



Submission to the Department of the Environment, Climate and Communications on the Energy Poverty Action Plan Consultation

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About Age Action

Age Action is the leading advocacy organisation on ageing and older people in Ireland. Age Action advocates for a society that enables all older people to participate and to live full, independent lives, based on the realisation of their rights and equality, recognising the diversity of their experience and situation. Our mission is to achieve fundamental change in the lives of all older people by eliminating age discrimination, promoting positive ageing and securing their right to comprehensive and high-quality services.

Key Points

- The Action Plan should explicitly recognize and respond to the needs and circumstances of older persons in Ireland.
- The Action Plan should commit to implementing an Energy Guarantee for Older Persons, along the lines Age Action has proposed.
- The Action Plan should endorse the recommendations made in the Joint Letter on Energy Poverty signed by Age Action and other community and voluntary organizations.¹
- The Action Plan should connect the aim of eliminating energy poverty with achieving a just transition away from fossil fuels.
- The Action Plan should take account of how energy poverty impacts people's transport choices, and design transport-based as well as home heating-based solutions.

Quotes from Respondents to Age Action Lived Experience of Older Persons Survey 2022

"I live with a disability and the cost of heating is terrible, sometimes I go to bed early."

"I'm 83 and live in a house built in the late seventies... It's impossible to warm my house! The last few years I haven't been able to put the heat on till 5.30 every day. Can't imagine what I'm going to do this winter!! I can cut down on food! My worry is keeping warm. Please help."

"My home, built in the early 70s, is very expensive to heat and I can't afford to avail of the grants to upgrade it."

"I am living cautiously, there is less variety in my diet, over the winter I put the central heating on for an hour in the morning, I light my fire in the evening for about two hours, I counted the number of briquettes I could use. No coal this past winter to help the environment. Wore lots of layers, used a rug for heat, using car once a week for shopping."

"Everything from food to heating, etc. seems to get dearer by the week. Thank God for our free travel or we'd be like prisoners in our own homes."

"I had plans to get more dry lining and cavity walls filled to make house warmer. Also my car needs replacing and was looking into getting"

¹ https://www.ageaction.ie/sites/default/files/joint_statement_on_energy_poverty_and_energy_pollution_dated.pdf

electric car. Because of my savings over years, I would not qualify for grants. I wanted to do this for the environmental benefits. Rising costs have made me feel I should not undertake any major costs at this time.”

“I am concerned about the approaching winter on a fixed income.”

“I try my best to not put the heating on at all and just use extra clothes, throws etc. to keep warm. Also petrol costs have meant that I have cut down my already very low usage of my car to just one trip a week to visit my elderly mother in a nursing home.”

Responses to Consultation Questions

1. What further action could be taken to alleviate energy poverty through home energy upgrades?

The Action Plan’s approach to energy upgrades should explicitly recognize the circumstances of older persons in Ireland. The Programme for Government commits to supporting “ageing in place”, which means supporting people to continue to live in the homes and communities where they have built their lives.

Age Action not only hears about older persons’ housing concerns in our roles providing information and as an advocacy service, but we also have direct experience of delivering housing adaptation through our Care and Repair Service.² We know from our work and from our recent research – *Agency and Ageing in Place in Rural Ireland*³ – carried out with UCC partners that home maintenance is a major barrier to people ageing in place. A crucial factor in the adequacy of older persons’ housing in Ireland is energy efficiency, and if their right to age in place is to be protected, schemes such as those administered by the SEAI must be able to accommodate the needs and circumstances of the older population.

Age Action, in a joint statement endorsed by other community and voluntary organizations,⁴ made the following recommendations related to home energy upgrades:

- Set a new target of retrofitting 100% of social housing stock to a B2 standard by the end of this decade.
- Increase available individual grant sizes to 100%.
- Grants should be administered on an income-based sliding scale so the households on the lowest income can avail of the most support.

² <https://www.ageaction.ie/how-we-can-help/care-and-repair>

³ <https://www.ageaction.ie/agency-and-ageing-place-rural-ireland>

⁴ https://www.ageaction.ie/sites/default/files/joint_statement_on_energy_poverty_and_energy_pollution_dated.pdf

- Eligibility criteria for the Free Energy Upgrades should also take account of how well insulated a home is pre-works, so that the most poorly insulated houses are brought into the scheme.
- Every local authority should employ Local Community Energy Advisors to promote uptake of retrofit schemes, particularly among hard to reach and disadvantaged groups.
- There should be a dedicated energy upgrade scheme for rural housing dependent on solid fossil fuels.
- There should be a Solar PV grant available for persons living in mobile homes, to assist the many Travellers living in energy poverty who are excluded from the current system.
- SEAI should have the resources to coordinate promotion of the schemes with relevant organizations working with persons experiencing energy poverty.

These recommendations should be reflected in the new Action Plan.

The SEAI Grants and Older Persons

The current SEAI schemes are undoubtedly very helpful and have made real differences in many people's lives. However, Age Action has identified gaps in their ability to support older persons.

The Free Energy Upgrade is limited to households in receipt of Fuel Allowance, or else other social welfare payments most older persons do not receive. This automatically excludes nearly two-thirds of older persons. While older persons with the lowest incomes qualify under this scheme, it likely excludes large numbers who otherwise cannot afford retrofitting. Most older persons are on low incomes and have little or no cash savings.

The One Stop Shop Service sets limits on how much can be spent on each area of work which will likely disadvantage those occupying the most poorly insulated homes. They also neglect some ancillary costs, like consultations with architects or additional works that may become necessary following retrofitting works, such as upgrades to electric wiring.

The Individual Energy Upgrade Grants cover up to 50% of the cost of works taken to improve the energy efficiency of a home. This can be used for a deep retrofit, yet the remaining costs will likely be beyond the means of most older persons, particularly those in need of especially extensive upgrades.

Many older persons are unable to access loans, and half of them have cash savings of €12,300 or less, according to the latest CSO survey findings.⁵ This means both that individual grant sizes need to be raised to cover 100% of costs incurred, it also means that even if the grant size is sufficient, older persons can be excluded if they're expected

⁵ <https://data.cso.ie/table/HFC2011>

to pay up front costs and later be reimbursed, or if there are certain costs that aren't covered, like painting and decorating after the work has been completed.

Older persons need warmer homes than most other demographics, often due to health problems. The Warmth and Well-Being Pilot Scheme was a promising response to this reality, and the review of the scheme should be published as soon as possible. If the scheme was found to effectively protect the health of older persons, the Action Plan should commit to scaling up the scheme. However, eligibility should be changed so it is not limited to persons entitled to the Fuel Allowance, which currently only a third of older persons receive.

Another impediment to uptake of home energy upgrades is the bureaucratic burden of the process. There needs to be a simplified process for applying for SEAI grants, which could be effectively instituted through the One Stop Shops. This is especially necessary given that older persons often have competing housing needs, particularly between maintenance and repairs versus retrofitting for insulation, which they may have to choose between in the absence of supports that can both eliminate cost and limit the amount of time that needs to be committed to the process.

Age Action estimates that 65% of people aged 65+ are digitally excluded. In 2016, 61% of people aged from 55 to 65 had low literacy.⁶ As the State adopts a 'digital first' approach to public service delivery, the process to access retrofit schemes should remain accessible offline for the entirety of the process. This includes in terms of initially accessing information and relevant forms, which should be available through local contact points. The application forms and other relevant documents should be available in plain English. These measures should be taken across all public services but are particularly important for services and schemes catering to older persons.

While the State should make efforts to increase availability of home energy upgrades, realistically, many older persons will not be able to have their homes brought to a high level of energy efficiency in the near future. As such, it is important to adopt other approaches to protecting the people in the most poorly insulated homes, who are disproportionately older persons.

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

In our joint statement, we made the following recommendations regarding energy poverty in the rental sector:

- There needs to be a retrofitting scheme targeting private rental properties, and grants introduced for private landlords to undertake deep retrofits.
- People living in the private rental sector and receiving HAP should be eligible for the Warmer Homes Scheme. If benefits are associated with HAP, discrimination against those in receipt of the payment may be mitigated.

⁶ <https://assets.gov.ie/13262/eed6128954b7449c8cc357dc44fd4a9d.pdf>

For these changes to be fair, they need to be introduced in tandem with protections for long term tenure, which includes not allowing evictions based on renovations being undertaken. In light of the cost-of-living crisis, the government should reinstate a blanket ban on evictions and a rent freeze. This is particularly valuable for older persons, a growing number of whom are in the rental sector and unable to manage rising rents, or the poor quality of housing stock, which is often unsuitable to their needs. With regards inadequate housing in the private rental sector, the Action Plan should commit to introducing a minimum BER rating for all properties being rented out.

No changes to the rental sector that aim to alleviate energy poverty should disincentivize older persons letting out rooms under the rent a room scheme.

3. In the areas of energy prices, meeting the cost of energy and consumer protection, what further action could be taken to alleviate energy poverty?

An Energy Guarantee for Older Persons

The new Energy Poverty Action Plan should commit to the implementation of an Energy Guarantee for Older Persons. This is a transformed version of fuel allowance that has three key characteristics.

- Firstly, it is a cash payment benchmarked and indexed against the price of energy.
- Secondly, eligibility will be determined not only based on income, but also a home's insulation level.
- Thirdly, the Guarantee would be a banded payment, with persons on lower incomes and/or in more poorly insulated homes receiving a larger income supplement.

The dwellings occupied by older persons tend to be older and therefore poorly insulated, with an estimated 300,000 homes with a Building Energy Rating of E, F or G occupied by older persons. This means that home heating costs can be exorbitant for many, especially the two-thirds of older households not receiving Fuel Allowance payments. The Fuel Allowance only looks at an applicant's income, yet insulation also impacts how affordable it is to keep a house warm. Age Action has identified this as a major gap with at least 80,000 older person households with modest incomes and high energy bills likely to be excluded from Fuel Allowance, making them particularly at risk to energy unaffordability this winter.

This gap means that even if the Fuel Allowance is increased, and eligibility widened, the initial design is so flawed that many people in need will still be left out. Moreover, the payment available under the Fuel Allowance is inadequate. In January 2022, 833 of the

963 people receiving the heating supplement were already in receipt of Fuel Allowance.⁷

After a period of relative stability, energy prices have soared and many people on low to moderate incomes are struggling to cope with the increased cost of home heating. The extraordinary spike in energy prices seems likely to continue for some time, and it has worsened the gap in the existing Fuel Allowance scheme and other social welfare income supplements. While the effects of the war on Ukraine may be one-off, the war will have long-lasting effects on fuel costs. Moreover, many gas and electricity bills had already risen significantly before the war began. Unaffordable energy is going to remain a problem for the foreseeable future. If we are serious about transitioning to a low carbon economy, including through necessary carbon taxation, fossil fuel prices will only continue to rise.

Nine in ten older persons rely on fossil fuels, with half using home heating oil, a quarter relying on gas for home heating and 14% relying on solid fuels. Across the whole population, 85% of people use fossil fuels, including 40% using home heating oil, 33.5% using gas and 10% using solid fuels. Many lower income households cannot afford to change their central heating systems and are unable to “transition” away from reliance on fossil fuels. Climate justice requires there to be robust social welfare schemes to support people with their energy costs when they are unable to avoid using fossil fuels.

The Programme for Government commits to using €3 billion in carbon tax revenue to combat fuel poverty by 2030. Despite this, 71% of the €146 million in carbon tax revenue allocated to social protection in 2022 was used for generic social welfare increases. These social welfare increases should be made anyway, and carbon tax revenue should be reserved for sustainable, targeted schemes that identify and assist people struggling to keep their homes warm. Doing so would give people a clearer link showing how carbon taxation funds supports directly linked to energy poverty (as opposed to funding generic welfare payments).

Age Action is proposing that the insulation level of any given home is determined by an applicant’s response to a short set of questions. These would not need to establish level of insulation to any great degree of specificity, such as an estimated BER, but rather whether the house is poorly, moderately, or well insulated. The category of “poor insulation” is meant to approximate a BER of E, F or G.

Age Action’s proposal has been met with support from many different parties, within and outside of the state. However, some raised the concern that applicants for this redesigned version of fuel allowance would be unable or unwilling to adequately answer questions regarding their home and insulation.

Every year in advance of our budget submission, Age Action conducts a survey with older persons to gain further insight into their lived experience and to ascertain their policy priorities. This survey is non-representative, as respondents are recruited from our membership. However, it can point to broad trends among older persons in Ireland.

⁷ https://www.oireachtas.ie/en/debates/question/2022-05-26/273/#pg_273

This year, we included questions on housing type and insulation, to demonstrate older persons' knowledge of same. Of the 244 persons who responded to our survey, 243 answered the questions on fuel type and housing type, and 239 answered questions on level of insulation. 97% were able to tell us their fuel type and 89% could tell us the decade their house was built in. We also asked whether their home possessed eight characteristics which would improve energy efficiency (e.g., heat pump; attic loft insulation; double or triple glazed windows). 75% of respondents knew the answer for at least seven or eight of the items.

The fact that most people could confidently answer these questions is a strong indication that Age Action's proposed energy guarantee payment could be successfully targeted towards people in poorly insulated homes using similar questions on the application form for the payment. This is especially because people will have much greater motivation to seek out and provide information regarding their house and their level of insulation if they are applying for state support, rather than voluntarily and anonymously responding to a survey.⁸

Consumer Protection

As was discussed in response to the first question, many older persons experience digital exclusion. In many industries, loyal customers can be charged more than those who switch frequently. The fact that most older persons are not using the Internet or have below basic digital skills is a significant barrier to them "shopping around" or securing the best deals for home energy. It is important that switching is made easier, including for those not using the Internet. Energy suppliers should be required to reduce standing charges and allocate both new and existing customers to the lowest tariffs.

Many utility companies have services for supporting so-called "vulnerable customers". However, many older persons who could benefit from this assistance would not identify as vulnerable. If the language was changed, so that the service was promoted as being "age-friendly", more people would take it up. For example, one telecoms utility that made such a change saw a significant increase in subscriptions once the vulnerable customers list was re-labelled as an "age-friendly" list. The option of registering for this added level of service should be more widely promoted and signposted on all utility bills. The Action Plan should designate non-exhaustive circumstances in which utility providers ought to institute a moratorium on disconnections.

The Action Plan should set out how to fairly manage accounts that fall into arrears, and prevent disconnections for homes with prepaid card meters. Age Action knows from its contact with older persons, as well as existing research, that those experiencing energy poverty do not need to be forced into reducing their energy expenditure – they are already doing this themselves, often to the detriment of their own health and wellbeing. Excessive energy consumption is not a root cause of energy poverty, and therefore prepaid card meters are not a viable solution.

⁸ We can provide more detail of this study on request.

Public information is also needed on the risk involved in under-using energy. For example, the food safety risks of disconnecting fridges or freezers for periods during the day to save energy.

Other Recommendations

In our joint letter on energy poverty with other organizations from the community and voluntary sector, the following recommendations were made in relation to energy affordability and consumer protection:

- The moratorium on disconnections should be extended beyond the winter months to at least spring of 2023.
- Revise eligibility of the Fuel Allowance, including to accommodate the living arrangements of Traveller families and to capture households on modest or medium incomes but in poorly insulated homes (as per the Energy Guarantee).
- Traveller families living on halting sites, adjacent to main homes, or in group housing schemes, *and others in collective situations such as multiple mobile homes sharing a meter*, who did not receive or fully receive the €200 electricity credit should receive it immediately.
- A one-off windfall tax on utility companies that have seen an unusually high profit in the wake of inflation should be instituted. Revenue from this tax should be used to alleviate energy poverty.

4. In the area of governance, research, measurement and evidence, what further action could be taken to alleviate energy poverty?

Along with other organizations in the community and voluntary sector, Age Action has made the following recommendations in relation to the governance of and research under the Energy Poverty Action Plan⁹:

- **A Whole-of-Government Approach:**
 - o Place the Action Plan on **statutory footing** to ensure policy coherence and a whole-of-government approach. In particular, the Action Plan will require cooperation between the Department of Environment, Climate and

⁹ https://www.ageaction.ie/sites/default/files/recommendations_for_irelands_energy_poverty_Action_Plan_.pdf

Communications; the Department of Social Protection; the Department of Health; and the Department of Housing, Local Government and Heritage.

- **Improve Data Collection:**

- The definition of energy poverty needs to be broadened. Energy poverty is currently measured through the “expenditure method” i.e. if a household spends 10% or more of its disposable income on energy, it is considered to be in energy poverty. This is a crude definition as it does not consider home insulation and the additional financial burden often shouldered by older persons, those who live with long-term health conditions, and disabled people. Furthermore, the expenditure method only provides a snapshot at a certain point in time. Whether a household experiences energy poverty can fluctuate depending on the time of year, change in income, and energy prices.
- Households who use less energy than they would need or like to use to afford their bills are also a hidden cohort of those living in energy poverty. It is essential therefore that the expenditure method is combined with the “subjective method” when measuring energy poverty. The subjective method relies on self-reported data on ability to keep your home warm, utility arrears, ability to transition to sustainable sources of energy, etc. This will require gathering first-hand views of those living in energy poverty, as they will best understand what is needed to eradicate the problem.
- There is furthermore a need to identify which type of energy is being consumed, so that a commensurate analysis of health harms resulting from energy poverty can be identified, including respiratory health risks from open fires.

- **Monitoring and Evaluation:**

- Effective monitoring and accountability are essential to track progress and make course corrections, and for citizens and communities to hold the government accountable to its obligations on energy poverty.
- The Action Plan must include 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.
- Clear monitoring and accountability mechanisms that are measurable, actionable, and time-bound are essential to policy coherence and protecting citizens’ rights under the Aarhus Convention.

- **Public Participation:**

- Those with lived experience of energy poverty must be included at all stages in the design and delivery of a new Energy Poverty Action Plan. The Department must ensure that the Action Plan is afforded appropriate and inclusive public consultation and must ensure to reach those with lived experience of energy poverty.
- **A Rights-Based Approach:**
 - We recommend the consultation and collaboration with relevant anti-poverty, housing, Traveller, disability, health, community, social justice and human rights bodies, and to provide seats for such bodies on the Energy Poverty Advisory Group, to ensure the Action Plan is fully poverty- and equality-proofed.
 - In seeking to address energy poverty, the Government should be cognisant of its duties under Section 42 of the Irish Human Rights and Equality Act 2014. This provision obliges all public bodies to promote equality, prevent discrimination and protect the human rights of their customers and service users and everyone affected by their plans and policies. The duty relates to protection of human rights, many of which are engaged in relation to energy poverty, including the right to livelihood, right to health, right to family life and right to non-discrimination.
 - **Aligned with Climate Justice:**
 - We recommend that the new Energy Poverty Action Plan prioritises win-win climate action policies that help address inequality and ensure that the cost of climate mitigation and adaptation measures does not fall unfairly on marginalised and vulnerable groups. Measures must aim to eradicate both energy poverty and energy pollution at the same time, such as increasing retrofitting and energy efficiency measures directed at households experiencing energy poverty.
 - **Commit to delivering an Energy Poverty Act in 2023:** To ensure accountability and long-term political commitment towards the eradication of energy poverty, the Action Plan should commit to delivering an Energy Poverty Act in 2023. Scotland's [Fuel Poverty \(Targets, Definition and Strategy\) \(Scotland\) Act 2019](#) includes the following provisions, by way of example:
 - A new definition and measurement framework for fuel poverty;
 - A legally-binding target to reduce fuel poverty to no more than 5% of households, and that no more than 1% of households should be in extreme fuel poverty, by 2040; (*Scotland's 21-year target is far too long, and Ireland should aim to eradicate energy poverty much sooner than 2040.*)

- A duty on Ministers to produce a long-term Strategy outlining how delivery of the 2040 target will be achieved;
- A duty on Ministers to produce a monitoring report every 5 years;
- The establishment of an independent fuel poverty advisory panel.

In setting a definition of ‘energy poverty’, regard should be had with the ability of persons to consistently achieve a minimum temperature conducive to health and well-being in their homes, reflecting that this will be different depending on the population in question, such as for older persons. For example, employers have requirements to ensure minimum temperatures such as 17.5° for sedentary work.¹⁰ While not suggesting this is a suitable temperature for everyone, especially for those who are frail or have health requirements for higher temperatures, the approach to fuel poverty should include regard to the objective temperatures achieved in people’s homes. Sample-based research and use of smart thermometers should allow the generation of data on the lived reality of temperatures in the homes of people on low incomes. Consideration should also be given to the length of time people spend at home during the day.

Evidence should be built up on poverty and affordability in Ireland generally and across demographics. Age Action has called for the Government to commission a ‘Cost of Ageing’ study, modelled on the Cost of Disability study published earlier this year, which would provide a detailed evidence base about the full extent of the cost of living faced by older persons at different ages as well as when faced with different illnesses or other issues associated with older age.

There are many important topics of research under the heading of energy poverty, and likewise there is useful data to be collected. Enough data needs to be gathered to conduct an effective Social Impact Assessment of measures pursued under the Action Plan, which wasn’t possible under the previous strategy. However, Age Action would highlight that there is a wealth of pre-existing research on just this, which the government can collate and build on. We already know a lot about who is most at risk of energy poverty and who will be most hurt by the cost-of-living crisis. We have information on the people who use solid fuels, who live in low BER homes, and who have low incomes. Replicating information or initiating unnecessary research efforts could delay the realization of vital measures. Instead, insofar as is possible, the Action Plan should be designed and implemented on foot of already available information.

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

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https://www.hsa.ie/eng/publications_and_forms/publications/general_application_regulations/gen_apps_workplace.pdf

Recommendations on Income Adequacy

In our joint letter on energy poverty, Age Action supported measures being taken that target income inadequacy generally, which will of course in turn alleviate energy poverty. These include:

- Increase rates of all core social welfare payments by at least €20 per week.
- Pay all social welfare recipients a Christmas Bonus-style double welfare payment, before the end of October at the latest.
- Introduce a cost of disability payment of €20 per week.
- Raise the Increases for Qualified Children (IQCs) payment by €7 for children under 12, and €12 for children aged 12 and over 6.

Social welfare core rates should also be fully indexed against the growth of average earnings and inflation.

Older Persons and Energy Poverty

What follows is information on older persons and their experience of energy poverty to inform the Action Plan.

Most older persons have no capacity to raise their incomes. Many experience declining income and most have little or no cash savings. After a lifetime of contributing to society, it is right for the government to protect those who have no other way of coping with soaring living costs, especially for energy. Home heating oil is now 144% more expensive than it was two years ago (April 2020 to 2022) and 89% more expensive than it was in December 2016. Income inadequacy means that many older persons have no choice but to go without essentials like heating or a protein-rich meal, resulting in poorer health outcomes and lower life expectancy.

Even before the recent period of high price inflation, one in eight older persons was unable to afford a meal with meat, chicken or fish every second day. One in 20 was unable to afford to have family or friends to their home for a meal once a month. Nearly a third of single adults aged 65+ would be unable to face unexpected financial expenses, as would one in five older couples.

Curtis et al (2014) found that 45% of older persons (60+) lived in properties with a BER of E, F or G. This rises to 57% for people aged 75 or older.¹¹ From this, we can estimate that 60% of low BER homes (E, F or G) are occupied by older persons, who are therefore in a uniquely negative position relative to the cost of home heating.

Older Persons, Health, and Warm Homes

The relationship between poor housing and poor health is mutually reinforcing: poor housing can worsen a person's health,⁵⁴ and health issues can lessen people's ability to live safely in and maintain their own homes and may make traditional housing inadequate

¹¹ John Curtis et al, 'Estimating Building Energy Ratings for the Residential Building Stock: Location and Occupancy' ESRI Working Paper (2014)

to meet their specific needs. This can be especially true for older persons given they on average spend more time at home.⁵⁵ Housing that is inadequate, including due to energy poverty and energy inefficiency, can negatively impact both the mental and physical health of older persons. Changes in health, whether gradual and cumulative or sudden, can change a person's housing needs,⁵⁶ and it is often at this juncture in the life of an older person that the importance of having choice and control is most acute.

When it comes to the impact of housing on older persons' physical health, particular attention has been paid to those living in cold homes. The Sustainable Energy Authority of Ireland has stated that:

“As we age, our immune systems deteriorate. Cold and damp housing can lead to increased sickness including respiratory problems, colds and even hypothermia. Therefore, in colder weather, keeping yourself in a warm environment with good air quality is essential to staying healthy. Many older houses in Ireland are not energy efficient. They perform poorly when compared to those built to the current building standards. In particular, rooms in older houses tend to have drafts unless the home has undergone an energy upgrade.”

Older persons disproportionately occupy energy inefficient homes. Research from 2016 found that persons aged 50 or older occupying cold homes had lower self-rated health and were more likely to report chronic pain.¹² In 2012, colder homes were associated with higher levels of chronic illness among older persons.¹³ More than one in eight persons aged 65+ (13.1%) live “in a dwelling with a leaking roof, damp walls, floors or foundation, or rot in window frames or floor”.¹⁴ Other health issues may result or be exacerbated by the presence of mould, damp, or mildew in the home. Poor housing is strongly associated with higher rates of respiratory health problems and bone and joint problems among persons aged 55 and older in Ireland.¹⁵ Housing issues, and specifically inadequate heating, make persons aged 50 or older twice as likely to report symptoms of depression.¹⁶

Energy Poverty and Transport

Inadequate transport is a serious issue for Irish society, especially for older persons. While there are many barriers to full use of transport, one of these is the cost of fuel. Similar to how many older persons will be unable to afford to retrofit their homes, many will be unable to upgrade to an electric vehicle and will remain dependent on fossil fuels for transport. The Energy Poverty Action Plan should not be limited to matters of home

¹² TILDA, 'Housing conditions of Ireland's older population' (2016) p16, 18.

¹³ Noëlle Cotter et al, 'Coping with the cold – exploring relationships between cold housing, health and social wellbeing in a sample of older people in Ireland' (2012) Quality in Ageing and Older Adults, p38.

¹⁴ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=ilc_mdho01&lang=en

¹⁵ Sarah Gibney et al (2018) 'Housing conditions and non-communicable diseases among older adults in Ireland' 19 (2018) Quality in Ageing and Older Adults p191.

¹⁶ TILDA, 'Housing conditions of Ireland's older population' (2016).

heating, but also look at alleviating the cost of transport, particularly for low-income households and those living in isolated rural areas. Consideration should be given to expanding the Free Travel Scheme to make it more useful to people in rural areas, such as allowing a certain number of taxi journeys per annum using the scheme. The Government needs to invest more in rural public transport, to both increase frequency and to provide services where there are none. Flexible forms of rural transport are also needed, not least to help people travel the final distance between their homes and bus/rail stops.

For some households, there will also be an overlap between home energy and transport energy, when people charge electric or plug-in hybrid cars at home, and this form of energy use needs to be factored into energy poverty.