



## Submission on the Draft Clean Air Strategy for Ireland.

May 2022



Rialtas na hÉireann  
Government of Ireland



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government supporting communities

*The Scheme to Support National Organisations is funded by the Government of Ireland through the Department of Rural and Community Development*

## Introduction

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.

Air quality impacts older persons in Ireland significantly, especially those who are reliant on solid fuels and those who live in areas with a high concentrations of air pollution. Measures taken to improve air quality, such as the creation of the Clean Air Strategy for Ireland ('the strategy') are welcome. However, there is also a risk that new policies put in place to improve air quality will have negative unintended consequences, particularly on those currently dependent on solid fuels for home heating. Therefore, actions taken to improve air quality must be just and equitable and should be rolled out alongside the provision of supports to assist people to move away from reliance on solid fuels for home heating.

## Do you agree with the five strategic priorities outlined in the draft strategy?

Age Action agrees with the spirit of the draft strategy and its strategic priorities. However, greater specificity throughout is required. There already exists much research on and insight into air quality issues in Ireland. What is needed are clear step-by-step plans for the government, state agencies, and local authorities to achieve ambitious targets in making Irish air clean. Likewise, monitoring and review mechanisms need to be implemented to ensure the effectiveness of the strategy. There need to be means for individuals and communities to hold to account public agencies and the Government with regards to the implementation of the strategy.

## Do you feel there are additional strategic priorities which should be included?

In line with Ireland's commitment to the Sustainable Development Goals and a just transition, Age Action recommends a further strategic priority regarding the promotion of equality, leaving no one behind and prioritising those furthest behind. This additional strategic priority needs to be a guiding principle for actions taken under the strategy. Measures that improve air quality cannot create disproportionate costs or risks for certain segments of society, much less those already socially or economically disadvantaged. For example, as of the 2016 census, 7.6% of homes headed by an older person relied on peat or turf for home heating, 6.1% relied on coal, and 2.1% relied on wood. One in fifty homes headed by an older person had no central heating. At the same time, most older persons have modest or low incomes and a low level of savings, which makes retrofitting or changing heating systems unaffordable for many.

In the case of older persons, Age Action is calling for two measures to be implemented to ensure the strategy puts the furthest behind first and leaves no one behind:

- An Energy Guarantee for Older Persons. This social welfare measure provides support to older persons in covering the costs of their home heating. It differs from and improves on existing measures in two key ways. Firstly, in determining eligibility, it takes into account not only income level, but house type, fuel type, and Building Energy Rating (BER). This means that the many older persons who may be on a moderate income, but living in a low BER home and/or using inefficient fuels, are no

longer excluded from accessing assistance to keep their homes warm. Secondly, this measure would provide older persons with a cash payment benchmarked and indexed against the current cost of energy. This means they are guaranteed a certain number of units of energy, instead of a fixed monetary amount that gets them more or – more likely – less as prices fluctuate. A more detailed overview of this policy proposal is available through our website.<sup>1</sup>

- An expanded Housing Aid for Older People Grant. If the government wishes to limit and reduce solid fuel burning, they must remove barriers faced by older persons in transitioning to other fuel types. The current Housing Aid for Older People Grant can cover partial costs for the installation of a central heating system. This should be transformed into a systematic programme that offers central heating systems to those households who can't afford them. This new system can rely on the already in place structures and processes through which the general housing aid grant is delivered. If current funding cannot meet demand, it could be enhanced by carbon tax revenue which has been ringfenced for measures combatting fuel poverty. As the grant is delivered by local authorities, this funding could be made available to local areas and communities most dependent on solid fuels and therefore furthest behind in relation to achieving clean air. Specialized eligibility criteria and grant sizes in respect of central heating system installation should be established to ensure no one falls through the cracks. As this scheme is being rolled out, temporary licences could be issued to households dependent on burning turf to allow them to continue to do so while awaiting installation of a central heating system.

Furthermore, Age Action believes the right to breathe clean air should be a stated priority of the strategy, and making Irish air clean to an objective standard, rather than “cleaner”, should be the stated aim. The strategy should also call for a comprehensive new Energy Poverty Strategy. This should also endorse an Energy Guarantee for Older Persons and an expansion of the Housing Aid for Older People Grant.

The involvement of communities is vital to the design of policies that may impact them. Any measures taken under this strategy, at national or local level, should follow appropriate engagement with and participation by relevant communities such as older persons. In accordance with the right to participate in decisions on environmental matters provided by the Aarhus Convention, the engagement should be early and effective. Effective in part means that the engagement accounts for the needs of the relevant public. Age Action found that 65% of persons aged 65 or older do not use the internet or have below basic digital skills. Engaging with older persons must therefore provide for offline options, such as in person consultations or submissions via post. In the latter case, time must be allowed for the sending and receiving of letters.

### **What do you feel are the most important current and emerging air quality issues in Ireland that require further research?**

It is important to effectively identify communities who are at risk of being disadvantaged by measures promoting clean air. This will include the profile of persons dependent on solid fuels for home heating. 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 being left behind in the transition away from carbon dependency. 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 strategy should be designed and implemented on foot of already available information.

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<sup>1</sup> [https://www.ageaction.ie/sites/default/files/age\\_action\\_energy\\_guarantee\\_for\\_older\\_persons.pdf](https://www.ageaction.ie/sites/default/files/age_action_energy_guarantee_for_older_persons.pdf)

## **What issues might a national clean air awareness campaign encompass and how could its impact be measured?**

Ensuring people are aware of the supports available to them to transition away from solid fuel dependence is vital to the success of this strategy. Older persons would be an important target for this campaign and many of them do not use the internet. This campaign would thus need to be conducted through both digital and non-digital means. Should the strategy provide for an expanded Housing Aid for Older People Grant, for example, local authorities could distribute posters, letters, or otherwise engage directly with older persons to inform them that they may be eligible for a central heating system. Impact could be measured by increased uptake in pre-existing schemes as well as success of new schemes introduced under the strategy.

## **Are there any other comments you have in relation to the draft national Clean Air Strategy?**

The strategy should be put on legislative footing to ensure its strength and a whole of government approach. It should replace the 1987 Air Pollution Act and strengthen enforcement powers for local authorities. The strategy should further provide for additional funding and training for local authorities.

Crucially, the strategy should be positioned and conceptualized as part of the already existing policy and legislative framework on human rights and climate justice. This includes national and international commitments, such as the United Nations Framework Convention for Climate Change; the Paris Agreement; the Sustainable Development Goals; and the Climate Action and Low Carbon Development (Amendment) Act 2021.

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