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**Consultation on the Revised Energy Poverty Action Plan**

**​​Submission to the Department of the Environment, Climate and Communications**

**May 2024**

1. **Introduction and context**

**Introduction**

DFI welcomes the opportunity to make a submission to the consultation on the revision of the Energy Poverty Action Plan. DFI is a federation of over 120 member organisations working with people with disabilities to implement the UN CRPD and ensure their equal participation in society. Our submission reflects concerns of our members and the disabled people in the community they work to support.

Apart from making this submission, DFI also endorses the submissions of civil society groups with expertise in this area, including anti-poverty organisations like Saint Vincent de Paul and the MESL Research Centre, and the joint submission from civil society, of which we are a contributing member.

**Context: Disabled people live in significant deprivation**

Disabled people, and those with ongoing health conditions or problems, are substantially more at risk of poverty and deprivation in Ireland. The cost of living crisis exacerbated the existing economic vulnerability faced by this cohort of people, many of whom rely on a weekly Disability Allowance payment of just €232 a week.

Annual poverty statistics show that people with disabilities consistently have amongst the highest rates of poverty and deprivation in Ireland. While the exact percentages change a little annually, year after year the data shows that disabled people who are unable to work frequently cannot afford the basic essentials in life.

* EU SILC data show that while on average 28.8% of the EU population with a disability were at risk of poverty or social exclusion (AROPE) in 2022, Ireland’s rate was more than 10% higher, at 39.5%.
* Ireland ranks 22nd of the EU 27 on disability poverty, despite being one of the wealthier EU states.[[1]](#footnote-1)
* The 2023 CSO SILC data show an increase in deprivation last year, and an almost static rate of consistent poverty:[[2]](#footnote-2)
  + 16.5% of people unable to work due to long-standing health problem (disability) live in consistent poverty, compared to the national average of 3.6%.
  + Almost half (44.7 %) of people unable to work due to long-standing health problem (disability) live in deprivation, unable to afford some basic essentials.
  + 27.3% of people unable to work due to long-standing health problem (disability) live at risk of poverty, compared to 5.8% of employed people, and 8.8% of those who are retired.

The 2023 Deprivation data in particular shows that:

* 16.1% of people unable to work due to long-standing health problems (disability) are unable to afford to keep the home adequately warm, compared with 5% of employed people or 4.5% of retired persons.
* 3 in 10 (27.7%) people unable to work due to long-standing health problem (disability), went without heating at some point in the last year, compared to 1 in 10 (10.8%) nationally.
* The percentage of people unable to work due to long-standing health problem (disability) who went without heating increased rapidly last year – from 14.5% in 2022 to 27.7% in 2023.

**The extra Cost of Disability, inflation and energy usage**

The increase in energy costs in recent years has been devastating for disabled people, who already struggle with poverty. For someone who must use electricity to charge a power wheelchair, assistive technology or essential medical equipment, there is no way to mitigate against the costs or reduce energy consumption. For example, a person with muscular dystrophy may rely on 3 energy-intensive machines to breathe - a bipap machine, an humidifier and an oxygen concentrator. This energy consumption requirement continues year-round, it does not decline in the summer months. Last year some customers caring for disabled family members (many of whom survive on the Carers Allowance) received energy bills of €600 or more.

Moreover, disabled people live with a range of extra costs, meaning they have significantly more expenditure compared to others due to their disability, as well as a low income if they rely on our social protection system to survive. The 2021 Indecon report on the Cost of Disability, commissioned by the Department of Social Protection, provides significant policy evidence that people with disabilities have extra costs across a number of areas including mobility, transport, and communications, care and assistance services, equipment, aids and appliances, energy and heating, and medicine.[[3]](#footnote-3) The report indicates extra costs in the range of €8,700-€12,300 per year. The estimates provided in the report are based on data from 2020 and, in some cases, significantly earlier, and thus will have escalated significantly in recent years. The Consumer Price Index Inflation (CPI) Calculator, for example, shows inflation of 19.5% from January 2021 to March 2024.[[4]](#footnote-4) If we were to apply the CPI to the original Indecon estimate for the extra disability costs, it has likely increased to within the range of €10,397 – €15,177.

The Indecon report also reflects the SILC data on deprivation above, notably showing that disabled people:

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

The above statistics were based on CSO figures from 2003/2007-2017, so these figures are likely to have increased substantially, especially over the past year.[[5]](#footnote-5) Even three years ago, before the current price increases, SVP found that 42% of people unable to work due to illness or disability reported going without heating due to cost.[[6]](#footnote-6) As this year’s SILC energy deprivation shows, despite one-off supports in recent years, things are not improving, and people unable to work due to illness or disability continue to go without heating frequently, in spite of the likely impact on their health.

1. **Consultation Questions**

**Implementation of Legal Framework**

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

The EU definition is a strong and comprehensive definition. In particular DFI welcome that it acknowledges factors such as health, geography and specific energy needs, and that it specifically mentions the higher energy needs of people with disabilities and the resultant increased risk of energy poverty. It is also welcome that the EU definition acknowledges intersectionality, and structural inequalities in income distribution, as well as socio-economic status and gendered care issues. Any national definition should retain these strengths of the EU definition.

Overall it is important to understand that energy poverty is to a great extent a factor and subset of poverty and income inadequacy generally, and to recognise this in any definition. Any definition should ideally identify specific sub-groups that are most at risk of poverty, including disabled people, and understand that certain cohorts of society will have higher than average energy usage requirements.

**Meeting the Cost of Energy**

**1. What barriers do you believe are preventing customers from accessing affordable and reliable energy services?**

The most fundamental barrier that is preventing individuals from accessing sufficient energy is insufficient income. While the area of energy poverty has been thrown into relief in recent years as huge price increases affected everyone, energy poverty has been an issue for many years. Disabled people would say that they have lived with a cost of living crisis for all of their lives.

A huge barrier to accessing energy services for those relying on social protection payments is the insufficiency of many of those payments, which do not provide people with an income above the poverty line, or adequate to provide a Minimum Essential Standard of Living. Another related barrier is the means-testing aspect of certain payments, along with a lack of social protection individualisation, meaning a disabled person may miss out on certain supports due to living with a family member, partner, or with other housemates who are earning.

Another issue is the insufficient support provided to disabled people regarding the extra Cost of Disability (see section above on this), which for many leads to higher consumption of energy.

1. **Which groups do you consider have not received enough support, up to now?**

People with disabilities, and households with disabilities, have not received sufficient support up to now, despite being more at risk of energy poverty. While some people in receipt of Disability Allowance also receive fuel allowance, it is important to remember that not all do – only 50% or so receive it. Moreover at the most fundamental level our social protection rates do not provide people with sufficient income to pay for all essentials. It is deeply worrying, from a health point of view, that people unable to work due to long standing health problems/disability are going without heating due to cost – the health implications of this are troubling, and addressing worsening health as a result of this deprivation will ultimately cost the state more in the future.

The energy credit was greatly welcomed by disabled people and their families, and brought some relief. However it would have been much more effective and efficient to spend the money used on a universal credit, given to many account owners who didn’t need it, to give larger and specifically targeted extra supports to those most in need and living in energy poverty and deprivation, rather than spreading resources thinly across the whole population.

While the one-off payments were a welcome immediate support, people with disabilities are still ultimately left with a real-term cut in their overall social protection income due to inflation in recent years, without prices decreasing back to pre-crisis levels.

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

As indicated above, more specific and carefully targeted actions are necessary, across government Departments.

Overall, the government should consider rolling out a social tariff for energy/energy guarantee scheme as per the recommendations of various civil society organisations (including Age Action, SVP and MESL Research Centre) and policy publications in recent years.[[7]](#footnote-7) Any guarantee or social tariff should take account of people with disabilities’ higher energy needs and factor this in when setting the amount of units covered by such a guarantee.

Specifically for disabled people, the following further actions would be positive:

**Poverty and Social Protection**

* Increase social protection rates to an above the poverty line rate that also provides for the Minimum Essential Standard of living. Social protection rates should be indexed, to both inflation and wage growth.
* Introduce a €40 weekly Cost of Disability payment
* Expand the Fuel Allowance to provide it to all people on a disability-related social protection payment. The expansion of the Fuel Allowance to over 70s last year clearly had a positive impact on poverty levels, so this should now be extended out further to groups like disabled people who are most at risk of energy poverty.
* Restore the purchasing power of the Fuel Allowance as per recommendations of SVP, MESL and other organisations.
* Provide a higher level of Fuel Allowance all year round for those with higher energy usage due to a medical and/or disability need – for example people with polio, huntington’s, cystic fibrosis, muscular dystrophy etc.
* Review, analyse and strengthen the provision of the Heating Supplement, particularly in the context of the Indecon report. Increase awareness of this support in the community.

**Buildings and Energy Efficiency**

* Strengthen and further develop the provision of micro-generation solar panels to households on the vulnerable customer register. Track and report on progress, and expand this programme over time, building on learnings. Engage with disability organisations to support and raise awareness of this scheme, to increase take-up. Potentially this can be expanded to people in receipt of disability related social protection payments into the future.
* Ramp up the delivery of the Warmer Homes Scheme, and consider prioritising those with a disability or health need for speedy delivery of the scheme.
* At present the Warmer Homes Schemes is only available to someone in receipt of Disability Allowance for over six months who has a child under seven years of age. Eligibility should be expanded to any recipient of Disability Allowance or other disability-related social protection payments, given the high risk of energy deprivation and the negative health impacts of this.
* Support the development of criteria that factors in the health impact of energy poverty on individuals and households, into the retrofitting prioritising process of the SEAI (and increase resourcing to the SEAI to enable this)
* Provide increased retrofitting and other grants to disabled people who own their own homes, in recognition of their greater risk of energy poverty, and the many extra costs they live with.
* Increased support to Local Authorities to work on Energy Poverty at county level.

**Customer Supports and Regulation**

* Further strengthen the ongoing campaign to make customers, and organisations that support them (such as members of DFI) aware of the ‘vulnerable customer’ register and ensure all people entitled to be on this register are on it.
* Resource the CRU (or some other relevant body) to undertake research to further understand the background and circumstances of those in energy arrears, in order to more carefully target supports to those who are in arrears.
* Link in more directly with disability organisations, and other groups working with those groups more at risk of energy poverty, to ensure sufficient supports are in place. Resource these groups to specifically work on energy poverty.
* Increased support to local support organisations and networks across the countries – PPNs, Citizens Information, MABs etc.

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

The current Energy Poverty Action Plan was not sufficiently forward-looking or detailed, and it also doesn’t go into sufficient depth about the groups most at risk of energy poverty, and the specific supports they may need. It also doesn’t have measurable energy poverty reduction targets. Another key gap is the lack of an explicit role for civil society, independent policy/academic and lived experience input into the governance and monitoring structures.

To address these gaps the revised Energy Poverty Action plan should:

* Have more detailed sections focusing on the specific context, challenges and supports needed by groups most at risk of energy poverty.
* Have measurable annual poverty reduction targets, both national average but also for at risk sub groups, like people with disabilities.
* Have mechanisms to engage with these groups regarding their needs, including potentially, for example, hosting focus groups specifically targeting people with disabilities and their families.

1. **Are there specific programs or initiatives from other countries that you think could be effective in reducing energy poverty in Ireland?**

An exercise examining best practice on energy poverty would be welcome. Other organisations that are better resourced to work on energy poverty have provided specific recommendations in their submissions, which we support. We also note the work at EU level of the Energy Poverty Advisory Hub.

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

As previously outlined, the micro-generation scheme for people on the vulnerable customer register is very welcome. Any focus on smart energy solutions must consider literacy and numeracy, and those with intellectual disabilities and/or additional needs, to ensure they are accessible to all. Many disabled people would and do benefit from smart homes already, and smart solutions that support their specific disability. Any smart solutions must be disability-proofed.

**Energy Efficiency**

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

Where retrofitting is happening in social housing that disabled people live in, sufficient consultation on the approach must takes place. Any adaptations must adhere to Universal Design++ and leave buildings fully wheelchair liveable - DFI has heard from individuals who are wheelchair users or mobility impaired who have been dissatisfied with the impact of a heat pump installed in their social housing, leading to reduced ground space available to them, and causing difficulty. Disabled tenants should be consulted and involved in the design process of any retro-fitting of their homes.

As regards the grants currently provided to support the installation of solar panels, DFI is concerned that most disabled people cannot afford the outlay involved in installing such panels, given low employment and income rates, and the many extra costs they have. A scheme should be developed that offers free or highly subsidised solar panels to people with disabilities.

Significantly increased provision of solar panels should also be provided in social housing, particularly housing occupied by people with disabilities and their families.

1. **Government is acutely aware of the need to balance support available under the Warmer Homes scheme and the waiting times for that support. Do you think the scheme could be adapted in way to better target the support so we can achieve this balance?**

The Warmer Homes Scheme should be ramped up significantly, with more resources provided to the SEAI to deliver change now. This is an investment in our future and will cost less long term.

Apart from the recommendations below, it is important also to consider cliff edges – for example an individual can be just over the Fuel Allowance limit due to living with others, or a person on Disability Allowance may have a child who is 8 (or who ages out while waiting for the scheme). Evidence shows that households that have a disabled family member are poorer, and our provision should acknowledge and support this.

See also our previous recommendations above:

* Ramp up the delivery of the Warmer Homes Scheme
* At present the Warmer Homes Schemes is only available to someone in receipt of Disability Allowance for over six months who has a child under seven years of age. Eligibility should be expanded to any recipient of Disability Allowance or other disability-related social protection payments, given the high risk of energy deprivation and the negative health impacts of this.
* Support the development of criteria that factors in the health impact of energy poverty on individuals and households, into the retrofitting prioritising process of the SEAI (and increase resourcing to the SEAI to enable this.

1. **The Government has put in place several supports for landlords, to upgrade the efficiency of their rented properties. Are there other measures that the Government could take that you think would further support upgrades in the private rented sector?**

Many disabled people find it extremely hard to rent on the private market, due to landlord prejudice, low income and employment prospects, and very low levels of fully accessible housing in the private market. Landlords who own accessible properties should be particularly incentivised for upgrading their energy efficiency. Approved Housing Bodies should be provided with specific and increased retrofitting and energy efficiency supports, given then extent to which they provide specialised housing supports.

**Research**

1. **What best practice regarding research on energy poverty (e.g. dissemination, public engagement, mechanisms for continuity) should we consider?**

Research on energy poverty should actively involve organisations working with communities most associated with energy poverty, and those with lived experience. The NDA has recently developed guidelines on engaging disabled people in research projects.[[8]](#footnote-8) New research that is supported by government funding should engage with relevant civil society organisations working on energy poverty, including them in advisory processes also to ensure the research is fully relevant in practice.

Civil society organisations like DFI are not resourced to undertake research (or indeed significant policy or advocacy work – at present we are drawing on our existing, quite limited, resources, to undertake this work) on energy poverty – the government might consider setting up a fund to enable and support this, to further strengthen the evidence base on particular at risk groups.

1. **Besides the Economic Social Research Institute’s (ESRI) research programme into Energy Poverty, which generally covers measurement and targeting, what other areas do you think should be investigated/researched?**

More research on the specific needs and experience of specific subgroups who are more likely to experience energy poverty, such as people with disabilities, would be welcome. This could also support more efficient and targeted energy poverty actions and solutions.

More research on the public sector cost of energy poverty (modelled on the SVP cost of poverty research[[9]](#footnote-9)) and on the return on investment in, for example, providing the Warmer Homes Scheme or other supports, would be insightful.

More detailed analysis of the SILC data on deprivation would also be very useful and interesting, as would more research on the utility, effectiveness and impact of recent measures to address the cost of living (potentially both using SILC data and/or the ESRI’s SWITCH model) – including the universal energy credit, and the cost of living one off payments would also be worth investigating.

A research programme for civil society organisations would also be very welcome, as many are not resourced to undertake significant research, despite having significant on the ground knowledge of the issues.

1. **The ESRI will provide metrics to measure the number of people experiencing energy poverty and the impact of it on them. In your view, what specific indicators will be helpful in monitoring the success of the Energy Poverty Action Plan over time?**

While the ESRI research programme will certainly be interesting, metrics and indicators will be required for the duration of the Energy Poverty Action Plan. The Department might refer to the useful and informative tracking of data through the Roadmap for Social Inclusion Progress Reports as one example of indicator tracking - although a traffic light system for indicators might also be useful, to draw attention to indicators where progress is not being made.

Tracking the annual SILC Poverty and Deprivation, notably the heating related, indicators will be essential, as will tracking both the numbers and percentages of people experiencing various forms of poverty. Comparative data at EU level will also be important to track. For both national and EU data the focus should not be just on national averages, but on the poverty and risk levels for the groups most at risk of energy poverty.

Other indicators to track should include:

* the number of micro-generation solar panels provided to people on the vulnerable customers register, and % take-up of the offer.
* the value of the Fuel Allowance and other relevant social protection payments, relative to the cost of living, inflation and increases in wages nationally.
* The number and % of people in utility arrears at a given point of time, and over 12 months, and the economic background of people who are in arrears.
* The % and number of people living under the poverty line in Ireland.
* the number of retrofits delivered to AHB housing units, and in social housing – including the number delivered where the tenant has a disability or health condition.
* the unit price of energy that different actors are paying – individuals, corporations etc.

**Communications and Governance**

1. **How can we better communicate our work in the area of Energy Poverty to all stakeholders?**

Communication is essential and can always be strengthened. The Energy Poverty Stakeholders’ Forum last year was a welcome, open and engaging process, as is this consultation, and the timing and duration of it. The Department might consider developing an energy poverty stakeholders consultative forum, that could meet on a quarterly basis – it could provide verbal and written updates there, and hear from civil society and others in this regard. An annual report on progress and areas of focus for the energy poverty work would also be welcome and help to keep stakeholders informed.

Beyond this, a focus on public focused communications, through online, social media, traditional media advertisement etc would be welcome – for example the keeping warm and well advertisements.

1. **What suggestions do you have for ensuring the inclusion and representation of diverse voices in the development and implementation of the Energy Poverty Action Plan?**

The first Energy Poverty Stakeholder Forum last year, with its focus on listening to the voice of those with lived experience, was a good step in this direction, which will hopefully be built on in the second forum next month. However the follow up with participants since last year’s discussions has been fairly minimal.

There is a lack of representation of civil society organisations and of those with lived experience role in the implementation or monitoring structures of the Energy Poverty Action Plan, which should be addressed in this review. Perhaps there is also scope for an Energy Poverty advisory panel, and for specific more detailed consultations by theme with particularly affected groups and the organisations that work to support them.

**Policy design**

1. **In your view, how can we integrate other policies (e.g. housing, energy market regulation, income tax and income support) in our Plan to tackle Energy Poverty?**

As with other complex policy areas, an inter and cross Departmental approach is crucial to tackle Energy Poverty.

The poverty reduction role and mandate of the Department of Social Protection is clearly crucial here. This also involves input from units within this Department that work on different areas – including disability, social inclusion and the Roadmap for Social Inclusion, the household benefits package, Fuel Allowance and Additional Needs Payments, among others.

The role of the Department of Housing, Local Government and Heritage is also essential here, in terms of building standards and regulations, delivery of social housing, and also in the context of retrofitting etc. Moreover the role of Local Authorities across the country is also crucial. See above for our more detailed recommendations on a number of these areas.

Also, the role that the Carbon Tax pays in funding various anti-poverty supports is very welcome, and should be retained.

**Closing Question**

**Are there any other matters you wish to raise in relation to Energy Poverty?**

The first section of the consultation includes **Targeted Questions for Individuals/Households.** Based on feedback from our members and individuals in the community, DFI provides the following recommendations, for the questions in this section which are not covered in our recommendations above.

**Targeted Questions for Individuals/Households**

1. **What new measures could we introduce to support households in, or at risk of, energy poverty?**

See answers to questions above

1. **What existing measures could we improve or update to support households in, or at risk of, energy poverty?**

See answers to questions above

1. **What measures could we take to encourage customers to engage with their suppliers early on, to reduce the possibility of disconnection and energy debt increasing?**

* Develop and support better communications campaigns
* Link in more actively with organisations that support groups most likely to be in arrears – both community and voluntary organisations working with specific at risk groups, but also groups like the National Advocacy Service, Citizens Information Service, PPNs etc.
* Resource and provide specific advocacy supports for certain at risk customers, like those with disabilities

**4.How can we more effectively promote supports for customers in or at risk of energy poverty (e.g. vulnerable customer registration, nominated representatives, level-pay plans)?**

* There is a need for a strong, active and resourced outreach and information campaign regarding supports for those at risk of energy poverty, including the vulnerable customer register, and the hardship funds available with energy providers. DFI has found that, despite efforts, even some of its members or individuals they support were not aware of this provision.

**5. How can we more effectively promote price comparison options and information for customers, so they can obtain the cheapest energy prices to meet their needs (e.g. Price Comparison Websites)?**

**6. Would you be willing to share your personal experience in dealing with energy poverty/high energy costs?**

DFI members and the people they work with may be willing to share their experiences. This is an issue for many people with disabilities in the community.

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**DFI’s vision**

An Ireland where people with disabilities are participating fully in all aspects of society.

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**DFI’s mission**

DFI is a federation of member organisations working with people with disabilities to implement the UN CRPD and ensure their equal participation in society.

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Member organisations are actively involved in DFI, working to implement the UN CRPD and to achieve the equal participation of people with disabilities in society.

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1. <https://ec.europa.eu/eurostat/databrowser/view/hlth_dpe010/default/table?lang=en> [↑](#footnote-ref-1)
2. <https://www.cso.ie/en/releasesandpublications/ep/p-silc/surveyonincomeandlivingconditionssilc2023/poverty/> [↑](#footnote-ref-2)
3. <https://www.gov.ie/en/publication/1d84e-the-cost-of-disability-in-ireland-research-report/> [↑](#footnote-ref-3)
4. <https://visual.cso.ie/?body=entity/cpicalculator> [↑](#footnote-ref-4)
5. <https://assets.gov.ie/206636/f8e1b2af-af48-442b-9ca0-aff9efd35bd7.pdf> INDECON report, see for example ps 34, 35, 47, 59. [↑](#footnote-ref-5)
6. <https://www.svp.ie/news-media/news/one-in-four-people-report-cutting-back-on-food-and.aspx>. [↑](#footnote-ref-6)
7. For example see <https://www.budgeting.ie/publications/the-cost-of-adequately-heating-the-home/>, <https://www.friendsoftheearth.ie/assets/files/pdf/still_left_out_in_the_cold_-_full_report.pdf>, <https://www.ageaction.ie/sites/default/files/age_action_energy_guarantee_for_older_persons.pdf>. See also <https://www.nea.org.uk/social-tariff-letter/>. [↑](#footnote-ref-7)
8. <https://nda.ie/publications/ethical-guidance-for-research-with-disabled-people> [↑](#footnote-ref-8)
9. <https://www.svp.ie/wp-content/uploads/2022/09/The%20Hidden%20Cost%20of%20Poverty%20Full%20Report_2020.pdf> [↑](#footnote-ref-9)