation to energy poverty specifically, it is mentioned four times in the 284-page plan, while the term energy deprivation is not used. Mention of energy poverty is linked to the SEAI Warmer Homes Scheme three times, including one statement that nods to social justice concerns:

"The shift away from fossil fuel use in the built environment must be done in a manner that is consistent with the principles of a just transition, considering the needs of particular groups in society and addressing energy poverty. This plan, therefore, includes a series of measures aimed at supporting those least able to afford to retrofit in private dwellings and commitments to continue the existing programme of retrofits in our social housing stock."

The plan also acknowledges that the number of households affected by energy poverty is increasing. The solution for this, in the plan, is for consumers to receive "the full benefit of low-cost renewable energy" while also reducing and changing household demand for electricity, such as encouraging people to make more use of off-peak electricity.

It can perhaps be surmised that more detailed treatment of energy poverty and energy deprivation was left to the *Energy Poverty Action Plan* (EPAP), although the EPAP is not mentioned in the climate plan.

Energy Poverty Action Plan

On 13th December 2022, the government approved a new national *Energy Poverty Action Plan* (EPAP).[174]

A superficial change is that the EPAP policy document is an "action plan" whereas previous governments had adopted a "strategy" on energy poverty. However, the content of the previous document was similarly a list of actions, so the new title is accurate. The Minister's Foreword places the EPAP firmly within the *Climate Action Plan 2023* as part of a just transition. The EPAP also refers to the *Roadmap for Social Inclusion and Housing for All* as wider policies or strategies that it intersects with.

The EPAP lists actions that were already taken in response to recent energy price inflation, such as the additional €600 electricity credit for households and social welfare lump sum payments announced in Budget 2023, reduced VAT on energy bills from 13.5% to 9%, plus stronger consumer protection measures under the CRU, which include an extended moratorium on disconnections. New policies were also announced, including a €10 million fund approved by Government to further support people in energy poverty or at risk of energy poverty, which will be used to bolster suppliers' hardship funds, including for households on pay as you go (PAYG) meters and in recognition that some households "may not be able to access other sources of assistance".

An additional €148 million will be invested in the Warmer Homes Scheme to retrofit low-income homes, alongside €248 million sourced from the European Regional Development Fund (ERDF) for the period 2022-27. The EPAP restates the retrofitting and heat pump targets from the *National Retrofit Plan.*

The definition of vulnerable customer will be extended to people who are financially vulnerable, to include people in receipt of Fuel Allowance, Job Seekers Allowance for over six months, Working Family Payment, One-Parent Family Payment, Domiciliary Care Allowance or Carers Allowance. This change will mean that these households are included in the disconnection moratorium periods, up until March 2023.

The EPAP was developed on a cross-departmental, cross-agency basis. A steering group has been set up with a mandate to report annually on activity and progress under each of the action plan's actions. The governments' actions are being supported by communications campaigns, in partnership with MABS and ALONE. The *Reduce Your Use* campaign is a general-purpose call for energy efficiency to save money, while the *Stay Warm and Well* communications are focused on those who cannot afford energy, to signpost them to available supports so that they can keep the heat on to an adequate level.

The EPAP commits to improving how energy poverty is measured and establishes a new partnership work programme with the ESRI to do this. It also acknowledges the core principles from the earlier strategy, namely:

- Adequate supplies of light, heat and power are fundamental to being able to participate in society and essential for social inclusion.
- Energy poverty is a function of three elements: a household's income, the cost of energy and the level of energy efficiency of the home.
- Energy poverty is strongly correlated with basic deprivation i.e. that it is a symptom of inadequate resources to cover living costs rather than an energy only problem.
- Energy poverty has long term debilitating effects for individuals and society with growing evidence that it contributes to higher levels of respiratory and cardiovascular disease, excess winter mortality and overall states of mental health and wellbeing.[175]

Critique of the Energy Poverty Action Plan

This section analyses the strengths and weaknesses of the EPAP.

Some of the actions taken by government had low visibility (such as the VAT changes and zero-rating of the PSO levy) so the EPAP's listing of these actions is useful. Some additional measures were also taken in the EPAP, which recognises that high inflation is likely to continue in 2023. It presents itself as an evolving policy, with scope to review measures as conditions in the energy market change.

Importantly, the announcements made in the EPAP validate and address two key issues raised through the fieldwork, which are concern about pay-as-you-go (PAYG) metering and the definition of 'vulnerable' customers. The €10 million for hardship funds is focused on PAYG customers who are outside of the moratorium on disconnections because of the nature of paying by meter top-ups. The EPAP recognises self-disconnection among PAYG as a concern and notes the lack of data ("little visibility") on this issue.

The new, more expansive definition of vulnerable customer addresses the criticism that the original definition was the minimum permitted under EU rules. The recognition of financial vulnerability as a form of vulnerability is an important acknowledgement that income inadequacy is a driver of energy poverty, alongside disability or older age.

However, an immediate concern is that this has been announced as a temporary expansion of the definition not a long-term change. DECC will legislate to extend the definition of vulnerable consumers to include financial vulnerability for the winters 2022/2023 and 2023/2024, meaning that those who are financially vulnerable will only be included in the disconnection moratoriums that occur between October 2022 and March 2023. This decision ignores the fact that many financially vulnerable households have experienced energy deprivation for decades before the current energy price crisis and will continue to experience it in the future unless financial vulnerability is permanently integrated into energy policy.

A linked criticism of the EPAP is that it was apparently developed "in response" to the "unprecedented" energy price inflation in 2021-22, rather than as recognition that unmet energy need is a long-term social problem with unique characteristics that distinguish it from other forms of poverty. This suggests that the government might not have developed an energy poverty plan in the absence of the current energy crisis. There is also no commitment given to review or update the EPAP. It is notable that the EPAP frame people as "consumers" (the language of the market) rather than rights-bearers.

As evidence of the longstanding issue of energy poverty, the EPAP notes the high level of arrears in July 2022 (139,920 gas customers and 237,355 electricity customers), with the recent crisis only accounting for a small proportion of these arrears. The level of arrears is likely to grow significantly following winter 2022 and continued high prices through 2023. The electricity credit brought 95,000 households out of arrears, although a more targeted policy could have been far more efficient and effective.

The EPAP notes the criticism across the EU that only one third of energy expenditure on energy supports was targeted at "vulnerable" groups. The Central Bank's analysis of Budget 2023 was that €2 billion of spending was not targeted and would contribute to further inflation.[176] To spell this out, many households did not need the electricity credit, but received it anyway. Given that it was not a necessary expenditure, there is a clear opportunity cost of not targeting the measures to households who will still struggle to meet their energy needs. It is hard to find a justification for this kind of non-targeted policy in terms of either sound fiscal policy or as an anti-poverty measure.

The tightening of regulation is a significant strength of the EPAP. These measures include suppliers' obligation to put customers in financial hardship on the most economical tariff, extending repayment plans to at least 24 months, reducing the proportion of debt allowed to be deducted from PAYG top-ups, no charge on PAYG customers moving to billpay and

PAYG customers not being barred from billpay due to being debt flagged. Customers engaging with their suppliers are not meant to be disconnected under the Energy Engage Code, but it is not clear from the EPAP whether this regulation is working. EPAP envisages a role for MABS when customers are in arrears, which indicates that there is still a problem with customers not engaging with their suppliers despite the protections available to them.

There is also insufficient action to address the situation of tenants in the private rental sector who are more likely than average households to have lower incomes, poorer insulation and fossil fuel heating systems that they may not be able to do anything about.

The EPAP addresses some specific concerns from civil society. For example, the fact that many Traveller families did not benefit from the electricity credit is to be resolved so that families receive payments from both the first and second schemes.

A weakness of the EPAP is apparent in the data analysis underpinning the strategy. There is overreliance and potential misinterpretation of ESRI analysis based on the SWITCH model. The focus on how budget measures affect income deciles across the whole population lacks sufficient detail to judge whether households most at risk of energy deprivation will be better or worse off. While the bottom 10% in the income distribution may gain some amount on average from budget measures, this average may include considerable variance by household type and the level of energy expenditure by household is also likely to vary significantly based on home insulation, household composition, illness or disability, and other factors. The modelling also assumes that households most in need received the relevant welfare supplements, whereas the experience of NGOs is that, for example, many lower income households do not qualify for Fuel Allowance due to non-income eligibility criteria, such as household composition rules or the requirement to be on a qualifying welfare payment if aged under 70.

The argument in the EPAP that "current government policies to alleviate energy poverty are targeted broadly at those on lower incomes" is an exaggeration. The Central Bank pointed out that €2 billion of Budget 2023's measures were poorly targeted. By implication this is a criticism of the electricity credit as it makes up by far the largest proportion of those measures.

There are also aspects of targeting that are absent from the EPAP. While dwellings eligible for the SEAI's free upgrade scheme will be prioritised if they have a BER of E, F or G, eligibility for the scheme remains based on household income and receipt of certain welfare payments, not a dwelling's BER. The extension of Fuel Allowance to more households, especially people aged 70 or older, will increase eligibility for the SEAI's free schemes and many of these households are likely to be in poorly insulated housing, but there remains a gap in policy where a significant proportion of housing with BER E, F or G will remain outside of the retrofit scheme.

The EPAP does not present clear quantitative targets for the reduction of energy poverty or deprivation. This is mainly because of the new commitment to research that will define and measure energy poverty. However, the lack of targets is a weakness, especially as energy poverty and energy deprivation are likely to rise significantly if high levels of inflation persist through 2023 into 2024.

The issue of quantification also arises for the cost and nature of retrofits being carried out. The EPAP shows the average unit cost for retrofitting rising from €3,450 in 2017 to €18,753 in 2022. This indicates the cost of deeper retrofitting, however the lack of data on the type of retrofits that occurred makes it difficult to judge unit costs for the deep retrofit that are needed to meet the commitment to bring 500,000 homes to a high standard of insulation.

The EPAP notes that other schemes also contribute to the target, not least local authority retrofitting of social housing and community schemes, however there is no unified table showing how different housing sectors will contribute to achieving the

overall residential emissions target. The absence of this detail undermines confidence that the overall target will be achieved.

The research and evidence section of the EPAP is generally weaker. It admits the lack of accurate data on households experiencing severe levels of energy poverty. However, the plan downplays the ESRI finding that 29.4% of households were at risk of energy poverty in June 2022, possibly on the basis that figures on energy deprivation tend to be significantly lower than figures on energy poverty. Given that 1.5 million recipients receive a core income from the department of social protection (and most rely on this as their main income) and given that Ireland has one of the highest incidences of low pay in the OECD (18% in 2019),[177] the EPAP appears to underestimate the extent of income inadequacy and poverty across Irish society.

The research goals set out in the EPAP are worthwhile, but the central research question must be the absolute number of households affected by energy poverty/energy deprivation, however this is to be defined in future. No independent academic or NGO involvement is envisaged in the research group, which means that it will lack independence from the state, which undermines its credibility.

Similarly, the existing Energy Poverty Steering Group also lacks any independent expert or NGO representatives. The commitment to an annual plenary session at which NGOs will have their voices heard is a wholly inadequate mechanism that misses the opportunity to tap into the expertise available across academia and the NGO sector.

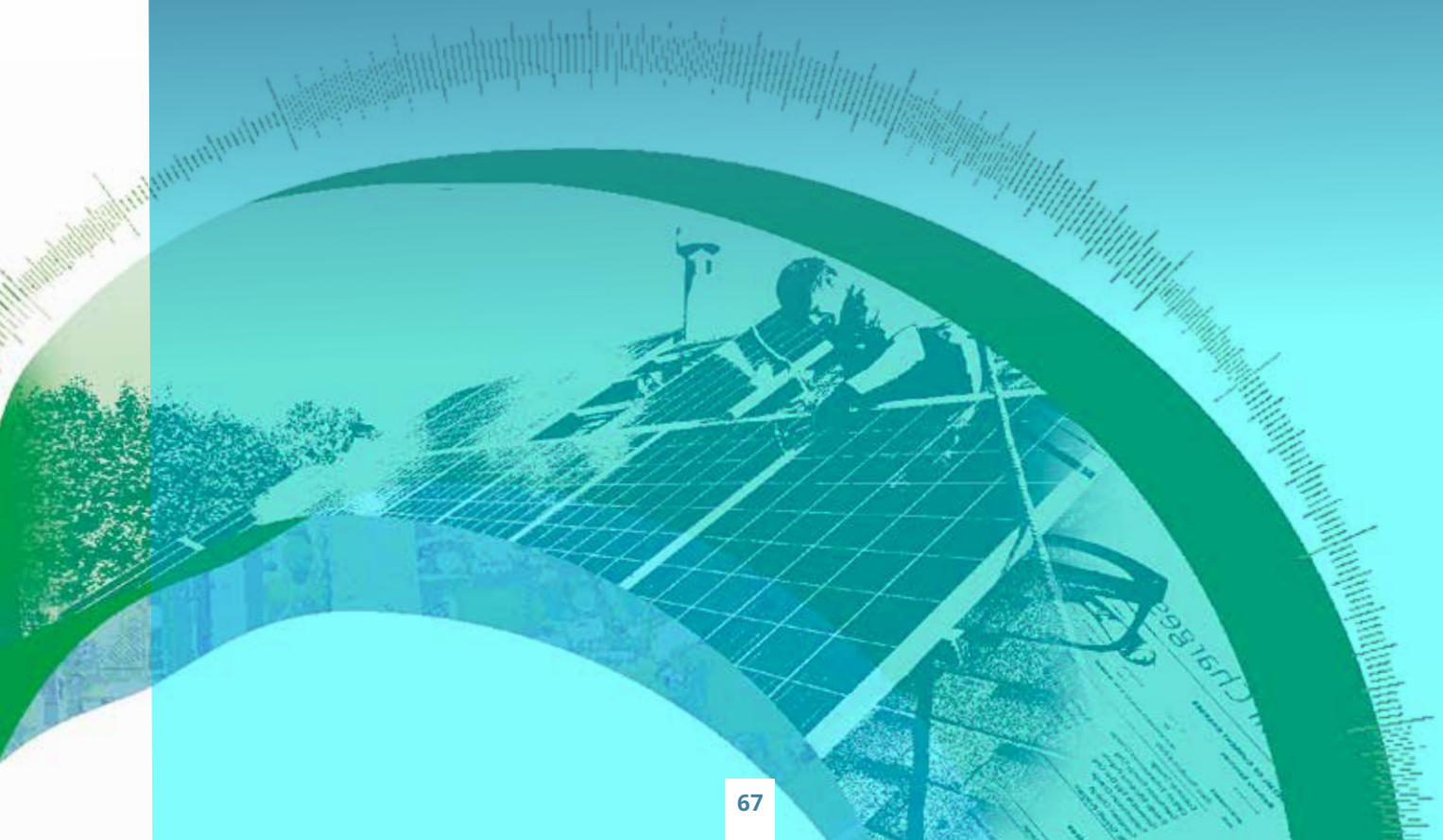
An important strength of the EPAP is that is recognises that "there are many people for whom reducing energy use is simply not possible or advisable" at whom the government is targeting its *Stay Warm and Well this Winter* messaging, to avoid households failing to use an adequate level of energy due to fear of unmanageable costs.

Overall, the EPAP usefully summarises the range of actions taken and to be taken to address high energy costs, but it is not comprehensive in its analysis. It lacks measures to demonstrate how capacity will be built in the SEAI and across the construction sector to enable retrofit targets to be achieved. It also lacks any quantitative target or commitment to reduce energy poverty/energy deprivation, which is a fundamental weakness. It does reiterate the general government commitment to reduce consistent poverty to 2%, but current data shows consistent poverty to be rising rather than falling. Ultimately, the EPAP does not offer a holistic approach likely to ensure that energy poverty and deprivation will actually decrease.

Section 4: Recommendations

This section is focused on those proposals with the greatest potential to be effective and impactful in the areas of social justice and the reduction of emissions. This report provides five overarching requirements for a win-win energy poverty strategy coupled with climate action.

It also makes 49 specific recommendations, across a range of areas, which emerged from the synthesis of the fieldwork, desk research and analysis.



Overarching Requirements

A) A fully integrationist climate justice approach should be adopted by the government, to formally acknowledge that the achievement of emissions targets must be progressed alongside a radical reduction in energy deprivation. Economically optimal climate policies are not viable without widespread public acceptance and achieving a greater level of support to transition away from fossil fuels is contingent upon addressing the unmet energy needs of many households.

B) The government should formally recognise that **energy deprivation in the context of climate action is a complex social problem,**[178] which means that it requires a systematic and holistic solution – for example, addressing the wider context of household income and housing conditions, rather than overly narrow definitions of energy poverty and merely addressing the worst instances of energy deprivation. In a complex social problem, piecemeal or narrow interventions have the potential to be counterproductive in the absence of a systematic approach. For example, the untargeted electricity credit is a potentially counterproductive measure insofar as it reduces the incentive on households to reduce their emissions and fails to efficiently target resources to those in most need of support.

C) The government should recognise **that energy deprivation is occurring within the constraints of inadequate income and inadequate savings or credit,** meaning that many households lack the capacity to react to price signals and cannot invest in opportunities to achieve longer-term energy efficiency. As such, the government must rely less on market mechanisms and it should allow wider access to SEAI free schemes, grants, loan schemes or other models of financing retrofit, street-by-street insulation programmes, district heating systems, and other more substantive interventions. The drive to reduce residential emissions and energy poverty should be coupled with the commitment in the *Roadmap for Social Inclusion* to reduce the number of people in consistent poverty, which in turn means addressing the structural reasons that consistent poverty is concentrated among certain types of household.

D) The drive towards reducing both residential emissions and energy deprivation must be accompanied by much **greater partnership, transparency and the generation of a collective sense that this is a national effort** of consequence for the betterment of society, in a similar way to how COVID was responded to as a national emergency, and similarly to how national electrification was a major national effort at the time. The potential to reduce energy demand and to provide renewable energy that is cheaper and plentiful should be part of this collective endeavour.

E) **Robust quantitative, quarterly targets for reducing energy deprivation and for reducing residential CO2 emissions should be set and reported on quarterly (if not in real time)** as the central indicators of progress in this area of public policy, underneath the sectoral emissions ceilings.[179] This will require investment in better data, including timely data on household energy deprivation. Quantitative data should also be generated to at least estimate the BER of all residential dwellings, regardless of tenure, with quarterly updates to this data as retrofitting occurs. The transparent quantification of targets and quarterly progress must be used to drive greater scale, pace and ambition by government to the achievement of reducing carbon emissions and energy deprivation.

Recommendations

Beneath these high level and strategic requirements, the findings in the report lend themselves to a wide range of specific recommendations. Some address niche issues whereas others have wider impact. They are grouped under general headings but are not listed in order of importance or priority.

Assisting people to retrofit or to reduce energy consumption

1) The government should consider providing free or subsidised BER assessments to lower income households, as a way of encouraging households to act on their level of energy consumption.

2) Steps should be taken to ensure that all housing with BER of E, F or G is included under sufficient incentives and/or supports in the retrofit schemes.

3) The SEAI should design new schemes – including zero interest or low-cost loans – to meet the needs of the many households currently ineligible for free schemes but unable to afford existing part-funded schemes.

4) Community energy advisors, as a face-to-face support for households, should be provided as a low-tech way of assisting households to transition to lower carbon energy use. One possible model of good practice that should be examined is Cork City Council's home energy upgrade office.[180] A helpline could support the roll out of energy advisors.

5) A multi-criteria cost-benefit analysis should be conducted – based on emissions reduction and energy deprivation reduction as well as investment costs – to determine whether it is better to deeply retrofit a smaller number of poorly insulated dwellings (F or G rated) or to rollout a much quicker and larger volume of basic insulation measures.

6) The SEAI and other agencies should reappraise their communications, as they appear to underestimate the difficulty of ordinary people in understanding the benefits of retrofitting. More presentations of the benefits of energy conservation should be made at a practical, local level, which is a relatively low-cost, low-tech approach as opposed to SEAI mentors operating exclusively online. While the SEAI has expressed willingness to present to community groups on request, this is not well known, and more effective alternatives could include working directly with NGOs and community organisations, pop-up shops or demonstration projects for people to visit.

7) A quality mark scheme should be developed for businesses delivering retrofits, to assure people that providers will deliver a high-quality retrofit.

Defining and researching energy poverty and energy deprivation

8) Overly narrow definitions of energy poverty (e.g. percentage of income) should be avoided in favour of an approach that recognises the intersection of energy poverty, energy deprivation, income inadequacy, housing inadequacy and health effects. The EPAP recognises many of these elements, and the forthcoming ESRI research on defining energy poverty must retain this level of nuance and scope.

9) The ESRI research on defining energy poverty should be firmly grounded in the fact of Ireland's cool temperate maritime climate and the implications of having a longer heating season and a greater incidence of damp (and damp-related health problems).

10) NGO and independent representatives should be included in the energy poverty definition research group to be set up by the ESRI.

11) Greater precedence should be given to excess winter mortality as a key indicator for policy outcomes, alongside other health impacts, not least given that it represents a much greater incidence of premature death than COVID.

12) Analysis should be conducted to demonstrate the value of reducing energy deprivation as a means of reducing ill-health, excess mortality and the consequential demand for health services.

13) Introduce an Energy Poverty Act that defines fuel poverty, sets down ministerial duties, introduces legally bound targets, and sets up an independent energy poverty advisory council. Learning should be drawn from the experience of the Fuel Poverty (Targets, Definition and Strategy) (Scotland) Act 2019.[181]

Defining and responding to at-risk customers

14) When the relevant legislation is brought to the Oireachtas by DECC, the wider definition of vulnerability that includes financial vulnerability should be made a permanent feature not limited to two winter seasons. The term should also be changed from 'vulnerable' to a less negative label that more people can associate themselves with, such as 'at risk'.

15) The issue of self-disconnection needs to be better researched with suppliers required to publish data, and more direct action taken by the CRU to support people to engage with their supplier rather than self-disconnect.

16) More research is needed on the 'poverty premium' that lower income households pay for energy, such as through PAYG meters, and a review is needed to ensure that announcements in the EPAP are being implemented, not least the provision that vulnerable customers should be moved to the most economical tariff and permitted to access billpay regardless of credit record. The CRU needs to research and, if necessary, enforce these provisions.

17) Consideration should be given to the proposal of requiring suppliers to offer a reduced social tariff to customers at risk of energy poverty, which may be lower than their existing lowest tariff (which they are currently required to offer to vulnerable customers).

18) The extent to which digital exclusion and overly hasty, inappropriate digitization compounds energy poverty needs to be researched. Suppliers must be required to provide their lowest tariffs to vulnerable customers even if they are not using the internet and cannot avail of e-billing or other online offerings.

19) The CRU should examine the extent to which the principle of 'responsibilisation' adopted by energy suppliers places an unfair responsibility on customers to respond to their way of doing business, including online, rather than suppliers providing a customer-oriented service that is accessible to all.

20) Special taskforces are needed for communities where there is an exceptionally high rate of energy poverty, such as the rate of 77% recorded by NT-MABS among Travellers in mobile homes pre-crisis.

Building standards and planning

21) The *National Development Plan* should be subject to a climate action proofing exercise, with measures in the plan adjusted to make it compatible with sectoral emissions ceilings.

22) Action on the thermal insulation of private rented accommodation should be fast-tracked, perhaps by frontloading tighter regulations for multi-property landlords first. New-build apartments must not be allowed to regress on insulation or other energy standards. Urgent action should be prioritised for the one in five rental properties believed to have an F or G energy rating. The Repair and Lease Scheme should be extended to HAP tenancies.

23) Reverse recent changes in planning policies and practices that have lowered environmental standards with negative consequences for fuel poverty (e.g. single-aspect, north-facing apartments).

24) Clarity is needed on the recently announced changes to planning, including the renaming of An Bord Pleanála as The Planning Commission/ An Coimisiún Pleanála. There should be multiple NGO representatives on the Commission.

25) Proposed changes to judicial review in planning must align with participatory and procedural rights and fully respond to concerns of environmental organisations, on the basis that these reviews are critically important for transparency, oversight and environmental compliance.

26) More emphasis in policy should be placed on re-purposing and retrofitting empty properties and vacant or derelict buildings for social housing. There should be an inventory of disused and under-used property.

27) The introduction of ZEB standards should be done earlier for social housing, to develop and model best practice in the delivery of these improved standards.

28) More ambitious target should be set for the retrofitting of social housing, including AHB's housing stock, with a minimum standards of B2 to be achieved in all social housing by 2030.

29) More incentives and supports are needed to increase small-scale electricity generation from renewable sources such as wind and solar at household and community level.

Consumer energy pricing

30) Harmful fossil fuel subsidies, which entrench fossil fuel use and dependency, must be phased out in the soonest possible timeframe.

31) Carbon tax must be equitably applied across industries, including aviation fuel, with the opportunity to begin by applying it to private luxury jets as France has proposed.

32) Legislation is needed to guarantee that carbon tax revenue will be ringfenced fund a just transition, in particular social justice measures designed to support at risk households to meet their basic energy needs.

33) The relative importance of carbon tax versus other taxes on fossil fuels should be clearly indicated, and expenditure of carbon tax revenue on social justice issues would benefit from greater public awareness, for example through a labelling scheme.

34) Following work at EU level to decouple renewable electricity prices from oil and gas prices, there is a need to ensure that end-consumer benefit from the lower unit cost as a way of accelerating public adoption of renewable energy.

35) Standing charges on energy bills should be properly and transparently regulated by the CRU. The CRU should examine the feasibility of introducing a cap or abolishing standing charges following recent arbitrary increases by energy suppliers. For example, fixed costs faced by suppliers could instead be recouped through the pricing of units.

36) At risk customers should not be penalised for paying their bills in cash, and any cash surcharges should be prohibited by the CRU.

Supporting NGO engagement with policy

37) More investment through grant aid is needed to build the capacity of NGOs to contribute in this area of policy, alongside a more collaborative approach to the co-design and co-delivery of actions, not just tick-box consultations or annual plenaries.

38) Funding should be provided for joint approaches to emissions reductions coupled with social justice, to enable NGOs from a social inclusion background to collaborate more extensively with environmental NGOs that hold the relevant technical expertise on emissions.

39) The latest Energy Poverty Advisory Group does not include any NGO representatives. At least three NGO representatives should be members of the Group, alongside independent experts.

Governance

40) Just transition, energy deprivation and reducing residential emissions should be topics addressed by national social dialogue involving the community and voluntary pillar and the environmental pillar alongside employers and trade unions.

41) Public Participation Networks and Sustainable Development Councils should have a greater remit to work on just transition issues including energy deprivation.

42) A Just Transition Commission should be established to give greater public awareness to the state's commitment to integrating social justice with climate action.

43) Government, at local as well as national level, should be more willing to solve "small things", such as allowing balcony drying of laundry in apartments, as simple measures that nonetheless contribute to the achievement of climate targets and reduced poverty.

44) There needs to be serious consideration of how departments, agencies or regulators can be "captured" or overly influenced by the position of state enterprises and the lobbying efforts of well-funded industries. More transparent analysis of the policy making process is needed to ensure confidence that decisions are being made in the public interest. For example, landlord prerogatives appear to be valued more than tenant health.

45) The role and level of interventions by the CRU and other relevant public bodies need to be reviewed and updated, to ensure that it is optimally supporting the aims of emissions reductions and energy poverty reduction.

46) Community ownership models should be encouraged in relation to the governance of micro-generation of electricity.

Income supplements

47) Core welfare rates need to increase significantly (at least by €20) and be benchmarked and indexed against the cost of living.

48) More consideration should be given to redesigning the Fuel Allowance income supplement not just expanding eligibility. For example, a year-round payment delinked from fuel type, potentially a tiered payment and one with eligibility based on BER as well as household income.[182] Restrictive household composition eligibility or a requirement to be in receipt of qualifying payments should be removed for the lowest income households, including low paid workers many of whom are migrants.

49) The special energy requirements of people with certain illnesses or disabilities, or who require significant levels of electricity for medical devices, should be addressed through a reworking and expansion of the existing Heating Supplement under the SWA into a new Medical Energy Supplement, which should also replace the payments made by HSE CHO 9 for medical device users and extend them nationwide. The purpose of this payment would be to ensure that everyone on low incomes can afford to operate medical devices necessary to maintain their health.

Annex 1: Interview Questions

- Could you outline to me your knowledge and background in fuel poverty issues, be that from a social justice or energy efficiency perspective? (or both). What is your involvement or remit in the area?
- What is your understanding of the causes and consequences of energy poverty, especially in the past few months? Do you have a periodisation of its emergence and evolution as an issue? Those most vulnerable from a social and energy point of view?
- As you see it, what action or response has it prompted from government, its agencies and voluntary organizations?
- How would you characterise the government's response, rating it for effectiveness and impact? What are its strengths and weaknesses? Any particular policy documents to which you would draw my attention as more or less influential and effective?
- For the future (short, medium and long-term) what do you see are the best, most impactful policy options to be followed, or conversely, avoided? Which best address identified weaknesses in government policy?
- What delivery and implementation systems should be added (or removed?), modified and adapted? Should the influence and balance of the institutional actors be changed and how? What changes should be made to implementation mechanisms in their scope, role, method, prominence and operation?

Annex 2: Interviewees and correspondents

Thank you to everyone who participated in an interview or submitted information to the researchers, including:

- **Aileen O'Reilly,** ALONE
- **Anne Marie O'Reilly,** Threshold
- **Aoife Foley,** National Traveller MABS
- **Aoife Foley,** Queen's University Belfast
- **Aoife Ní Lochlain,** Irish Environmental Network
- **Brian Marron,** Assistant to Sen. Lynn Boylan
- **Bríd O'Brien,** Irish National Organization of the Unemployed
- **Ciaran Cuffe** MEP
- **Claudia Hihetah,** Research Centre for Energy, Climate and Marine, UCC
- **Clodagh Daly,** Community Law and Mediation
- **Dáithí Downey,** Dublin City Council
- **Eileen O'Connor,** Department of the Environment and Climate Change
- **Fleachta Phelan,** Disability Federation of Ireland
- **Gwen Harris,** MABS Blanchardstown
- **Issy Petrie,** Society of St Vincent de Paul
- **Karen Cieselski,** Irish Environmental Network
- **Kevin O'Rourke,** Marchena
- **Lauren Minion,** Peter McVerry Trust
- **Louise Lennon,** Irish Rural Link
- **Marion Jammet,** Irish Green Building Council
- **Michelle Murphy**, Social Justice Ireland
- **Niall Farrell,** Economic and Social Research Institute
- **Niamh Kelly,** One Family
- **Nicola Fox,** MABS Blanchardstown
- **Olive McCarthy,** University College Cork
- **Paul Ginnell,** European Anti Poverty Network
- **Philip Jones,** spatial planner (retired)
- **Sabrina Dekker,** Dublin City Council
- **Sadhbh O'Neill,** environmental expert
- **Sean Moynihan,** ALONE
- **Senator Lynn Boylan**
- **Susan Vickers,** Clúid

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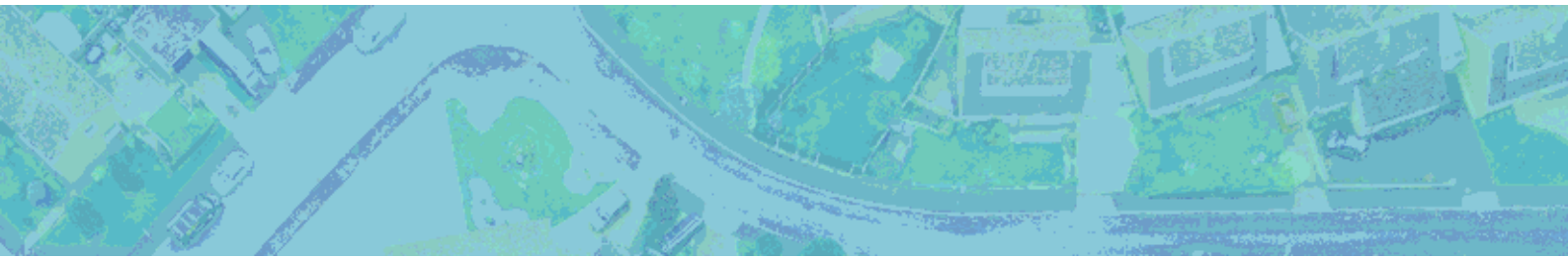

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