



Recommendations for Ireland's Energy Poverty Strategy

Access to adequate levels of energy is a precondition to the realisation of many rights, impacting our lives, health and living standards. It is furthermore essential to social inclusion and is increasingly connected to employment opportunities in Ireland. It is essential therefore that energy poverty is addressed through a rights-based approach. A rights-based approach clarifies the accountability of government (at all levels) to people, particularly, marginalized and vulnerable groups. As energy poverty is a multi-dimensional problem, connected to the housing, cost-of-living, and climate crises, it requires a multi-dimensional response. However, Ireland currently lacks a comprehensive framework to accurately measure, monitor and tackle energy poverty. The former Energy Poverty Strategy lapsed in 2019, three years ago, and a review of the implementation of the former Energy Poverty Strategy is awaited.

We call upon the Government to: (1) publish its review of the implementation of the 2016-2019 Energy Poverty Strategy as a matter of urgency, and (2) develop a new Energy Poverty Strategy and provide public consultation on the Strategy ahead of this winter.

We provide the following guidance for the development of a new Energy Poverty Strategy:

1. A Whole-of-Government Approach:

- i. Place the Strategy on **statutory footing** to ensure policy coherence and a whole-of-government approach. The Strategy will require cooperation in particular between the Department of Environment, Climate and Communications; the Department of Social Protection; the

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

2. Improve Data Collection:

- i. 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.
- ii. 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.
- iii. 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.

3. Monitoring and Evaluation:

- i. 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 Strategy 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.

4. Public Participation:

- i. Those with lived experience of energy poverty must be included at all stages in the design and delivery of a new Energy Poverty Strategy. The Department must ensure that the Strategy is afforded appropriate and inclusive public consultation and must ensure to reach those with lived experience of energy poverty.

5. A Rights-Based Approach:

- i. We recommend the consultation and collaboration with relevant anti-poverty, housing, Traveller, Disabled People's Organisations, health, community, social justice and human rights bodies, and to provide seats for such bodies on the Energy Poverty Advisory Group, to ensure the Strategy is fully poverty and equality-proofed.
- ii. 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.

6. Aligned with Climate Justice

- i. We recommend that the new Energy Poverty Strategy 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.

7. Commit to delivering an Energy Poverty Act in 2023:

- i. To ensure accountability and long-term political commitment towards the eradication of energy poverty, the Strategy 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. A new definition and measurement framework for fuel poverty;
 - b. 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; *(It is our view that a 21-year target is too long, and that Ireland should aim to eradicate energy poverty much sooner than 2040.)*
 - c. A duty on Ministers to produce a long-term strategy outlining how delivery of the 2040 target will be achieved;
 - d. A duty on Ministers to produce a monitoring report every 5 years;
 - e. The establishment of an independent fuel poverty advisory panel.

