

Energy Poverty Action Plan Consultation

Department of the Environment,
Climate and Communications
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Introduction

On the back of the pandemic, we are now facing a winter in which many households will find the rising cost of living simply impossible to meet.

This burden is not spread evenly, and this Energy Poverty Action Plan must be focused on protecting those at worst risk of harm. Governance of the plan must be ambitious on all fronts, from taking action within the energy market to creating new markets for retrofitting, and joining up different areas of action so that people receive wraparound support. Ultimately, we must use this moment of energy crisis and climate action to end energy poverty this decade.

Each year, SVP supports thousands of households struggling with the cost of energy. This presents in different ways, from relying on solid fuel assistance to cover weeks when the oil tank is empty in winter, to self-disconnecting from prepayment meters when there is no more money to top up for the rest of the week. SVP members see the impact of substandard housing on tenants forced to live in damp homes, where parents worry about the health impacts on their children, or people with poor health or living with a disability have to pay extortionate amounts to maintain an adequate level of heat to stay well.

SVP also see the connections between energy poverty, having to cut back and compromise on food, rural isolation due to the cost of transport, and the impact of having to make ends meet on an inadequate income.

Affordable energy is an essential requirement for a healthy and decent standard of living. Warmth, light, hot water and the ability to cook a healthy meal all depend on having reliable access to energy. For too many people these needs have not been met this year, and will be even more difficult to meet this coming winter.

The Society of St Vincent de Paul (SVP) welcomes the opportunity to respond to this consultation. We hope that this action plan meets the scale of the challenge presented to us.

Q1. What further action could be taken to alleviate energy poverty through home energy upgrades? Please provide any relevant analysis or research to support your suggestions.

Home energy upgrades are an essential part of ending energy poverty. At the same time retrofitting contributes to climate mitigation and provides employment opportunities.

The Government's target of upgrading 500,000 homes to a BER of B2 or equivalent is rightly ambitious, and we acknowledge the funding trajectory for retrofits targeted at groups on low incomes. This recognises the co-benefits of investing in the energy efficiency of low-income households, which improves the lives of people in energy poverty, provides quality employment opportunity, and responds to carbon reduction imperatives.

It is SVP's belief that this significant national investment must primarily support those at highest risk of the adverse outcomes of poor housing. SVP members regularly see the impact of poor-quality housing on people's lives, leading to health issues, ongoing stress and a financial penalty. We are particularly concerned about tenants who live in substandard accommodation with no options to improve their housing conditions.

There needs to be retrofitting sub-targets for particular groups and cohorts who are at the highest risk of energy poverty to make sure that improvements in energy efficiency are reaching all parts of society, including households in poverty, children in energy poverty, people with ill-health or disabilities, and addressing energy poverty in the Traveller community. We provide further detail below, and will focus on the rented sector in answer to the next question.

Households in poverty

We recognise the additional investment the government has put towards retrofitting grants for low-income households in recent budgets. However, we remain concerned about the ability of eligible, homeowners, households to use these grants, as well as those households still ineligible for support.

As investment in energy efficiency is one of the primary routes to mitigate the regressive nature of carbon tax, it is essential that we are monitoring how much of the target groups it is actually reaching. Otherwise, there are many households paying the tax and not benefiting from the mitigation measures.

The long waiting times in place at the moment mean many households will be without energy efficiency support as we head into a winter with CPI rate of 54% for electricity, gas, and other fuels.¹ As price rises are happening now, while the backlog for free energy upgrade remains

¹ CSO (2022) Consumer Price Index. Available at: <https://www.cso.ie/en/releasesandpublications/er/cpi/consumerpriceindexjuly2022/>

significant, the policy response must also acknowledge that pledging help in the future (while much needed) does not do the same work of mitigating energy costs incurred today.

Amongst those eligible for free upgrades, there are many households who don't know about it or haven't applied. A survey carried out for MABS by UCC found that of the clients interviewed, 59% qualified for free upgrades due to being in receipt of a relevant social welfare payment, but only 9% had actually used the supports, and of those it was mostly for shallow measures such as lagging jackets, light bulbs, and attic insulation.² The research also found that affordability was a significant issue for people deciding whether to invest in energy efficiency, including the comment from one respondent "I want to be energy efficient but cannot afford to be. I am worried about carbon taxes."³

While the sample size of this study means it can't be extrapolated to the population at large, it does reveal there is currently low coverage of energy efficiency take up, even amongst households who would qualify.

Children in energy poverty

Research carried out by SVP in 2019 looked at the impact of energy poverty on children, following the prioritisation of households with children, particularly those headed by one parent, as a target group for energy poverty alleviation measures under the previous Energy Poverty Strategy.⁴ SVP members have had particular concerns about the health impacts of children living in housing with damp and mould for long periods.

The analysis, using data from the Growing up in Ireland Study, found that children living in energy poor households were 1.3 times more likely to have asthma and 1.4 times more likely to have two or more courses of antibiotics in the past twelve months. The findings show that although their causes are inter-related, the effects of energy poverty are distinct from the effects of income poverty. The results also showed when controlling for a range of socio-economic factors that living in the private rental sector (Odds: 2.2) or a rural area (Odds: 1.3) were distinct risk factors for children's exposure to energy poverty. Therefore, this suggests

² UCC (2021) 'ENERGISE: Enhancing the transition to energy citizenship: Connecting households with low disposable incomes.' Available at:

<https://www.ucc.ie/en/media/research/iss21/ENERGISEpolicybriefingpdf.pdf>

³ Ibid.

⁴ SVP (2019) 'Growing up in the cold'. Available at: <https://www.svp.ie/getattachment/2cb10388-e3ca-41ef-9911-a17f252ce09c/Growing-up-in-the-Cold.aspx>

that policy levers to alleviate energy poverty among children will lead to significant health benefits and a reduction in health expenditure in the future.

Unfortunately, this concern amongst SVP members persists. In the last year of data almost a third (31.5%) of children living in poverty were living in housing with a leaking roof, damp walls, floors or foundations, or rot in window frames of floor, almost twice the rate (15.5%) of children not in poverty, and almost 7 percentage points higher than the average for children in poverty in EU27 countries (24.6%).

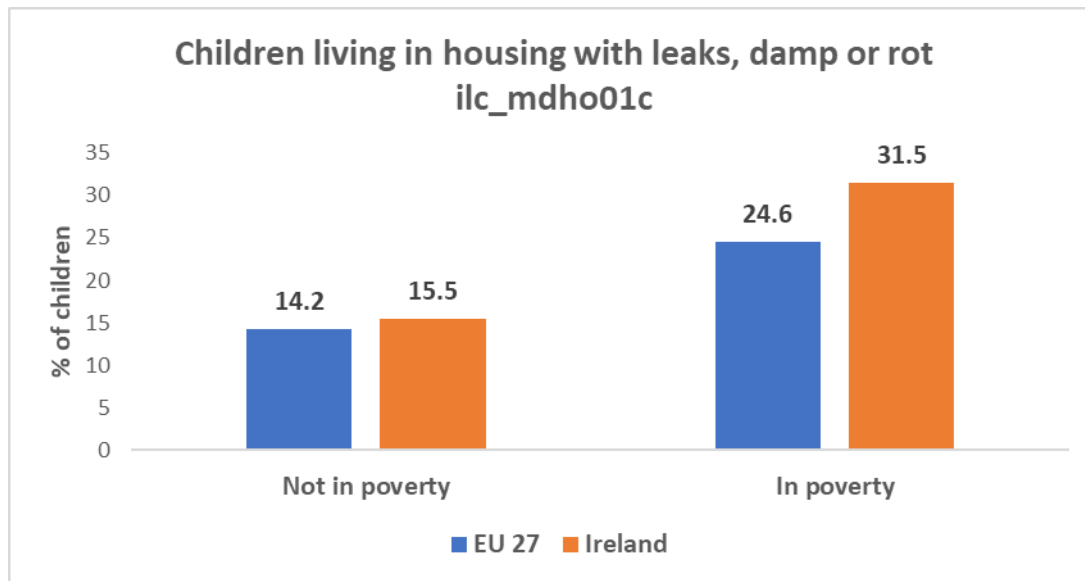


Figure 1: Children living in houses with leaks, damp or rot by poverty status

SVP is concerned that for many of these households, there is still not an adequate strategy to improve the substandard accommodation they are living in. The situation remains that the primary route to free energy upgrades, the Better Energy Warmer Homes scheme, is only open to homeowners, and therefore skews towards take up by older households.⁵ Energy poor households with children are more likely to live in the rental sector. As discussed later on in this submission, the private rental sector currently remains entirely outside of energy-poverty-targeted retrofitting supports and local authority retrofitting targets lack the required ambition.

⁵ SVP (2019) 'Growing up in the cold'. Available at: <https://www.svp.ie/getattachment/2cb10388-e3ca-41ef-9911-a17f252ce09c/Growing-up-in-the-Cold.aspx>

Supports for people with ill-health or disabilities.

People out of work due to ill health or disability have amongst the highest rates of poverty and deprivation in the country. This impacts on their ability to afford adequate warmth. Additionally, many of these households may in fact require warmer homes to maintain their health, or require greater energy use for electrically powered equipment, leading to a double energy burden for this group. In early 2021 SVP commissioned a nationally representative survey which found that 42% people unable to work due to a disability reported cutting back on heating or electricity due to cost⁶. The Disability Federation of Ireland also point out that for many disabled people high energy costs continue year round to use electrically powered equipment, with no abatement in summer.⁷ Indecon's report into the cost of poverty also illustrated the scale of the additional costs that can be incurred, with the average additional heating cost of €828 per year, and additional electricity costs of €635 per year.⁸ These costs were before the price increases we have since experienced.

SVP were disappointed that the Warmth and Wellbeing pilot scheme was not continued. This scheme, which offered free upgrades to people at particular risk of the health impacts of inefficient housing, was a well-targeted measure that received positive feedback, with participants reportedly 'needing fewer GP and hospital visits, fewer prescriptions for antibiotics, as well as increased engagement with other support services in their community'.⁹

As we head into a winter of very high energy prices where people with health conditions that require higher energy use will be disproportionately burdened, having a scheme particularly focused on this group would be the best use of resources. This would sit coherently alongside response 8 of the National Energy Security Framework to '*Introduce a targeted scheme for installation of PV panels for vulnerable customers/households with a budget of €20m*'¹⁰ which recognises the additional energy needs of people with ill-health or disabilities, and make steps towards accounting for the additional inflationary pressure on this group.

⁶ SVP (2021) 'Cutting Back and Falling Behind' Available at: <https://svp.ie/getattachment/a116ab93-1ba9-4f04-b5a2-bbad59dab050/Cutting-Back-and-Falling-Behind-Red-C-Report-March.aspx>

⁷ DFI (2022) 'Submission to the DSP on Budget 2023'. Available at: https://www.disability-federation.ie/assets/files/pdf/dfi_prebudget_submission_to_dsp_for_budget_23_final.pdf

⁸ DSP (2021) 'The Cost of Disability in Ireland – Research report'. Available: <https://www.gov.ie/en/publication/1d84e-the-cost-of-disability-in-ireland-research-report/>

⁹ DECC (2022) 'Strategy to Combat Energy Poverty – Progress Review and Public Consultation'. Available at: <https://www.gov.ie/en/consultation/4e1ac-energy-poverty-strategy-review/>

¹⁰ DECC (2022) 'National Energy Security Framework' Available at: <https://www.gov.ie/en/publication/ea9e4-national-energy-security-framework/>

Free energy upgrades should also be extended to all homeowners in receipt of Disability Allowance, moving beyond the current requirement that eligible households have a child under 7.

Addressing energy poverty in the Traveller Community.

There must be specific provisions to reduce the unacceptably high levels of energy poverty in the Traveller Community. Research by MABS has estimated that the level was 75% in 2019, and yet there are currently no specific supports to upgrade mobile homes and trailers.¹¹

This gap in supports exacerbates deep inequity that results in Travellers living in substandard accommodation and paying extremely high amounts for energy. Addressing the structural causes of energy poverty in the Traveller community must be an essential part of a new energy poverty strategy, and link in with climate and retrofitting programmes. For example, Community Law and Mediation have found that in Local Authorities that offer the Caravan Loans Scheme the payment amounts are not sufficient for a high-quality caravan and so ‘holiday’ or ‘starter’ trailers which are intended for temporary use must be purchased. Poor quality caravans are then much less energy efficient and use significantly more resources including fuel and electricity.¹²

MABS has also previously highlighted that there are problems around recognising multiple households sharing a bay but only able to receive one Fuel Allowance payment.¹³ This year the FA is more essential than ever so this must be immediately addressed.

¹¹ National Traveller MABS (2019) ‘Accommodating Ethnicity: Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers’ Available at:

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

¹² CLM (2020) ‘The Legal Implications and Lived Experiences of the Caravan Loan Scheme’. Available at:

<https://communitylawandmediation.ie/wp-content/uploads/2020/08/The-Legal-Implications-and-Lived-Experiences-of-the-Caravan-Loan-Scheme-FINAL.pdf>

¹³ National Traveller MABS (2019) ‘Accommodating Ethnicity: Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers’ Available at:

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

Q2. What further action could be taken to alleviate energy poverty in the rental sector?

Please provide any relevant analysis or research to support your suggestions.

Social Rent

Ireland has been found to be in violation of its human rights obligations to provide appropriate accommodation to social housing tenants, and the slow rate of improvement in the condition of local authority housing has been criticised by the European Committee of Social Rights Findings as recently as 2021:¹⁴

‘The Committee further notes unsatisfactory management and maintenance issues in housing conditions for tenants, who do not often have safe houses. Tenants report long waiting periods for basic repairs and poor housing conditions for number of local authority households. The Commission identified evidence provided by tenants, architects and engineers on persistent issues with mould, dampness and sewage invasions, rat infestations, etc.’¹⁵

In the same report, the Irish Government has been criticised for failing in its obligations to provide appropriate and adequate accommodation for the Traveller community. This is a factor in very high rates of energy poverty as discussed in the previous section of this submission.

The combination of breaching the human rights of tenants, and Ireland’s climate targets, means it is imperative that the state commits to upgrading all local authority owned accommodation to an adequate standard within a specified time frame. Without this commitment to outcomes – ie. that all housing will be adequate – tenants will fall through the net.

Recent announcements indicate approximately 36,500 social housing units will be retrofitted by 2030, which amounts to approximately a quarter of the total number of households renting from a local authority (143,000 units at the 2016 census count¹⁶).¹⁷ Even if these

¹⁴ IHREC (2022) ‘Council of Europe finds Ireland Remains in Breach of Human Rights Obligations’ Available at: <https://www.ihrec.ie/council-of-europe-finds-ireland-remains-in-breach-of-human-rights-obligations/>

¹⁵ Council of Europe (2021) Follow up to decisions on the merits of collective complaints’ Available at: <https://rm.coe.int/findings-2021-en/1680a5eed8>

¹⁶ CSO (2016) ‘Census of Population 2016 – Profile 1 Housing in Ireland’ Available at: <https://www.cso.ie/en/releasesandpublications/ep/p-cp1hii/cp1hii/tr/>

¹⁷ SVP (2022) ‘The Cost of Surviving’ Available at: <https://svp.ie/getattachment/5ca78a6d-af8a-4f3c-a713-09dcb3da5473/SVP-PBS-2023-The-Cost-of-Surviving.aspx>

targets are reached, much of the LA housing stock remains unaccounted for. This will be apparent in the number of LA tenants still living in energy poverty, and still experiencing the health impacts of living in housing with leaks, damp or rot.

In order to create a truly just transition we need to see a more ambitious target for the deep retrofit of social housing by 2030. This would combine the preventative maintenance needed to satisfy human rights obligations,¹⁸ as well as using the state's full range of powers to bring down carbon emissions from property that it owns.

The number of local authority homes being retrofitted each year must be increased, with 10% of the LA target upgraded next year, and the ambition to reach minimum BER levels for all LA housing. The government must lead by example. This would guarantee a minimum level of protection for those on the lowest incomes from the impacts of energy costs and energy poverty, as well as being a sound investment in state-owned infrastructure.¹⁹

Private rent

"Housing for All", the new housing strategy for Ireland until 2030, includes a commitment by Government to: 'Implement Minimum BER standards, where feasible, for private rental properties, commencing in 2025' (Action 2.14). In 2021 SVP and Threshold collaborated on a report called 'Warm Housing for all? Strategies for improving energy efficiency in the private rented sector' which set out 15 recommendations for government.²⁰ A full list of these recommendations are included at the end of this submission. ⁱ

Both SVP and Threshold see first-hand the impact of poor housing standards and cold and damp homes on tenants. Tenants face the consequences by paying over the odds for their energy bills alongside the impacts of energy poverty that include physical and mental health impacts. The recommendations in the joint report dealt with current energy efficiency standards; opportunities and barriers to make progress in the PRS; financing retrofitting in the PRS; and protecting tenants.

¹⁸ As indicated by the Irish Human Rights and Equality Commission in its submission to the European Committee of Social Rights <https://rm.coe.int/findings-2021-en/1680a5eed8>

¹⁹ SVP (2021) 'Submission to the Climate Action Plan' Available at: <https://svp.ie/getattachment/d74cc95b-767d-46bb-8691-9df401f0d139/SVP-Submission-to-Climate-Action-Pan-2021.aspx>

²⁰ SVP and Threshold (2021) 'Warm Housing for All? Strategies for improving energy efficiency in the PRS' Available at: <https://svp.ie/getattachment/b950a94b-f443-4982-a317-eee4afc7ebd8/Warm-housing-for-all-Strategies-for-improving-ene.aspx>

Without taking direct action to overcome the split incentive for tenants at highest risk of energy poverty in the sector, the report warned that there will be increasing inequality in housing standards with the lowest income tenants left with the worst housing conditions. We already see that tenants in receipt of HAP are least likely to live in a highly energy efficient home (Ber of A or B).²¹

Key points and priorities from the report include:

- 1) Providing a comprehensive, long-term plan with clear milestones and funding would enable landlords to plan ahead, learn about changing requirements, and arrange financing. (SVP notes with disappointment that since the publication of the upcoming minimum BER regulations in ‘Housing for All – a New Housing Plan for Ireland’ almost a year ago, there have been no further details provided to enable the sector to prepare.)
- 2) To encourage early uptake of energy improvement measures, landlords whose properties may not require extensive work to reach BER level B2 should be encouraged to invest now in some ‘easy win’ measures. This can be done through a targeted awareness raising campaign.
- 3) As of February 2021, 86% of landlords owned one or two properties accounting for 53% of registered rental properties.²² Smaller landlords may have more limited time, knowledge and awareness of how to access support around retrofitting. These landlords would benefit from a streamlined and “private-rent ready” One Stop Shop approach.
- 4) The government needs to take action on the announcement in Housing for All to introduce minimum energy efficiency standards by 2025 by making properties in the private rented sector eligible for funding equivalent to the ‘Better Energy Warmer Homes Scheme,’ for low-income tenants and their landlords, based on a tenant receiving the Housing Assistant Payment and having a long term lease.
- 5) Protecting tenants at risk of ‘renovictions’ (eviction due to renovation) must be built into policy from the beginning, including ensuring the Residential Tenancies Board is fully equipped to proactively defend Tenants rights, enabling One Stop Shops to support Landlords to keep tenants in place, providing funding to incentivise Landlords to maintain tenants (as in point 4 above).
- 6) To improve the capacity of local authorities to enforce standards, the report recommended an ‘NCT for housing’ which would be based on certification from approved professionals and allow the integration of fire safety, energy regulations, tax obligations and RTB registration⁴⁸. As well as improving the experience of tenants in the private rented sector, the benefits of this system includes ensuring that state funding (via Housing Assistance Payments) are not subsidising substandard accommodation.

²¹ CSO (2021) ‘The rental sector in Ireland 2021’ Available at: <https://www.cso.ie/en/csolatestnews/pressreleases/2021pressreleases/pressstatementtherentalsectorinireland2021/>

²² Data referenced in the ‘Warm Housing for All?’ report, provided to Threshold on request by the RTB.

Energy Efficiency Obligation Scheme:

In SVP's submission on 'The Redesign of Ireland's Energy Efficiency Obligation Scheme' (April 2021) we called for the redesigned EEOS to include supporting private rented tenants, and in particular tenants on a low income in receipt of HAP.²³

We noted that the UK's 'Energy Company Obligation' scheme allows private tenants to avail of the scheme therefore maximising the numbers of energy poor households who are assisted. Depending on the energy efficiency rating of the property the measures that can be carried out under the scheme are subject to some limitations. (Full details are available at page 41 of the Delivery guidance notes.²⁴) Additionally, in the UK local authorities have the power to make a declaration to energy companies that a particular household should be eligible for grant support. The local authority can declare in writing that a household is living on a low income and is either particularly at risk from the effects of a cold home or is living in housing that cannot be kept warm at a reasonable cost.²⁵ SVP believes this would be a useful system to explore for the Irish context, for example by including tenants in receipt of Housing Assistance Payments.

We recommended that the EEOS eligibility criteria for energy poverty measures is reviewed when there is a wider national strategy in place for retrofitting the private rented sector (which must be a priority for DECC). This plan must include vital tenant protections including the need for long term leases to prevent eviction or rent increases after works are completed. The EEOS could at that point incorporate private tenants in energy poverty into the scheme, as in the UK.

Q3. In the areas of energy prices, meeting the cost of energy and consumer protection, what further action could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.

The new energy poverty action plan must clearly lay out the steps that will be taken to protect low-income households through the coming winter.

²³ SVP (2021) 'Submission to the EEOS 2021' Available at: <https://svp.ie/getattachment/7b5e5816-ee3a-43d1-b1c3-573d1f1616a5/SVP-Submission-to-EEOS-2021.aspx>

²⁴ Ofgem (2018) 'Energy Company Obligation 2018-22 (ECO3) Guidance: Delivery' Available at: https://www.ofgem.gov.uk/system/files/docs/2021/03/eco3_guidance_delivery_v1.6.pdf

²⁵ Details available here: https://www.ofgem.gov.uk/sites/default/files/2021-07/eco3_guidance_delivery_v1.6.pdf

The scale of the crisis must be recognised, and government must commit to proactively supporting households through this period of inflation.

This must be a whole-of-government response: energy poverty stems from an inadequate income, inefficient housing, as well as the cost of energy. Therefore a joined up response is needed from the Department of Environment, Climate and Communications, the Department of Housing, Local Government and Heritage, and the Department of Social Protection.

Research commissioned by SVP from January of this year showed the impacts that had already been felt by many groups due to energy price increases at that date.²⁶ This included cutting back on essential heating and electricity, cutting back on other essentials such as food, and using savings or going into debt to pay bills.

These impacts were disproportionately experienced by those who were unemployed, local authority and private renters, and one parent families. Conversely, retired or working households were found to be more able to make use of constructive responses to price increases such as switching suppliers to make savings or making the home more energy efficient.

This points to lower income households already having depleted their financial resources by January of 2022, leading us to be very concerned about these households' prospects for the coming winter.

To further illustrate this, SILC data from 2021 shows the existing extremely high levels of utility arrears amongst lone parent households in poverty. One parent families are the group we support most often at SVP, and the extremely high rates of utility arrears (47.3%), and risk of being unable to keep the home adequately warm (15.8%) highlight the level of support needed from this Action Plan and from Budget 2023.

²⁶ SVP (2022) 'The Cost of Surviving' Available at: <https://svp.ie/getattachment/5ca78a6d-af8a-4f3c-a713-09dcb3da5473/SVP-PBS-2023-The-Cost-of-Surviving.aspx>

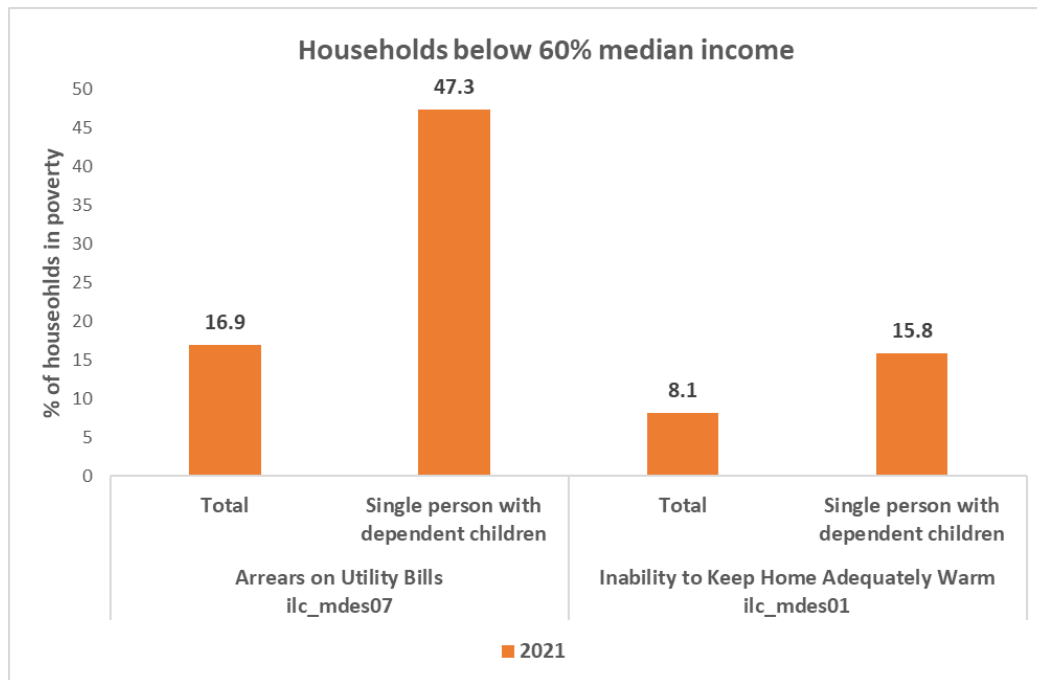


Figure 2: Households in poverty who are in arrears on their utility bills, or unable to keep the home adequately warm.

Taken together, many of the priorities outlined below point towards a lack of coordination in identifying who is most in need of energy support between different government departments, and the energy market. Ensuring the Fuel Allowance reaches all those who need it would provide a flag to suppliers for people on very low incomes. A social tariff would allow measures to be targeted just at consumers who need it the most, and community energy advisors would support households to both manage ongoing energy needs and access the support to reduce their usage through energy efficiency.

Government response:

a. Income Adequacy

At the root of energy poverty is the reality that many people do not have an adequate income to meet their basic needs. This means that households face having to make compromises and decisions over what they will cut back on from week to week, and the reality seen by SVP members is that this means that households may go without sufficient food in order to pay for their energy, or they may go without sufficient energy in order to pay for their food.

The Department of Social Protection, as the department responsible for providing income supports and protecting people from poverty, has a significant role in reducing energy poverty long term, as well as responding to the energy price crisis.

The social welfare system is designed to target support towards the people and households that need it most. Just as during the pandemic the Pandemic Unemployment Payment was deployed swiftly by the department to protect people who had lost their income, DSP is currently well placed to use the existing social welfare infrastructure to support households who are feeling the biggest impact from rising energy prices. This should be through core social welfare payments, which are already targeted to households on the lowest incomes, as well as energy specific payments, and Additional Needs Payments as the discretionary element within the social welfare system.

This support needs to be sustained, rather than provided through once off or ad hoc measures. This provides households with the ability to plan for their energy needs for the season ahead. While the recent additional Fuel Allowance payments were essential and welcome, as we head into winter this year with more foresight, adequacy must be addressed within core payments so households can plan ahead and meet all their needs.

Longer term, there will be a continuing role for DSP in supporting people with energy costs. The Vincentian Partnership for Social Justice has previously shown that while increases in energy efficiency undoubtedly reduce energy requirements, energy efficiency itself is not sufficient to remove the burden of energy costs from a household who is living on inadequate income, stating: 'Even at the highest efficiency level examined, social welfare dependent households tended to remain in energy poverty and all faced inadequate income.'²⁷

b. Fuel Allowance

The Fuel Allowance is the primary route through which Government supports households with their energy bills. This has been shown through additional payments made this year in recognition of the rising cost of energy, and the extension of the payment period during the pandemic as people had to stay at home longer, incurring larger energy bills.

This year the Fuel Allowance must be set at a level that reflects the burden of energy bills on very low-income households, and it must reach all those who need it. Currently shorter-term social welfare recipients and in-work households on the Working Family Payment are not eligible, this means that support via the Fuel Allowance misses many people who need essential support. We therefore recommend the government:

²⁷ VPSJ (2014) 'Minimum Household Energy Need'. Available at: <https://www.svp.ie/getattachment/716d46e2-e390-4fce-8e4e-cc3fb2297f62/Minimum-Household-Energy-Need-VPSJ-Research-report.aspx>

- I. Ensure support for energy costs through the Fuel Allowance is set at an adequate level. Recent years have seen the purchasing power of the Fuel Allowance reduced. The overall value of the Fuel Allowance must now be increased by paying it for 32 weeks and increasing the weekly amount by €15 in line with home energy inflation to a weekly amount of €48. Estimated cost of increased amount and payment period: €228 million.²⁸
- II. Improve the targeting of supports for people at risk of energy poverty. Households in work on low pay receive no support for energy costs. Budget 2023 should recognise this and extend the Fuel Allowance to recipients of WFP. Estimated cost of expanding eligibility: €68 million²⁹

The rationale for targeting of emergency assistance with energy costs is clear. Directing resources to those most at risk of harm represents the best investment in preventing the worst outcomes of energy poverty that include detriment to physical and mental health, being forced to go without essentials such as heating, light, but also food or other costs, and the financial impact of bills that can't be met. It has also been stated by the ESRI that 'broad-based or untargeted compensatory measures may fuel further non-energy inflation.'³⁰

The social welfare system is designed to identify and support those on the lowest incomes in Ireland: payments such as the Fuel Allowance therefore provide a direct route to those who are least able to cope with price rises.

c. Additional Needs Payments

During ongoing energy inflation, it will not be sufficient that safety-net programmes like the Additional Needs Payment are technically available; there must be accountability that the payment is reaching the households who need it and are being paid at adequate levels to assist households to move out of the emergency situation.

If the uptake for these essential payments doesn't reflect the hardship we know is being experienced, that is the responsibility of the Government and it should be examined accordingly.

The application and payment process should be expedited in all cases where urgent action is needed, such as when someone is rationing their energy use throughout the winter, cutting back on food, or going without other essentials.

²⁸ SVP (2022) 'The Cost of Surviving' Available at: <https://svp.ie/getattachment/5ca78a6d-af8a-4f3c-a713-09dcb3da5473/SVP-PBS-2023-The-Cost-of-Surviving.aspx>

²⁹ Ibid.

³⁰ ESRI (2022) 'ENERGY POVERTY AND DEPRIVATION IN IRELAND'
<https://www.esri.ie/system/files/publications/RS144.pdf>

d. Social tariff

SVP has advocated in recent years for a feasibility study to be funded by government that considers the potential impact of a social tariff for energy.³¹ During this period of energy price turbulence, we now recommend that the government works with the Regulator and Suppliers to introduce a reduced social tariff, funded through general taxation, targeted at households on the lowest incomes. This will create a route to target price support at customers most at risk of energy poverty.

In the UK the Resolution Foundation has now called for a social tariff with a 30% reduction on the bills of customers in receipt of means-tested benefits, funded by general taxation.³²

Unlike the existing price cap model, a social tariff is targeted, and the Resolution Foundation have recommended it could apply to households in receipt of benefits or those where no one earns more than £25,000 per year (with the potential to taper this amount, with a lower social tariff). National Energy Action has also called for a social tariff in the UK that would be additional to the UK's Warmer Home Discount; be mandated across all suppliers; be targeted at those most in need; and auto-enrol all eligible customers.³³

A social tariff in Ireland could be targeted at households at risk of energy poverty, and could use receipt of the Fuel Allowance as a passport. Processes undertaken so far in Ireland, such as the universal electricity credit, could have been targeted or weighted towards just those on a social energy tariff, avoiding the possible inflationary impact of a broad-based credit which includes many households (including second homes) who do not need it. Providing a proportional reduction on overall bill cost or unit rate would also reflect household energy need, whereas Fuel Allowance is paid at one rate despite household size or necessary usage.

e. Consumer Vulnerability Legislation

In Ireland, the statutory definition of a 'Vulnerable'³⁴ customer as used in the energy market is detailed within Statutory Instrument No. 463/2011 - European Communities (Internal Market in Electricity and Gas) (Consumer Protection) Regulations of 2011:

³¹ SVP (2021) 'Submission to the Climate Action Plan 2021' Available at: <https://svp.ie/getattachment/d74cc95b-767d-46bb-8691-9df401f0d139/SVP-Submission-to-Climate-Action-Pan-2021.aspx>

³² Resolution Foundation (2022) 'A chilling crisis: policy options to detail with soaring energy prices' Available at: <https://www.resolutionfoundation.org/app/uploads/2022/08/A-chilling-crisis.pdf>

³³ NEA (2022) 'Solving the cost of living crisis: the case for a new social tariff' Available at: https://www.nea.org.uk/wp-content/uploads/2022/07/2022_Solving-the-cost-of-living-crisis_v02.pdf

³⁴ Important critiques of the use of the term 'Vulnerable' include that many people do not identify as vulnerable and therefore do not know the protections could apply to them. It can also imply an

“vulnerable customer” means a household customer who is—

(a) critically dependent on electrically powered equipment, which shall include but is not limited to life protecting devices, assistive technologies to support independent living and medical equipment, or

(b) particularly vulnerable to disconnection during winter months for reasons of advanced age or physical, sensory, intellectual or mental health³⁵

This follows an EU directive which states:

‘Member States shall take appropriate measures to protect final customers, and shall, in particular, ensure that there are adequate safeguards to protect vulnerable customers. In this context, each Member State shall define the concept of vulnerable customers which may refer to energy poverty and, inter alia, to the prohibition of disconnection of electricity to such customers in critical times. Member States shall ensure that rights and obligations linked to vulnerable customers are applied.’³⁶

Research has examined the various interpretations used by fellow member states, finding that 14 member states including receipt of social welfare in their definition of vulnerability, 6 referring to specific socio-economic groups, and 3 referring to energy affordability (using a measure based on low income and high expenditure).³⁷

The same research notes that some members states use the protections to go beyond prohibiting disconnection, but also extend consumer protections including allowing for switching supplier with existing arrears; having specific codes of conduct; and providing additional assistance.³⁸

individualisation that does not highlight the structures that put people in a vulnerable position. We therefore attempt to only use it when referring to the statutory terminology of Vulnerability, and how these protections can be of use to consumers.

³⁵ S.I. No. 463/2011 - European Communities (Internal Market in Electricity and Gas) (Consumer Protection) Regulations of 2011 Available at: <https://www.irishstatutebook.ie/eli/2011/si/463/made/en/print>

³⁶ DIRECTIVE 2009/72/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 13 July 2009 concerning common rules for the internal market in electricity and repealing Directive 2003/54/EC Available at: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:211:0055:0093:EN:PDF>

³⁷ Pye, S. et al (2015) ‘Addressing energy poverty and vulnerable consumers in the energy sector across the EU’ Available at: <https://www.cairn.info/revue-l-europe-en-formation-2015-4-page-64.html>

³⁸ Pye, S. et al (2015) ‘Addressing energy poverty and vulnerable consumers in the energy sector across the EU’ Available at: <https://www.cairn.info/revue-l-europe-en-formation-2015-4-page-64.html>

The definition used in Ireland's interpretation of vulnerability is currently limited in comparison to other EU member states when it comes to risk of energy poverty, focusing solely on health or age.

We would recommend including households at risk of energy poverty (this could be via the expenditure method, household income, or receipt of a social welfare payment) into these consumer protections. This would remove the threat of being cut off from essential energy use for households who simply don't have the funds to meet bills, and require affordable, tailored repayment solutions rather than disconnection (or threat of disconnection).

As discussed later in point H of this question, the uptake of these protection also requires attention and action from the Regulator and Suppliers.

f. Filling the gap for energy advice

In order to support low-income households and those in energy poverty through the green energy transition, we recommend establishing a service of local Community Energy Advisors working in partnership with the Sustainable Energy Authority of Ireland and other local partners.³⁹

There is currently a notable advice gap available to households at risk of energy poverty to address their immediate energy needs (for example, understanding bills and navigating tariffs), through to introducing energy efficiency measures and accessing retrofitting funding.

Community Energy Advisors would engage and inform hard to reach energy users who would most benefit from energy advice and energy efficiency upgrades across all tenure types. This advice service should approach energy poverty holistically and offer support through immediate assistance and quick-fix measures as well as supporting households towards larger retrofitting projects. At a time of energy crisis they could also liaise directly with income and financial support services to make sure households are accessing all the income support they are eligible for, such as Additional Needs Ps from DSP.

In the MABS and UCC 'Energise' research, the survey found 56% of recipients cited one-to-one advice as a measure that would encourage them to increase energy efficiency, 53% of

³⁹ SVP (2021) 'Submission to the Climate Action Plan 2021' Available at: <https://svp.ie/getattachment/d74cc95b-767d-46bb-8691-9df401f0d139/SVP-Submission-to-Climate-Action-Pan-2021.aspx>

respondents would like more information on the benefits. Quotes from participants mentioned support in the process, particularly citing help with forms which can be confusing, and wanting to talk to someone face to face.⁴⁰ The study also found that respondents found friends and family the most trustworthy source of advice and referenced research which has found that sharing information in pre-existing social groups through discussion and participation encourages behaviour change.

The need for community energy advice has been echoed by MABS and Friends of the Earth and follows the evidence of the role of social influence in modelling and encouraging energy interventions, as identified in research by the ESRI.⁴¹ It would mirror the partnership based and 'trusted local actor' approach of the piloted Warmth and Wellbeing Scheme.

Examples of Community Energy Advice exist in the UK, where the EnergyWorks Team in Manchester are one example of one-to-one support provided to energy poor households to improve their wellbeing and financial circumstances.⁴² Amongst other services the EnergyWorks team:

- Identifies the causes of heat loss, leaks, damp or mould in the home and installs 'quick' energy efficiency measures
- Supports residents in applying for government financial support such as Warm Homes discount or emergency payments
- Assists customers to sign up for Priority Service Registers, and supports in measures such as tariff switching
- Provides onward referrals

As such, they provide a service that tackles energy poverty holistically, and bridges what can be very siloed services between energy efficiency and building fabric aspects; income and financial challenges; and experiences as a customer within a complex energy market.

[The Regulator and Supplier Response:](#)

g. The role of the Regulator

The regulated energy market is the main conduit through which households in Ireland are able to provide essential power to their homes and provide for their energy needs. SVP

⁴⁰ UCC (2021) 'ENERGISE: Enhancing the transition to energy citizenship: Connecting households with low disposable incomes.' Available at:

<https://www.ucc.ie/en/media/research/iss21/ENERGISEpolicybriefingpdf.pdf>

⁴¹ ESRI (2021) 'Social influence and economic intervention policies to save energy at home' Available at: [esri.ie/publications/social-influence-and-economic-intervention-policies-to-save-energy-at-home-critical](https://www.esri.ie/publications/social-influence-and-economic-intervention-policies-to-save-energy-at-home-critical)

⁴² The Energyworks details can be found here: <https://www.groundwork.org.uk/greendoctor/our-partners/energyworks-green-doctors-in-greater-manchester/>

engages with the regulator and with suppliers to discuss the steps that must be taken to protect customers in energy poverty within the energy market.

Since the pandemic SVP has been highlighting the priorities for the people we support as prices rise (these are fully outlined in a submission available on our website⁴³). Priorities from our perspective include:

- Supplier must take steps to identify and communicate with prepay customers who are self-disconnecting and offer them support to stay on supply
- Ensuring repayment plans for arrears are affordable and do not limit households' ability to meet their ongoing energy or other essential needs
- Proactively and positively engaging with customers to offer support, including signposting to services such as MABS.⁴⁴
- Ensuring all engagement from a customer is recognised to avoid disconnection (the Energy Engage code stipulates that suppliers don't disconnect a customer who is engaging to repay arrears).

In the area of consumer protection, we have two overarching recommendations:

- I. To ensure the Regulator is in the best position to protect customers the CRU should devise and publish multi-annual strategies over how it will develop consumer protection to support customers most at risk within the energy market. This includes customers in energy poverty and who are Vulnerable. These should be informed by expert research and monitored with annual updates and accountability.
- II. The government should consider the development of a statutory Energy Consumer Advice and Advocacy Service. This independent service would advocate for consumers within the energy market and work in partnership with the Regulator on the development of consumer protections. We believe this could be a very valuable role as the energy market undergoes significant changes in response to current inflation and climate imperatives. In England and Wales, Citizens Advice has a statutory role to provide specialist energy advice to the public, to refer customers on to its Extra Help Unit (a specialist support for complex complaints and for customers in vulnerable circumstances) and to undertake policy and advocacy work from the consumer's point of view to the regulator, market actors, and government.⁴⁵

These overarching recommendations are informed by SVP's experience (which we believe is mirrored by many organisations) that there are vastly different experiences and needs of

⁴³ SVP (2022) 'Proposals for the CRU' Available at: <https://svp.ie/getattachment/bfc1be36-2044-4f6e-8bfa-c954adf3cdbc/SVP-Proposals-for-the-CRU-March-2022.aspx>

⁴⁴ Ibid.

⁴⁵ Citizens Advice UK (2022) 'Consumer Advocacy and advice at Citizens Advice' Available at: <https://www.citizensadvice.org.uk/Global/CitizensAdvice/Citizens%20Advice%20consumer%20advice%20and%20advocacy%20annual%20report%202021-22.pdf>

different consumers within the energy market, and that there should be specific strategies based on expert evidence for these groups.

h. Priority and Special Services Protections

We have expressed concern about the low take-up of the Vulnerable Priority and Special Services registers within the energy market. These provide important protections to avoid disconnection due to non-payment to customers at risk of the health consequences of being without supply. The low awareness and registration levels of eligible customers means this essential protection is not reaching all those who need it this year.

Supplier and CRU communications should also make customers aware of the priority and vulnerable customers register to check whether they are eligible for additional protections. Awareness of these additional registers is very low (in 2020 measured at 22% for electricity customers and 23% for gas customers for the Special Service registers, with 7% of those eligible actually registered. For priority registration (for those dependent on electrically powered equipment) awareness is 30%, and 41% of those eligible are registered).⁴⁶

Ahead of winter when many customers may not be able to pay their bills, the reality that many people will not be registered when they should be, means there is a significant risk that customers will be disconnected who should not be as they face severe adverse consequences.

We would like to highlight that many people do not identify as 'Vulnerable' may be eligible, and (among other factors) this could be limiting people signing up. SVP also believe that these essential protections (which are rooted in a statutory definition of Vulnerability, as discussed earlier in this response) could be expanded to more groups, which could begin on a voluntary basis within the energy market.

i. Bill-pay customers

This year SVP has supported customers receiving bills above and beyond what they will have seen before, and which customers have no way of paying outright.

SVP has made recommendations to the Regulator and Suppliers on the terms of repayment plans when a customer is experiencing arrears. SVP believes there should be stronger

⁴⁶ CRU (2020) 'CRU Residential Electricity and Gas Market Survey Results 2020) Available at: <https://www.cru.ie/wp-content/uploads/2021/03/CRU21027-CRU-Residential-Electricity-and-Gas-Market-Survey-Results-2020.pdf>

leadership from the Regulator over what is affordable and manageable for the customer and should monitor the trends in repayment plans to ensure this is being adhered to. This should include the use of upfront payments of portions of the debt, which should (under the Supplier handbook) be presented as an option, but are often experienced by customers as a requirement to avoid disconnection.

We note that in Britain Ofgem monitors the trends in the weekly amount being repaid through payment plans for different sizes of supplier.

j. **Pre-payment customers**

SVP believes that prepayment ‘hardship’ meters (which do not incur additional service charges that ‘lifestyle’ prepayment meters do) for customers who wish to repay arrears on an ongoing basis are an important option. There are many circumstances where they aren’t appropriate, but for some customers they are a useful option.

However, SVP members would be acutely aware of the numbers of people who ‘self-ration’ their energy use via prepay meters and ‘self-disconnect’ when they simply do not have any money to top up. This leads to people under-consuming essential energy use and going without heat, light, or hot water for days at a time.

At a time of price increases (when prepay customers see their tariffs go up in real time, without the lag experienced by bill-pay customers) self-rationing and self-disconnection will only get more severe and more widespread.

We believe there should be stronger protections in place within the energy market to identify and support these customers, and that further research is needed with this customer group to understand top-up practices. This is especially important in light of the transition to smart meters and the interaction this will have with prepay capabilities, as outlined in our submission to the CRU in 2021⁴⁷.

⁴⁷ SVP (2021) ‘Smart Pay as you go: Submission to the CRU’. Available at: <https://www.cru.ie/wp-content/uploads/2021/04/CRU210461-SVP-Response-to-CfE-on-Smart-PAYG.pdf>

Q4. In the area of governance, research, measurement and evidence, what further action could be taken to alleviate energy poverty? Please provide any relevant analysis or research to support your suggestions.

Governance

SVP have joined with 18 other organisations to call for the new energy poverty plan to be put on a statutory footing.⁴⁸ The organisations have jointly recommended that:

1. The strategy is put on a statutory footing to ensure policy coherence and a whole-of-government approach
2. Data collection is improved, including recognising the expenditure method alongside the levels of people spending below this threshold but not able to meet their energy needs.⁴⁹
3. There are specific targets for groups at highest risk of energy poverty, including groups at high risk but currently under-represented in official statistics such as members of the Traveller community.
4. Those with lived experience of energy poverty are included in the design and delivery of the new strategy
5. The new strategy is built on a rights-based approach
6. The new strategy is aligned with climate justice and must aim to eradicate both energy poverty and energy pollution at the same time.
- 7.** The Strategy paves the way for a new Energy Poverty Act in 2023, which will include a legally binding target to reduce energy poverty

Measurement

Currently, energy poverty levels are released ad hoc, and trends – particularly among specific groups within the population – are difficult or impossible to monitor. There should be a data strategy to address this gap, and it should focus on providing regular, segmented monitoring of energy poverty.

As we face the prospect of over 40% of households experiencing energy poverty, this data should monitor the level of energy poverty being experienced (for example, 10%, 20%, and

⁴⁸ CLM (2022) 'Community organisations issue joint call and recommendations for a new Energy Poverty Strategy' Available at: <https://communitylawandmediation.ie/change/community-organisations-issue-joint-call-and-recommendations-for-a-new-energy-poverty-strategy/>

⁴⁹ The 'energy poverty' and 'energy deprivation' definitions used by the ESRI offer a clear way of doing this <https://www.esri.ie/system/files/publications/RS144.pdf>

30% expenditure thresholds) so we are aware of the severity of the situation for different groups.

While there are many strengths to the expenditure method, it does not paint a full picture of energy poverty as many households underspend due to limited incomes, and many households are not counted within official statistics.⁵⁰ The data strategy should therefore include complementary indicators, and ways of monitoring levels for groups currently excluded from official statistics such as members of the Traveller Community.⁵¹

Research and Evidence

The CRU should proactively commission research and develop new consumer protection measures based on the recent experiences of the pandemic and price rises, as well as issues previously raised including into the experience of self-rationing and self-disconnecting prepay customers (which is relevant for the smart meter roll out), or ways to maximise the reach and effectiveness of Vulnerable customer protections.⁵²

Q5. Please also provide any additional relevant information or views that you would like to submit.

Summary of Recommendations

Question 1

- 1. There needs to be retrofitting sub-targets for the groups and cohorts who are at the highest risk of energy poverty to make sure that improvements in energy efficiency are reaching all parts of society. This includes households and children in poverty, people with ill-health or disabilities, and the Traveller community. The proportion of each group that has benefited from energy efficiency measures should be monitored.**
- 2. The rental sector needs specific and ambitious retrofitting strategies in order to effectively target children living in energy poverty.**
- 3. There should be a retrofitting scheme particularly targeted at households with a member living with ill health or a disability (as a continuation of**

⁵⁰ SVP (2019) 'Growing up in the cold'. Available at: <https://www.svp.ie/getattachment/2cb10388-e3ca-41ef-9911-a17f252ce09c/Growing-up-in-the-Cold.aspx>

⁵¹ National Traveller MABS (2019) 'Accommodating Ethnicity: Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers' Available at: <https://www.ntmabs.org/publications/development/2019/ntmabs-energy-poverty-report.pdf>

⁵² SVP (2022) 'Proposals for the CRU' Available at: <https://svp.ie/getattachment/bfc1be36-2044-4f6e-8bfa-c954adf3cdbc/SVP-Proposals-for-the-CRU-March-2022.aspx>

the Warmth and Wellbeing pilot), and free energy upgrades should be extended to all homeowners in receipt of the Disability Allowance.

4. There should be specific energy efficiency schemes (including reform of the Caravan Loans Scheme) to reduce the unacceptably high levels of energy poverty in the Traveller Community
5. The allocation of the Fuel Allowance to Traveller households needs to be immediately addressed as we head into winter, so each household receives a separate payment.

Question 2

1. The number of local authority homes being retrofitted each year must be increased, with 10% of the LA target upgraded next year, and the ambition to reach minimum BER levels for all LA housing by 2030.
2. SVP and Threshold have set out 15 recommendations to improve energy efficiency in the PRS, as set out below.
3. When the EEOS scheme is reviewed the government should consider incorporating private tenants in energy poverty into the scheme.

Question 3

1. Targeted and sustained support through the social welfare system, including through core social protection rates, is needed throughout energy price inflation.
2. The Fuel Allowance should be increased by €15 per week and paid for an additional 4 weeks of the year. It should be extended to recipients of the Working Family Payment.
3. Additional Needs Payment should be accessible and paid at adequate levels for energy costs. The application and payment process should be expedited in all cases where urgent action is needed, such as when someone is rationing their energy use throughout the winter, cutting back on food, or going without other essentials.
4. SVP recommend that the government works with the Regulator and Suppliers to introduce a reduced social tariff, funded through general taxation, targeted at households on the lowest incomes. This will create a route to target price support at customers most at risk of energy poverty.
5. SVP recommend including households who are financially vulnerable in the statutory definition of 'Vulnerable' customers, to extend the protections to those at risk of energy poverty.
6. The government should work with SEAI and local partners to create a Community Energy Advice service to support customers with their energy needs, from immediate cost pressures through to longer term efficiency measures.
7. SVP reiterates its priorities for consumer protection regulations, as submitted to the CRU earlier in 2022.

- 8. The CRU should devise and publish multi-annual strategies over how it will develop consumer protection to support customers most at risk within the energy market. This includes customers in energy poverty and those considered Vulnerable. These should be informed by expert research and monitored with annual updates and accountability.**
- 9. The government should consider the development of a statutory Energy Consumer Advice and Advocacy Service. This independent service would advocate for consumers within the energy market and work in partnership with the Regulator on the development of consumer protection. We believe this could be a very valuable role as the energy market undergoes significant changes in response to current inflation and climate imperatives.**
- 10. Supplier and CRU communications should make customers aware of the priority and vulnerable customers register to check whether they are eligible for additional protections.**
- 11. SVP has made recommendations to the Regulator and Suppliers on the terms of repayment plans when a customer is experiencing arrears. SVP believes there should be stronger leadership from the Regulator over what is affordable and manageable for the customer, and should monitor the trends in repayment plans to ensure this is being adhered to.**
- 12. There should be stronger protections in place within the energy market to identify and support prepayment customers, and that further research is needed with this customer group to understand top-up practices.**

Question 4

- 1. SVP have joined with 18 other organisations to call for the new energy poverty plan to be put on a statutory footing.**
- 2. There should be a data strategy to address the gap in information about people living in energy poverty, and it should focus on providing regular, segmented monitoring of energy poverty.**
- 3. The CRU should proactively commission research and develop new consumer protection measures based on the recent experiences of the pandemic and price rises, as well as issues previously raised including into the experience of self-rationing and self-disconnecting prepay customers (which is relevant for the smart meter roll out), or ways to maximise the reach and effectiveness of Vulnerable customer protections**

Recommendations in ‘Warm Housing for All? Strategies for improving energy efficiency in the PRS’ SVP and Threshold, 2021

| ENERGY EFFICIENCY STANDARDS: CURRENT STANDARDS | |
|--|--|
| 1 | Further information is needed on the BER of properties. Research should be funded to establish and map the energy efficiency of the properties currently in the private rental sector as part of a National Housing Survey. This would be similar to the annual Scottish House Condition Survey and English Housing Survey. |
| 2 | Ensure existing legislation on Building Energy Rating (BER) is fully implemented so that properties provide rating when advertising a property. Various options could be explored to improve compliance, including better resourcing, building control units within Local Authorities, or transferring this competence to SEAI. |
| 3 | Working with intermediaries and membership organisations, Government should fund a campaign to encourage landlords to invest now in ‘easy win’ measures. It could include funding and advice events that emphasise the opportunities and benefits to both landlords and tenants. |
| 4 | Consultation should be carried out with apartment owners via membership organisations and community networks to identify specific needs of this cohort to undertake retrofitting. |
| OPPORTUNITIES AND BARRIERS TO PROGRESSING RETROFITTING IN THE PRIVATE RENTED SECTOR | |
| 5 | In light of the commitment in Housing for All to implement minimum energy efficiency standards in the private rented sector, the Government should now publish a long term retrofit plan for the private rented sector with clear milestones, targets and funding, that incorporates realistic forecasted capacity of the construction sector. |
| 6 | There needs to be increased capacity in the construction sector in accordance with a long term retrofit plan, including support for specialist skills development and certification, and Centres of Excellence. Public investment in retrofitting should be used to promote good work opportunities in local economies. |
| 7 | Ensure One Stop Shops are prepared to support retrofitting in the private rented sector, including providing advice, information and support to both tenants and landlords. |
| 8 | Set up a demonstration project through a One Stop Shop to coordinate aggregated retrofits for multiple landlords or landlords who own multiple properties. |
| FINANCING RETROFITTING IN THE PRIVATE RENTED SECTOR | |
| 9 | To overcome the split incentive there is a need to create a framework, including financial incentives, to encourage landlords to upgrade their properties. This should be informed by consultation with landlords to understand the needs and financial circumstances of private landlords. |

| | |
|---------------------------|--|
| 10 | Revise the Repair and Lease scheme to make it more attractive and accessible, as well as the adoption of a more proactive approach to its promotion. |
| 11 | <p>Properties in the private rented sector should be eligible for funding equivalent to the Better Energy Warmer Homes scheme, based on a tenant receiving the Housing Assistance Payment. However, eligibility should be contingent on the landlord providing a long-term lease or indefinite lease to the tenant.</p> <p>Any landlord availing of such an allowance will have to keep the property in the rental market for a set period of time after claiming for the works. Access to the grants must be conditional on passing an inspection to ensure the property and landlord is compliant with the Housing (Standards for Rented Houses) Regulations 2019.</p> |
| PROTECTING TENANTS | |
| 12 | Best practice on carrying out work with tenants in situ needs to be shared. One Stop Shops and funding services should promote and be prepared to support landlords to carry out retrofitting with tenants in situ. |
| 13 | Any exemptions from Rent Pressure Zone cap on rent increases based on refurbishment should be closely monitored by the RTB to ensure they are in line with legislation. |
| 14 | Review current consumer protection mechanisms for property owners procuring retrofitting work, and ensure there is a comprehensive framework in place, and that consumers are aware of their rights. |
| 14 | Minimum energy standards need to be communicated clearly to property owners and tenants: awareness raising of landlord obligation and tenant rights and options should begin as early as possible and be properly funded. |
| 15 | Improve enforcement of standards in the private rented sector, including energy efficiency standards through adequate ringfenced resources for an 'NCT model' so that local authorities can not only conduct inspections but also improve the standards of the country's rental stock. |