



## Joint Submission to the Consultation on the Revised Energy Poverty Action Plan 2024

15 May 2024

The organisations listed above welcome the opportunity to make a submission to the revised Energy Poverty Action Plan. We consider that Ireland's policy on energy poverty to date has been characterised by a lack of ambition and weak governance structures. It is now vital that the Government introduces an ambitious, new Energy Poverty Action Plan that sets out measurable, time-bound targets to eradicate energy poverty and includes a clear pathway to address the structural issues underpinning it.

This plan is of particular importance in the context of a just transition away from fossil fuels and ensuring that no one is left behind as Ireland reduces emissions by 51% by 2030. To ensure that everyone can access the benefits of clean, affordable energy and warm, energy efficient homes, energy poverty must be proactively eradicated alongside measures to reduce emissions in accordance with Ireland's carbon budget programme.

The organisations listed above call on the Government to develop a new energy poverty action plan that abides by the below overarching joint principles.

This submission subsequently includes a list of separate recommendations from certain individual organisations in response to the consultation questions.

## **Overarching Joint Principles for a New Energy Poverty Action Plan**

1. The Government should set out a stated overarching vision for this plan, such as by 2026 no person in Ireland will go without the basic energy they need, regardless of income, home ownership status, age, disability or health status, location, or type of housing.
2. This plan must fully align with and reinforce the government's legal obligation to reduce carbon emissions by 51% by 2030 and associated carbon budgets and sector emissions ceilings. Climate action, such as home retrofitting, must prioritise those most in need. It also must not further widen already-existing inequalities. A climate justice approach that ensures no one is left behind must be at the heart of both emissions reductions and addressing energy deprivation. The burdens and benefits of transitioning to a fossil fuel-free society must be shared equitably while safeguarding the rights of the most vulnerable in society.
3. Energy poverty is not a one-off problem as a result of the energy crisis, and long-term solutions to address the structural causes of energy poverty must be prioritised over one-off, untargeted policies such as the energy credit. This plan must set out a strategy to identify and target households in energy poverty and permanently address inadequate below poverty-line incomes, home energy inefficiency, and high energy costs. It should have a particular focus on groups most at-risk of energy poverty (listed in section 2 below) and prioritise energy efficiency measures and renewable heat in order to reduce reliance on fossil fuel heating for these groups.
4. The EU definition of energy poverty should be transposed well in advance of the October 2025 deadline and, in the interim, agreed indicators and targets that are enforceable, measurable and time-bound to reduce energy deprivation must be set and reported on

from 2024 onwards.<sup>1</sup> These interim indicators should include SILC statistics on energy deprivation, home BER data, data from energy providers, excess winter mortality, and respiratory illnesses.

5. Energy poverty is a complex issue that cuts across all government departments, and this plan and its targets must be placed on a statutory footing to ensure a whole-of-government approach. This would firstly serve to clarify the responsibilities and roles of different government departments, local authorities and other agencies and public bodies involved in addressing energy poverty. It would secondly establish that efforts to address energy poverty are not merely aspirational but enforceable. The current absence of legal safeguards undermines accountability and long-term political commitment towards the eradication of energy poverty.
6. Given the disproportionate impact of energy poverty on the most vulnerable and marginalised in our society, a rights-based approach to addressing energy poverty is vital. This means ensuring perspectives and interests of people most impacted by energy deprivation is taken into account at every step of the action plan development, implementation, and reviewing stages. The Energy Poverty Steering Group must be expanded to include civil society representatives and those with lived experience of energy deprivation.
7. To ensure that a statutory Energy Poverty Action Plan is effectively evaluated for its compatibility with equality and human rights principles, the Government should consult the Irish Human Rights and Equality Commission to examine the Energy Poverty Action Plan to “report its views on any implications for human rights or equality”, in accordance with s10(2)(c) of the Human Rights and Equality Act.

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<sup>1</sup> In accordance with the [recommendations](#) of the European Commission, Ireland’s National Energy and Climate Plan (‘NECP’) must “Indicate a specific measurable reduction target for energy poverty as required by Regulation (EU) 2018/1999.” As Ireland’s NECP cites the existing Energy Poverty Action Plan, the EPAP must be updated to include a quantifiable target to reduce energy poverty. This will ensure alignment between the NECP and the Energy Poverty Action Plan, and consistency with Regulation (EU) 2018/1999.

## Responses to Consultation Questions

This is a collective submission based on inputs from the signatory organisations. Responses to the consultation questions below include separate recommendations from certain organisations. Each individual proposal does not necessarily represent the position of every signatory organisation, rather it reflects a set of concerns from civil society on energy poverty, and various possible solutions and action areas. This list of proposals should be read in conjunction with individual submissions from the respective organisations.

### Section 1: Implementation of Legal Framework

- 1. Energy poverty has been defined at the EU level, identifying low income, low energy efficiency and high energy expenditures as the main factors. What other factors would you include in a national definition? Which of these do you think is the most important to include in a national definition?*

The EU definition of energy poverty should be adopted into national law well in advance of the October 2025 transposition deadline set out in Article 36 of the revised Energy Efficiency Directive<sup>2</sup> and, in the interim, agreed indicators and targets that are enforceable, measurable and time-bound to reduce energy deprivation must be set and reported on from 2024 onwards. These interim indicators should include SILC statistics on energy deprivation, home BER data, data from energy providers, excess winter mortality, and respiratory illnesses.

Another key indicator is the use of material deprivation in identifying energy poverty. The primary focus of the Survey on Income and Living Conditions (SILC) is the collection of information on the income and living conditions of diverse types of households in Ireland, to derive indicators on poverty, deprivation, and social exclusion. The main variables of the data are households, individuals' income, and several key national poverty indicators. For example, the At Risk of Poverty Rate, Enforced Deprivation Rate and Consistent Poverty Rate. The BER and age of property should also be measured.

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[https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AJOL\\_2023\\_231\\_R\\_0001&qid=1695186598766#nr\\*1-L\\_2023231EN.01000101-E0050](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AJOL_2023_231_R_0001&qid=1695186598766#nr*1-L_2023231EN.01000101-E0050)

The European Commission's recommendation on energy poverty notes that "the situation of a household can be further influenced by geographic and climate factors, household characteristics, gender, health, and specific household energy and transportation needs. As such, households with higher energy needs, which include families with children, persons with disabilities and older persons, are also more susceptible to energy poverty and to its effects. Women, and in particular those who are single parents and older women, are also particularly affected by energy poverty due to structural inequalities in income distribution, socioeconomic status and the gender care gap."<sup>3</sup> We particularly welcome the inclusion of socioeconomic status in the EU's definition and this should be highlighted in Ireland's national definition.

These factors highlighted by the EU impact significantly on vulnerable communities, including many older people, in particular those older people dependent mainly on the state pension, older women (many of whom have a lower level of state pension), older people living alone, those in rented accommodation and those aged over 75.

## **Section 2: Meeting the Cost of Energy**

- 1. What barriers do you believe are preventing customers from accessing affordable and reliable energy services?*
- 2. Which groups do you consider have not received enough support, up to now?*

One of the most fundamental barriers preventing customers from accessing energy services is a lack of sufficient income. As publications and analysis from the MESL Research Centre, Social Justice Ireland and EAPN show regularly, as does the annual SILC data, many people in Ireland who live on low and fixed incomes, including in particular those who rely on our social protection system to survive, live on below poverty income levels. Those incomes have not kept pace with inflation in recent years leading to a real term reduction in people's spending power. The Fuel Allowance has also been eroded in recent years. Until Ireland supports all people with an above the poverty line income, energy poverty will continue.

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<sup>3</sup> [https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L\\_202302407](https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202302407)

One of the groups that have not received enough support is renters in the private rental market. While we recognise that there is support available to improve the efficiency of their rental properties. These include the National Home Energy Upgrade Scheme, the Better Energy Homes Scheme and grants for attic and cavity wall insulation, the issue is lack of uptake of these schemes by private rental landlords. A key barrier to retrofitting the private rental sector and thus the continuation of energy poverty in these sectors, is the so-called split-incentive – also known as the tenant-landlord dilemma. It captures a situation whereby landlords do not gain any direct advantage from improvements in energy efficiency in the property, while the tenants benefit from improved comfort and lower energy costs<sup>4</sup>. This dilemma can hinder technical potential.

Another group who have not received enough support are Travellers living in mobile homes, many of whom are local authority tenants and have had trailers supplied to them by the council or through the trailer loan scheme. Many do not have individual MPRNS, do not know who their energy supplier is beyond the local authority and have no access to statements of usage. Despite being home owners (Travellers are required to purchase their own trailers) they have no access to any energy upgrade supports or grants<sup>5</sup>. There are no systems similar to the BER to let them know if the unit they are buying is energy efficient, there is a lack of availability in Ireland of units that conform to BS 3632:2023, which is the standard for energy efficient units suitable for year round living. Due to the current accommodation and energy/cost of living crises many have no option but to live in substandard trailers which are leading people further into energy poverty; in 2019, 77% of Travellers were living in energy poverty<sup>6</sup>. Living in substandard energy poor trailers have knock on negative effects on mental and physical health and increase social deprivation and isolation for an already marginalised and excluded group.

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<sup>4</sup> Shove, E. (1998) 'Gaps, barriers and conceptual chasms: theories of technology transfer and energy in buildings', *Energy Policy*, 26(15), pp. 1105–1112. Available at:

[https://doi.org/10.1016/S03014215\(98\)00065-2](https://doi.org/10.1016/S03014215(98)00065-2)

Bird, S. and Hernández, D. (2012) 'Policy options for the split incentive: Increasing energy efficiency for low-income renters', *Energy Policy*, 48, pp. 506–514. Available at:

<https://doi.org/10.1016/j.enpol.2012.05.053>.

<sup>5</sup> Ehimen, Ehiازه, Esseling, Charlotte, Kearns, Michelle, Foley, Aoife, Research on the Energy Efficiency of Mobile Homes, 2022, available from

<https://www.ntmabs.org/publications/education/2022/mobile-homes-energy-efficiency-report-final-version-oct2022.pdf>

<sup>6</sup> Stamp, Stuart, Kearns, Michelle, Accommodating Ethnicity, 2019 available from

<https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

People living with serious illness can see a reduction in income while also experiencing additional expenses due to illness and can be at risk of energy hardship. For example, in response to a survey, people diagnosed with cancer reported a reduced income of on average €1,500 per month and increased expenses due to illness of over €700 per month.<sup>7</sup> Half of people affected by cancer reported additional heating and electricity bills as a result of their diagnosis.<sup>8</sup> A recent report focusing on people with a life-limiting cancer diagnosis showed that many people receiving palliative care in the home and their carers spend more time at home, that they feel the cold more and that many reported living in homes which were poorly insulated. Energy upgrade costs were reported to be high, and many people were unaware of energy hardship interventions. As part of the same research, palliative home care nurses reported seeing issues such as damp, mould and condensation in homes they visited and that people they cared for and their families initiated conversations about energy hardship.<sup>9</sup>

Disabled people also are more likely to live in energy poverty. The 2021 Indecon report on the extra Cost of Disability shows that disabled people:

- spend 10% more on energy costs,
- are more likely to be in arrears on utility bills, and
- are more likely to be unable to afford to keep their home adequately warm.

The above was based on CSO figures from 2003/2007-2017. More recently, 2023 SILC energy deprivation indicators show that 27.7% of people unable to work due to long-standing health conditions went without heat during the last year, as compared to a national average of 10.8%. Equally, while 4.5% of retired people and 5% of employed people were unable to afford to keep their home adequately warm in 2023, 16.1% of those unable to work due to long-standing health problems experienced this energy deprivation.

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<sup>7</sup> Irish Cancer Society. 2019. "The Real Cost of Cancer. Research conducted by Kantar 2019." Available [here:www.cancer.ie/sites/default/files/2020-01/Real%20Cost%20of%20Cancer%202019%20report.pdf](http://www.cancer.ie/sites/default/files/2020-01/Real%20Cost%20of%20Cancer%202019%20report.pdf)

<sup>8</sup> Irish Cancer Society. 2019. "The Real Cost of Cancer. Research conducted by Kantar 2019." Available [here:www.cancer.ie/sites/default/files/2020-01/Real%20Cost%20of%20Cancer%202019%20report.pdf](http://www.cancer.ie/sites/default/files/2020-01/Real%20Cost%20of%20Cancer%202019%20report.pdf)

<sup>9</sup> Denieffe, S. et al. 2024. "Energy Hardship for People with Palliative Care Needs at Home: Understanding Issues and Promoting Actions. Research Report." Available at: [www.cancer.ie/sites/default/files/2024-02/Energy-Hardship-and-Palliative-Care-Research-Report.pdf](http://www.cancer.ie/sites/default/files/2024-02/Energy-Hardship-and-Palliative-Care-Research-Report.pdf)

A substantial portion of households across the country falls just above the thresholds that are in place for the SEAI Fully Funded Energy upgrade. However, due to a lack of disposable income, oftentimes they cannot afford to undertake any deep renovation projects. Even with the help of all available grants and One Stop Shop services, they will struggle to find the funds to improve the energy rating of their home. Single measures supported by the SEAI will not allow for a deep renovation to occur either as they are not currently linked to a clear ambitious energy renovation plan (e.g., a Renovation Passport).

While many of the groups listed above have received some support, the support has not been sufficient either to bridge the gap of rising prices and low and fixed incomes, nor have state resources been sufficiently targeted at those most at risk of energy poverty.

- 3. In the areas of energy prices, meeting the cost of energy and consumer protection, what further actions do you think could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.*

Many of the organisations listed above have recommended the following actions to alleviate energy poverty:

- Eligibility for the Fuel Allowance should be expanded by including those receiving Working Family Payment, removing the waiting period for those on Jobseekers' Allowance, expanding eligibility to cover the specific living arrangements of Traveller families, and making it available to people on modest incomes in poorly insulated homes.
- The introduction of an Energy Guarantee Scheme should be explored for people in poorly insulated homes and those on low incomes, including in particular the groups known to be more at risk of energy poverty. This payment should be indexed to the current cost of energy required to keep a person's home warm based on a set quantity of units, depending on need (kWh).<sup>10</sup>
- A cost-benefit analysis should be conducted on the introduction of a system of social tariffs.<sup>11</sup>

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<sup>10</sup> Age Action, 2022. An Energy Guarantee for Older Persons: Policy Brief  
[https://www.ageaction.ie/sites/default/files/age\\_action\\_energy\\_guarantee\\_for\\_older\\_persons.pdf](https://www.ageaction.ie/sites/default/files/age_action_energy_guarantee_for_older_persons.pdf)

<sup>11</sup> <https://www.svp.ie/wp-content/uploads/2023/02/Warm-Safe-Connected-Full-report.pdf>



- Address the key role of income inadequacy in energy poverty among older people by raising the contributory pension to 34% of the average industrial wage.<sup>12</sup>
- Ensure that all social protection payments are above the poverty line and meet the recommendations of the Minimum Essential Standard of Living.<sup>13</sup> Social protection payments should be benchmarked and index linked to keep up with inflation and wage increases
- In recognition of the needs of older people and other low and fixed-income groups, expand price protection so that consumers do not have to rely on switching to maintain affordability. Price protection needs to include Government action to ensure consumers are benefiting from falling wholesale prices; for example, retail costs of electricity are currently four times the wholesale costs.
- Introduce a €40 a week Cost of Disability payment to support disabled people with the extra costs of living with a disability

*4. What gaps do you see in the current Energy Poverty Action Plan? How could we address those gaps in a revised Action Plan?*

The current EPAP is insufficiently focused and targeted on the groups most at risk of poverty. It also lacks measurable targets and future actions. The revised plan should include detailed plans for those groups most at risk of energy poverty, and consider intersectionality also. It should also include measurable annual energy poverty reduction targets (using SILC energy deprivation indicators for now, until the ESRI research is complete), both at a national level, and also for particularly at-risk groups, and outline the actions and inputs that will achieve these targets.

The current plan is lacking in governance structures. Energy poverty is a complex issue that cuts across all government departments, and this plan and its targets must be placed on a statutory footing to ensure a whole-of-government approach. This would firstly serve to clarify the responsibilities and roles of different government departments, local authorities and other agencies and public bodies involved in addressing energy poverty. It would secondly establish

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<sup>12</sup> See the Pension Promise campaign, led by NWC, SIPTU, Age Action and other age sector organisations <https://thepensionpromise.com/>.

<sup>13</sup> <https://www.budgeting.ie/>

that efforts to address energy poverty are not merely aspirational but enforceable. The current absence of legal safeguards undermines accountability and long-term political commitment towards the eradication of energy poverty.

A further gap is the lack of focus on actions to support the private rental sector. In the revised energy poverty plan, there is a need to set a plan for introduction of minimum energy efficiency performance standards in the private rental market. There is no additional cost in terms of grant provision, as there are already generous grants and tax allowances in place. However, landlords are either largely unaware of these or reluctant to avail of them. The Home Renovation Scheme, which ran from 2013 to 2018, was available to landlords. Unfortunately, only 2.6% of properties which benefited from the scheme were registered as rental properties. The central problem is encouraging and engaging with landlords. The Sustainable Energy Authority of Ireland provides a study<sup>14</sup> that stresses capability barriers, opportunity barriers and motivational barriers which need to be further addressed. Recommendations from this report included increasing awareness and normalising uptake through signposting and promotional campaigns.

Threshold set out detailed recommendations in respect of this issue in “Warm Housing for All”<sup>15</sup>, in partnership with the Society of Saint Vincent de Paul<sup>15</sup>. Recommendations are also available from the Minimum Essential Standard of Living Research Centre Working Paper “The Cost of Adequately Heating the Home”<sup>16</sup>

See also below response re Energy Efficiency

5. *Are there specific programs or initiatives from other countries that you think could be effective in reducing energy poverty in Ireland?*
6. *How can smart energy solutions be integrated into the Energy Poverty Action Plan in a way which supports sustainability and environmental considerations?*

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<sup>14</sup> SEAI (2023) Promoting retrofitting among homeowners in Ireland through a behavioural lens - <https://www.seai.ie/publications/Promoting-retrofitting-among-homeowners-in-Ireland-through-a-behavioural-lens.pdf>

<sup>15</sup> Threshold, (2021), Warm Housing for All, <https://threshold.ie/wp-content/uploads/2022/06/warmhousingforall.pdf>.

<sup>16</sup> <https://www.budgeting.ie/publications/the-cost-of-adequately-heating-the-home/>

**Response:**

- Sliding scale of grants and loans to better support the working poor / those just above the free energy upgrade thresholds. Ma prime renov' in France or the Dutch model, i.e., 0% interest loan for households under €46k/annum.
- Also, the green doctor initiative in the UK to better communicate/engage with tenants (social housing).

### Section 3: Energy Efficiency

1. *How can renewable energy solutions be integrated into the Energy Poverty Action Plan in a way which supports sustainability and environmental considerations?*

The Energy Poverty Action Plan must integrate and prioritise measures to reduce reliance on fossil fuel heating for those most at risk. We are concerned that Ireland may end up with a 2-tier energy and heating sector, whereby higher income households are able to take progressive measures to reduce their reliance on expensive fossil gas through investment in energy efficiency, microgeneration and demand response, while lower income households are left to struggle in older buildings, dependent on polluting, precarious and increasingly expensive oil and gas. The Action Plan must therefore:

- Ensure that those at risk of energy poverty are not locked into fossil fuel use, through clear timelines and deadlines for phase out of fossil fuel boilers and connections to the gas network. In particular, an end-date for installation of oil and gas boilers via the Warmer Homes Scheme must be set so as to not lock low income households into long-term fossil fuel use.
- Support the development of a network of independent energy renovation advisors throughout every local authority, as well as community organised support programmes, to directly support households, especially those at risk of energy poverty, in navigating the renovation process by improving accessibility and providing tailored information on grants and energy efficiency upgrades. This service would provide a local, tailored service

to support people to access the financial advice they need, to install 'quick win' measures, and to apply for appropriate retrofitting grants.

- Increase funding for the local authority retrofitting scheme with a view to ensuring all social housing reaches a minimum B2 BER by 2030.
- Review and update SEAI's overall mandate to ensure a stronger focus is placed on aiding vulnerable households and taking a more holistic approach to energy upgrades.<sup>17</sup> This is to guarantee fairness and make the most of retrofit funding.
- Support meaningful implementation of national heating (and cooling plans) under the EPBD and EED such that funding for the heat transition prioritises deprived and marginalised groups.
- Increase funding for energy renovation of social housing & AHBs to improve living conditions for households most at-risk of energy poverty and reduce reliance on fossil fuels.
- Review funding mechanisms to address energy poverty ensuring they target those who need it most, include renewable energy technologies, and are adaptable to the needs of energy-poor households.

Many of these recommendations are addressed in further detail in Friends of the Earth's recent research report produced by the Irish Green Building Council.<sup>18</sup>

Further measures include:

- Review funding mechanisms to address energy poverty on a regular basis to ensure renewable technologies and innovative technologies that support both carbon and financial savings are eligible.
- Further support the installation of renewable technologies within the social housing stock through an acceleration of the roll out of innovative approaches such as Energy Cloud to all social housing providers. It is also important to consider extending the new

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<sup>17</sup> See Friends of the Earth (2024) Bridging the Gap Between Energy Poverty and Energy Renovation <https://www.friendsoftheearth.ie/news/research-by-friends-of-the-earth-the-irish-green-building-cou/>

<sup>18</sup> See Friends of the Earth (2024) Bridging the Gap Between Energy Poverty and Energy Renovation <https://www.friendsoftheearth.ie/news/research-by-friends-of-the-earth-the-irish-green-building-cou/>

requirement to install solar PV in existing public buildings under the revision of the EPBD to all social housing stock.

- Funding for renewable solutions (such as solar PV) should be increased, and roll-out accelerated under the SEAI Fully Funded Energy Upgrade Scheme.
- Pilot a dedicated retrofitting programme for rural households solely relying on solid fuel heating systems.

2. *The Government is acutely aware of the need to balance the support available under the Warmer Homes scheme and the waiting times for that support. Do you think the scheme could be adapted in any way to better target the support so that we can achieve that balance? Are the current eligibility criteria still appropriate? Please provide references to any relevant material that would support your response.*

The below actions are recommended to expand and better target the Warmer Homes scheme to those most in-need:

- The SEAI are currently prioritising households based on BER and the age of the property, however, more must be done to further prioritise households on low-incomes; e.g. based on annual income (P60 form).
- The criteria of the Warmer Homes Scheme should be reviewed on a regular basis to ensure it provides additionality and better targets the most vulnerable households in society. The eligibility criteria for the Warmer Homes scheme should be expanded to include properties in the private rented sector if the tenant is receiving the Housing Assistance Payment. However, eligibility should be contingent on the landlord providing a long-term lease (5+ years) to the tenant.
- The introduction of a sliding scale on the rate of grants based on income as part of a Warmer Homes Plus scheme could help to further address these long waiting lists.
- Expand the number of energy efficiency measures currently under the 80% grant to allow more people to avail of partial energy upgrades, and fully fund the renovation passports to be introduced under the EPBD 2024 Recast as part of this process (at least for households at risk of energy poverty). This is key to ensure that these individual measures lead over time to highly energy efficient, comfortable homes for all.
- Address the serious health impacts of inadequate heat on older people and others with respiratory and other chronic health conditions (which lead to excess winter deaths) by

publishing the results of the review of the Warmth and Wellbeing Scheme, and expanding this scheme if the review shows a positive impact.

3. *The Government has put in place several supports for landlords (including a range of grants, a tax incentive, and the forthcoming home energy upgrade loan scheme) to upgrade the efficiency of their rented properties. Are there other measures (acknowledging the challenges facing the housing sector) that the Government could take that you think would further support upgrades in the private rented sector? Please provide references to any relevant material that would support your response.*

- Commence preparation of a tailored Retrofit Plan for the private rented sector with clear milestones, targets and funding, as required under the EPBD Recast 2024.
- The Warmer Homes scheme (free energy upgrades) should be expanded to include properties in the private rented sector if the tenant is receiving the Housing Assistance Payment. However, eligibility should be contingent on the landlord providing a long-term lease (5+ years) to the tenant.
- The current trailer loan scheme for Travellers should be replaced with a new trailer rental scheme to ensure mobile homes are built to a residential standard in terms of heating and insulation, with a rating system similar to BER being adopted.
- Extend access to free BER assessments to older people and others on low incomes who may not meet the current requirements for Fuel Allowance.
- Introduction of Minimum Energy Performance Standards (MEPS) in the private rental sector. The introduction of MEPS should be flagged well in advance and introduced alongside technical and financial support to support small landlords and tenants, as well as explicit protections for tenants against the threat of “renovictions”.
- Pilot a mechanism similar to the Repair and Leasing Scheme to support energy renovation of rented properties. This would provide an incentive, particularly to small landlords that may not have the financial or technical capacity to retrofit their properties.

## **Section 4: Research**

1. *What best practice regarding research on energy poverty (e.g. dissemination, public engagement, mechanisms for continuity) should we consider?*
  2. *Besides the Economic Social Research Institute's (ESRI) research programme into Energy Poverty, which generally covers measurement and targeting, what other areas do you think should be investigated/researched?*
  3. *The ESRI will provide metrics to measure the number of people experiencing energy poverty and the impact of it on them. In your view, what specific indicators will be helpful in monitoring the success of the Energy Poverty Action Plan over time?*
- Indicators to monitor success of the plan should include SILC statistics on energy deprivation, home BER data, data from energy providers, excess winter mortality, and respiratory illnesses.
  - There remains a lack of research on the split-incentive in Ireland. The Sustainable Energy Authority of Ireland have produced a study<sup>19</sup> on this and have identified behavioural barriers to retrofitting the home. A behavioural model was used to examine behavioural change which stated that behaviour adoption by individuals must have sufficient capability, opportunity, and motivation. These behaviours in regard to retrofitting need to be further researched.
  - The Department should also consider the role of community groups and sports clubs to improve the rollout of energy efficiency measures for those most in need. In 2023 Friends of the Earth supported Bohemians Football Club to lead consultation with Bohemians members and fans, aiming to understand their diverse perspectives on retrofitting and energy efficiency. This also involved meeting with expert stakeholders including the local Credit Union, SEAI, industry professionals and Codema to co-develop community-specific solutions to enhance energy efficiency initiatives, such as community-led home improvements, and trust-building with local contractors (see associated research report).<sup>20</sup>

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<sup>19</sup> SEAI (2023) Promoting retrofitting among homeowners in Ireland through a behavioural lens - <https://www.seai.ie/publications/Promoting-retrofitting-among-homeowners-in-Ireland-through-a-behavioural-lens.pdf>

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<https://www.friendsoftheearth.ie/news/bohemians-fc-and-friends-of-the-earth-launch-plan-to-level-t/>

## Section 5: Communications and Governance

1. *How can we better communicate our work in the area of Energy Poverty to all stakeholders?*
  2. *What suggestions do you have for ensuring the inclusion and representation of diverse voices in the development and implementation of the Energy Poverty Action Plan?*
- Given the disproportionate impact of energy poverty on the most vulnerable and marginalised in our society, a rights-based approach to addressing energy poverty is vital. This means ensuring perspectives and interests of people most impacted by energy deprivation is taken into account at every step of the action plan development, implementation, and reviewing stages. The Department must ensure that the plan is afforded appropriate and inclusive public consultation and must ensure to reach those with lived experience of energy poverty.
  - We recommend the consultation and collaboration with relevant organisations that work across anti-poverty, socio-economic, housing, Roma, Traveller, disability organisations, older people, health, community groups, social justice and human rights bodies, and to include such bodies on the Energy Poverty Advisory Group, to ensure the plan is fully poverty and equality-proofed.
  - The Energy Poverty Steering Group must be expanded to include civil society representatives and those with lived experience of energy deprivation.<sup>21</sup>

## Section 6: Policy design

1. *In your view, how can we integrate other policies (e.g. housing, energy market regulation, income tax and income support) in our Plan to tackle Energy Poverty?*
- In accordance with the recommendations of the European Commission, Ireland's National Energy and Climate Plan ('NECP') must "Indicate a specific measurable reduction target for energy poverty as required by Regulation (EU) 2018/1999." As

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<sup>21</sup> See Friends of the Earth (2023) 'Still Left Out in the Cold'  
[https://www.friendsoftheearth.ie/assets/files/pdf/still\\_left\\_out\\_in\\_the\\_cold\\_-\\_full\\_report.pdf](https://www.friendsoftheearth.ie/assets/files/pdf/still_left_out_in_the_cold_-_full_report.pdf)



Ireland's NECP cites the existing Energy Poverty Action Plan, the EPAP must be updated to include a quantifiable target to reduce energy poverty. This will ensure alignment between the NECP and the Energy Poverty Action Plan, and consistency with Regulation (EU) 2018/1999.

- Place the new Energy Poverty Action Plan on statutory footing to ensure policy coherence and a whole-of-government approach. The Strategy will require cooperation in particular between the Department of Environment, Climate and Communications; Department of Finance; the Department of Social Protection; the Department of Health; Department of Rural and Community Development; and the Department of Housing, Local Government and Heritage.
- Recommendation 24 of the EU Commission Recommendation 2023/2407 is important to take into consideration as it recommends that member states *“Design specific energy efficiency support schemes targeting households affected by energy poverty. When setting up these schemes, Member States should keep in mind that these households cannot afford paying upfront costs of renovation although they would be reimbursed afterwards, and that they do not benefit from tax-related bonuses and deductions as their income tax is minimal.”*
- Introduction of minimum energy performance standards for rental buildings.
- Review the minimum standards for rented housing to cover Indoor Environmental Quality (IEQ) standards.