



PAVEE POINT
TRAVELLER AND ROMA CENTRE

Submission to Department of the Environment, Climate, and Communications

Energy Poverty Action Plan Consultation

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Pavee Point Traveller and Roma Centre

Pavee Point Traveller and Roma Centre ('Pavee Point') has been working to challenge racism and promote Traveller and Roma inclusion in Ireland since 1985. The organisation works from a community development perspective and promotes the realisation of human rights and equality for Travellers and Roma in Ireland. The organisation is comprised of Travellers, Roma, and members of the general population, who work together in partnership to address the needs of Travellers and Roma as minority ethnic groups experiencing exclusion, marginalisation and racism. Working for social justice, solidarity and human rights, the central aim of Pavee Point is to contribute to improvement in the quality of life and living circumstances of Irish Travellers and Roma.

Introduction

Pavee Point welcomes the opportunity to make a submission on the [Energy Poverty Action Plan consultation](#). As minority ethnic groups, Travellers and Roma are among the most marginalised and excluded individuals and groups in Ireland. They experience stark health inequalities, poor accommodation conditions, poverty, low educational attainment and literacy levels, high levels of unemployment and intersectional forms of discrimination and racism.

Pavee Point is aware of the escalating issue of energy poverty in Ireland, and its disproportional impact on the Traveller and Roma communities. Between December 2020 and December 2021, the cost of electricity rose by 22.4% and gas by 27.7%. Energy costs are now +34% higher than December 2016.¹ Fuel poverty is a common issue among Travellers, as the Community is dependent on traditional sources of fuel, such as turf or wood, to heat their homes. Other common and inefficient heat sources are gas cylinders and electric heaters. In fact, a 2019 report by Traveller MABS revealed that all Traveller clients of the service were in fuel poverty with the average percentage of household disposable income taken up by fuel costs amounting to 21%. This is double the 10% measure for fuel poverty.²

It is essential therefore that energy poverty in Ireland is addressed through a [rights-based approach](#). A rights-based approach clarifies the accountability of government (at all levels) to people, including a focus on marginalised and minority ethnic groups. As energy poverty is a multi-dimensional problem, it requires a multi-dimensional response. A rights-based approach can facilitate coherence and coordination across law and policy, enabling an integrated and whole-of-government approach. This is essential, given that energy poverty falls within the remit of multiple Departments – Environment, Climate and Communications; Health; Housing, Local Government and Heritage; and the Department of Social Protection.

In addition to the Energy Poverty Action Plan Consultation, Pavee Point has endorsed the Community Law and Mediation Centre's set of [recommendations for a new Energy Poverty Strategy](#). In addition to our organisation, these recommendations were also endorsed by Age Action, Clondalkin Travellers Development Group, Community Work Ireland, Fridays for Future, FLAC, Friends of the Earth Ireland, Independent Living Movement Ireland, the INOU, The Irish Heart Foundation, the Irish Rural Link, the Irish Traveller Movement, the Jesuit Centre for Faith and Justice, National Traveller MABS, the Northside Partnership, Not Here Not Anywhere, The Society of St Vincent de Paul, TASC and Threshold.

1. 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.

- a. **Address Barriers to Retrofitting:** A recent report by Friends of the Earth Ireland found that the policy design and finance options of retrofitting are not sufficiently tailored to the needs of Travellers.³ We recommend that the Government adopt targeted measures to ensure that Travellers living in all types of accommodation – private rented, local authority, halting sites, etc. – can avail of energy upgrades and SEAI grants.
- b. **Target Energy Poverty Within the Traveller Community:** Currently, Travellers in trailers cannot avail of any energy upgrades or SEAI grants, despite 77% of Travellers living in energy poverty (before the current energy crisis began). SEAI support should be targeted

¹ [Doubling of €100 credit for electricity bills on cards to help with rising costs](#)

² [Accommodating Ethnicity: Addressing Energy Poverty among Travellers Living in Mobiles Homes and Trailers](#)

³ [Friends of the Earth Ireland, 2022. Blockages to Retrofitting and Heat Pump Installation in Ireland](#)

to reach the Traveller Community.⁴

- c. **Revise the Trailer Loan Scheme:** The current trailer loan scheme for Travellers should be replaced with a new trailer rental scheme to ensure increased financial support, better account taken of family size, and measures to ensure a better standard of trailer can be purchased. Rental Scheme and Rent to Buy options should be provided.⁵ Trailers should be built to a residential standard in terms of heating and insulation, with a rating system similar to BER being adopted.
- d. **Local Community Energy Advisors:** Deploy Local Community Energy Advisors throughout every local authority to engage with Traveller and Roma communities who would most benefit from energy upgrades. This should be done in partnership with local Traveller and Roma organisations already working in the area.⁶
- e. **Amend the Warmer Homes Scheme:** The Warmer Homes Scheme should be revised to cease the installation of fossil fuel boilers in homes receiving energy upgrades. Energy efficiency, such as retrofit, and the installation of heat pumps, should instead become the primary agenda of the Scheme.⁷ The Netherlands have banned fossil fuel boilers and heat pumps will become the standard for home heating from 2026.⁸
- f. **Retrofit Ireland's entire social housing stock:** The commitment within Ireland's current National Retrofit Plan to retrofit 36,500 social homes over the decade amounts to approximately 20% of Ireland's social housing stock. If we are to reach the furthest behind first and undertake a national retrofit programme in accordance with the principles of a Just Transition, Ireland's entire social housing stock should be retrofitted to a B2 standard this decade.

2. 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.

- a. **Ban Evictions and Introduce Rent-Freeze:** Immediately reinstate the ban on evictions and rent freezes which were introduced during the Covid-19 lockdown until at least Summer 2023.
- b. **Provide grants to retrofit worst-performing homes in the Private Rental Sector:** Pavee Point supports Threshold and St Vincent de Paul's recommendation to provide for homes in the private-rental sector reliant on HAP with funding equivalent to the 'Better Energy Warmer Homes Scheme.'⁹ This would be a step towards addressing the "split-incentives" issue between landlords and tenants. To avoid "renovictions," (i.e., an eviction which is carried out to retrofit a rental unit) long-term leases and rent-control must be mandatory.
- c. **Develop a Tailored Retrofit Plan for the Private Rental Sector:** with clear milestones, targets, and funding. Also, introduce new grants for deep retrofits for landlords in the private rental sector on the condition that long-term leases and rent control are guaranteed to tenants.
- d. **Adopt Rent Affordability and Enforcement Mechanisms:** in line with the obligations set out in the UN's International Covenant on Economic, Social and Cultural Rights, which provide that: "*Financial costs associated with housing should not threaten or compromise the attainment and satisfaction of other basic needs (for example, food, education, access to*

⁴ [National Traveller MABS, 2019. Accommodating Ethnicity](#)

⁵ [CLM Report on Caravan Loan Scheme](#)

⁶ [SVP, 2022. Foundations for an equal Ireland - Pre-Budget Submission 2022](#)

⁷ [Friends of the Earth Ireland, 2022. Blockages to Retrofitting and Heat Pump Installation in Ireland](#)

⁸ [Shrestha, P. 2022. Dutch homes will have to install sustainable heating systems, such as a hybrid heat pumps, instead. Energy Live News](#)

⁹ [St Vincent de Paul & Threshold. 2021. 'Warm Housing for all? Strategies for Improving Energy Efficiency in the Private Rental Sector.'](#)

health care).¹⁰ This is essential to ensure that housing costs do not undermine a household's capacity to meet its energy needs.

- e. **Establish a Landlord Registry:** Enhanced tenant protections should be provided, and we support CATU's call to establish a landlord registry to enhance tenants' rights and access to justice.¹¹

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

- a. **Accelerate the Phase-Out of Fossil Fuels & Prioritise Energy Efficiency:** The Review of Ireland's Energy Poverty Strategy recognises the "growing connection between alleviating energy poverty and achieving national climate action objectives."¹² Fossil fuels are globally the biggest contributor to the climate crisis, and Ireland's continued dependence on fossil fuels is becoming increasingly costly to low-income households. Since January 2021, the price of gas has increased by more than 170% in Europe, and with it, the cost of electricity.¹³ As oil and gas account for 80% of Ireland's energy use, with gas accounting for 50% of electricity generation,¹⁴ Ireland is among the worst-hit countries in Europe by the cost-of-living crisis. Analysis from the Institute for European Energy and Climate Policy has shown that if no action is taken to reduce emissions from buildings, the energy bills of low-income households, which includes many Traveller and Roma families, will steadily increase over the coming decades.¹⁵
- b. **Nationalise the Energy System:** Nationalise Ireland's energy system to facilitate the just development of efficient, clean energy for the public good.¹⁶ France recently nationalised its energy system in light of the energy crisis.¹⁷
- c. **Revise the Fuel Allowance Scheme:**
 - i. Double the Fuel Allowance rate from €33 to €66.¹⁸
 - ii. Widen eligibility for the Fuel Allowance by including those receiving Working Family Payment,¹⁹ removing the waiting period for those on Jobseekers, expanding eligibility to cover the specific living arrangements of Traveller families, who may be doubling in trailers in yards.²⁰ A partial-rate Fuel Allowance payment should be available, so it is not all-or-nothing for people just outside the eligibility criteria.
 - iii. The Fuel Allowance Scheme should be available 32 weeks per year, as it was formerly. Currently, the Scheme is only available 28 weeks of the year and needs to be claimed in advance of the winter period.
 - iv. The Fuel Allowance Scheme must be targeted to reach members of the Traveller community who rely on social welfare and live in trailers as this cohort are

¹⁰ <https://www.ohchr.org/en/instruments-mechanisms/instruments/international-covenant-economic-social-and-cultural-rights>

¹¹ <https://catuireland.org/a-landlord-registry-for-tenants/>

¹² [Strategy to Combat Energy Poverty – Progress Review and Public Consultation](#)

¹³ [Climate Action Network Europe. 2022. High electricity prices, the links to fossil gas and the need to shift to 100% renewables and reduce energy demand.](#)

¹⁴ <https://www.irishtimes.com/business/economy/why-are-irish-gas-and-electricity-prices-going-up-1.4827718>

¹⁵ <https://ieecp.org/wp-content/uploads/2022/05/summary-IEECP-Socially-Just-homes.pdf>

¹⁶ Mercier, S. 2021. 'Ireland's Energy System: The Historical Case for Hope in Climate Action.' *New Labor Forum* Vol 30: 2, pp. 21-30 <https://doi.org/10.1177/10957960211008165>

¹⁷ <https://www.reuters.com/world/europe/frances-edf-be-fully-nationalised-borne-2022-07-06/>

¹⁸ [ESRI, 2022., Energy poverty and deprivation in Ireland](#)

¹⁹ [SVP Pre-Budget Submission 2023](#)

²⁰ [National Traveller MABS, 2019. Accommodating Ethnicity: Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers](#)

disproportionately impacted by energy poverty.²¹ Each family unit living separately, but sharing a Bay or address, should be treated as an individual household, and Fuel Allowance should be provided to each household that needs it.²²

- d. **Apply the €200 electricity credit to Traveller families:** Many Traveller families did not receive the €200 electricity credit in April 2022, despite being one of the most effected groups in this energy crisis. This is due to many Traveller families sharing utilities and being reliant on other forms of fuel. This credit should be applied immediately to Traveller families living, regardless of what type of Traveller accommodation they occupy.²³
- e. **Extend the existing moratorium on disconnections during winter months:** to a full ban on disconnections until at least Summer 2023.
- f. **Increase rates of all core social welfare payments:** by at least €20 per week.
- g. **Increase the minimum wage to a living wage.**
- h. **Pay all social welfare recipients a Christmas Bonus-style double welfare payment:** before the end of October at the latest.
- i. **Introduce an Energy Guarantee Scheme:** for individuals in poorly insulated homes and those on low incomes. This would provide a payment that is indexed to the changing cost of energy so that people in poorly insulated homes and those on low incomes will always be assured of a minimum quantity of energy to keep their homes warm. This payment should be indexed to the current cost of energy required to keep a person's home warm based on a set quantity of units (kWh).²⁴ The transition to an Energy Guarantee Scheme could be progressed by modifying the Fuel Allowance as outlined above.
- j. **Impose a windfall tax on energy companies:** that have seen high and increasing profits as a result of the energy price crisis. Recycle this tax revenue to assist consumers to offset higher energy bills. The European Commission approved temporary tax measures on energy utility companies to help provide consumers with relief from high energy prices.²⁵

4. 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.

Pavee Point, along with 20 other organisations, have endorsed the following recommendations made by Community Law and Mediation:²⁶

- A. **Whole of Government Approach:** Place the Strategy on **statutory footing** to ensure policy coherence and a whole-of-government approach. The Strategy will require cooperation between the Department of Environment Communications and Climate, the Department of Social Protection, the Department of Health, and the Department of Housing.
- B. **Improve Data Collection:**
 - The definition of energy poverty needs to be broadened. Energy poverty is currently measured through the "expenditure method." If a household spends 10% or more of their disposable income on energy, it is considered to be in energy poverty. It is Pavee Point's contention that a definition based on cost must also consider the additional

²¹ https://www.citizensinformationboard.ie/downloads/social_policy/MABS_Energy_Poverty_Report_2019.pdf

²² [Stamp, S., Kearns, M. 2019. Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers: an exploratory study.](https://www.citizensinformationboard.ie/downloads/social_policy/MABS_Energy_Poverty_Report_2019.pdf)

²³ https://www.foe.ie/assets/files/pdf/joint_statement_on_energy_poverty_and_energy_pollution_dated.pdf

²⁴ [Age Action, 2022. An Energy Guarantee for Older Persons: Policy Brief](https://www.ageaction.ie/age-action-2022-an-energy-guarantee-for-older-persons-policy-brief)

²⁵ <https://news.bloombergtax.com/daily-taxreport/european-leaders-back-windfall-profits-tax-on-energy-firms>

²⁶ <https://communitylawandmediation.ie/change/community-organisations-issue-joint-call-and-recommendations-for-a-new-energy-poverty-strategy/>

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 energy sources, 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 and fossil fuel dependency can be identified.
- C. **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 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.
- D. **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 Strategy. Pavee Point has already contacted the Department to express our concern that the Strategy was not afforded appropriate and inclusive public consultation. This consultation opened in August – during peak annual leave and school holidays – and was open for a period of only four weeks.
- E. **A Rights-Based Approach:**
- Pavee Point recommends the consultation and collaboration with relevant anti-poverty, housing, health, community, social justice, and human rights bodies to ensure the Strategy 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 in relation to energy poverty, including the right to livelihood, right to health, right to family life and right to non-discrimination.
- F. **Consistency with Climate Justice:** 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 disadvantaged and minority ethnic groups, like Travellers and Roma. 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.
- G. **Commit to delivering an Energy Poverty Act in 2023:** 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 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;

- 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.