Initial Public Consultation
Ireland's National Energy & Climate Plan 2021-2030

Submission prepared by students and staff on the MSc in Climate Change: Policy, Media and Society at Dublin City University[1]

1. Introduction and context

This submission was prepared by students and staff on Dublin City University's MSc. in Climate Change: Policy, Media and Society. Students enrolled on the programme as well as staff teaching on the programme were invited to participate in the preparation of this submission, but there was no requirement on them to do so. As such, this submission does not necessarily represent the views of all students and staff involved in the programme.

DCU's MSc. in Climate Change: Policy, Media and Society was launched in September 2018. The programme examines how societies are responding to climate change, and how that response can be strengthened. It is the only Master's programme in Ireland focused on climate change that adopts a social science and humanities perspective on this challenge. It brings together DCU's unique strengths in the study of climate change governance and law, communications and media, societal transitions, and education. Further details of the programme are available at www.dcu.ie/dc669.

Students and staff who contributed to this submission participated in a preparatory workshop on 6 November. The workshop was facilitated by Dr. Diarmuid Torney and Prof. Pat Brereton, who both teach on the programme. Students were allocated the themes covered below to research in advance of the workshop. Following detailed discussion of each theme at the workshop, students were asked to draft material for their allocated theme. This was compiled and circulated to the group for comment, following which the content of this submission was finalised.

[1] Contact point: Dr. Diarmuid Torney, School of Law and Government, DCU. Email: diarmuid.torney@dcu.ie

2. Rationale for selection of consultation questions

This submission responds to questions 1, 2, 4, 5, 7, 16, and 17, focusing on the themes of decarbonisation, renewable energy, energy efficiency, and energy poverty. We focus on these questions because they align most closely with the themes covered in one of the core modules of the Master's programme, LG5034 Climate Change Policy and Governance, taught by Dr. Diarmuid Torney, as well as some of the broader themes covered by the Master's programme. In the next section, we set out the guiding principles we believe ought to underpin Ireland's approach to climate and energy policy development.

3. Guiding principles

The following principles ought to guide the further development of Ireland's climate and energy policies. They underpin our responses to the consultation questions.

First, **climate change should be placed at the centre of policymaking**, as recommended by the Citizens' Assembly.[2] The recent special report on "Global Warming of 1.5°C" produced by the Intergovernmental Panel on Climate Change (IPCC) illustrated the magnitude of the challenge facing humanity. It concluded that the scale of changes required have "no documented historic precedent for their scale".[3] Ireland's policy response to date does not match the enormity of this challenge.

The Climate Action and Low Carbon Development Act 2015 strengthened Ireland's climate policy planning and reporting processes. The Climate Change Advisory Council created thereunder has played an important role to date in drawing attention to the limited policy response to date. Nonetheless, the existing governance architecture ought to be strengthened. This could involve a stronger cross-departmental accountability mechanism, possibly led by the Department of An Taoiseach, that would hold line ministries effectively to account in terms of climate action commitments. It could also include stronger parliamentary oversight of progress. Building on the current Joint Oireachtas Committee on Climate Action, an enduring Oireachtas committee ought to be established on a permanent basis.

Second, **effective communication of climate change policies to the public** is essential. The transition to a low carbon economy and society will require effort and change across Irish society as a whole. In order for such a change to happen, the public needs to be informed of how and more importantly why such actions are necessary. The ways in which the issue of climate change and climate policies are communicated to the public is vitally important.

[2] https://www.citizensassembly.ie/en/How-the-State-can-make-Ireland-a-leader-in-tackling-climate-change/Final-Report-on-how-the-State-can-make-Ireland-a-leader-in-tackling-climate-change/Climate-Change-Report-Final.pdf
[3] http://www.ipcc.ch/report/sr15/, p.21.

Simply informing the public is not enough. The "hypodermic" model of "injecting" information into the public has been shown to be ineffective and counter-productive time and time again. Framing public messaging in technical or negative ways is also ineffective. People must be given a compelling, emotionally engaging reason why we are doing this before we are told how we are going to do it.

In order to secure broad social support for a low-carbon transition, a sophisticated, multi-modal, multi-platform, two-way communications strategy must be put in place. All agencies of the State must be mobilised to take part in the communications element of the transition. Different social groups must be addressed in niche and targeted ways. The mechanics of transition are well known; the messaging has not yet been implemented successfully anywhere in the world. Ireland has a great opportunity to get this piece right.

Third, **better indicators of progress are needed** to measure and communicate progress on climate change goals to the wider public. One possibility in this regard is the "Genuine Progress Indicator" (GPI), which could be used alongside the widely used Gross Domestic Product (GDP) and Gross national Product (GNP) measures. While the latter are useful for measuring overall economic activity, they do not take account of negative environmental and social costs associated with some economic activity, such as pollution from fossil fuel power plants. Adopting GPI would allow more effective measurement of progress in achieving climate change goals, while at the same time better illustrating the negative effects that are a necessary consequence of fossil fuel burning.

More than half a dozen states in the USA have already calculated their GPI and are currently exploring how to use specific indicators and the GPI as a whole as a means for policy decisions and budget analyses.[4] Additional examples of places where GPI has already been calculated or used in some form include regions in Canada[5] and Finland.[6]

Fourth, **justice and equity should be central to Ireland's transition** to a low carbon economy and society. The noted political philosopher Prof. Henry Shue has talked about "The Unavoidability of Justice"[7] when dealing with climate change: This is inescapably a challenge of how we allocate the costs and benefits of climate change and our responses to it. All citizens, including those in poverty, must be fully enabled to play a part in shaping and participating in the new low carbon economy and society, and the needs of those suffering energy poverty must be given priority in shaping policy responses. Those disadvantaged by the transition, for example because of the ending of peat extraction and burning, should be assisted in finding

[4] http://www.gpiinthestates.org/states-using-gpi/
[5] http://www.gpiatlantic.org/community.htm
[6] https://www.researchgate.net/publication/315864498_The_national_GPI_calculations_for_Finland_1945-2016
[7] https://global.oup.com/academic/product/climate-justice-9780198713708?cc=ie&lang=en&#

meaningful and rewarding alternative livelihoods. This must be done in an anticipatory fashion, rather than as an afterthought once a decision has been taken to close a facility or industry.

Ireland must also take seriously its climate justice obligations in an international context. This means not just assisting those countries that are most vulnerable to climate impacts through development aid, but living up to its obligations to transition to a low carbon economy and society at home.

Fifth, **citizen participation should be central to shaping Ireland's low carbon transition**. The Citizens' Assembly was an exceptional experiment in democratic governance. Comprising ninety-nine citizens drawn from all walks of life, it afforded them the time, space, and structure to consider complex and important questions of public policy in a comprehensive and considered way. The 13 recommendations they agreed on the climate change topic were significantly more radical than many expected.

Innovative mechanisms for citizen participation have been employed in other countries and policy spheres. One such example is "participatory budgeting". This involves local citizens in decision-making on spending priorities for a specified public budget. Individuals and community groups can participate in deliberating and deciding upon proposals for public spending.[8] This was pioneered in Porto Alegre, Brazil in the 1990s, and was successful in mobilizing communities including the poor, improving access to small-scale infrastructure and services, and developing citizenship. Research has found that for such an approach to work, it must be adequately resourced and supported by government.[9]

The National Dialogue on Climate Action provides another important forum through which citizens are being involved in shaping the transition to a low carbon economy and society. Citizen participation also underpins the 2015 Energy Policy White Paper through its focus on "energy citizenship".[10] While these are very welcome developments, they ought to be given more prominence in shaping Ireland's approach to climate and energy policy. One way of doing so would be to use innovative deliberative forums to develop Ireland's long term low-carbon development strategy, which is required to be submitted by the end of 2019.

[8] https://www.gov.uk/government/publications/participatory-budgeting-in-england-final-report

[9] https://www.wri.org/wri-citiesforall/publication/porto-alegre-participatory-budgeting-and-challenge-sustaining

[10] https://www.dccae.gov.ie/documents/Energy%20White%20Paper%20-%20Dec%202015.pdf

4. Decarbonisation

Question 1: Taking into account the National Mitigation Plan, the National Development Plan 2018-2027 and Ireland's target under the Effort Sharing Regulation, what further measures to reduce non-ETS emissions do you believe Ireland should take?

Ireland has the potential to take much more robust action towards creating a low emissions economy and society than the existing National Mitigation Plan (NMP) sets out. The current NMP is not ambitious enough in its scope. In light of the recent the special report on "Global Warming of 1.5°C" of the Intergovernmental Panel on Climate Change (IPCC),[11] it is clear that the vision laid out in the NMP and the National Development Plan do not reflect the urgency of the challenge posed by Climate Change.

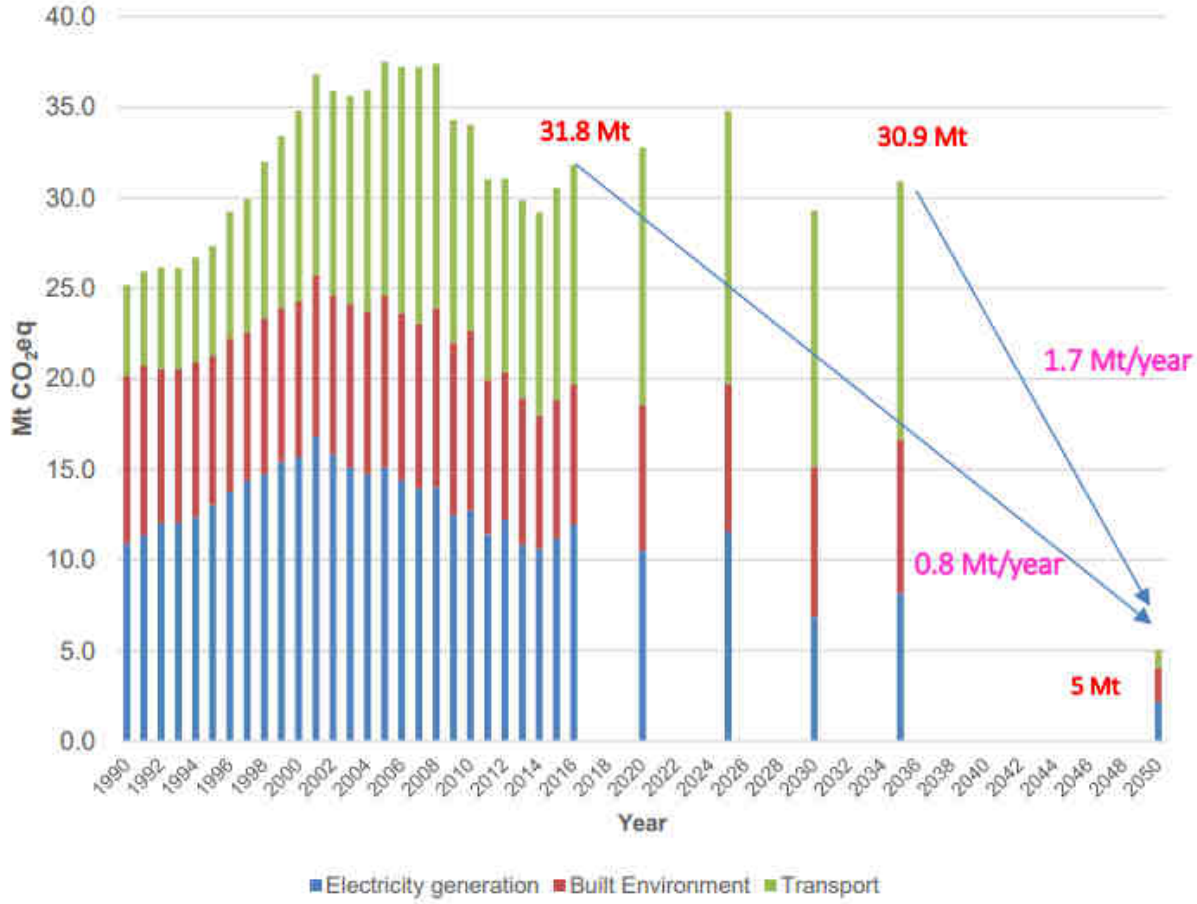
Many of the measures outlined in the NMP would arguably have been adopted irrespective of our mitigation targets. For example, while policies to expand quality public transport are welcome, such measures would have been a priority over the next decade due to demographic changes regardless of the need to reduce our emissions from car use. While integrating climate change priorities into policy making across the board is critically important, the promotion of existing policies as climate action measures is indicative of the extent to which the NMP is primarily a strategy for tweaking the status quo rather than providing a roadmap for the bold, transformative action required.

The principle of placing climate change at the centre of policymaking in Ireland was endorsed by the Citizens' Assembly's recommendations on climate change.[12] We urge the Government to implement those recommendations in full as part of the State's response to Climate Change. The Citizens' Assembly process demonstrated that, when a representative sample of citizens is presented with relevant information from trusted and authoritative sources on this issue and engaged in the process of developing solutions, they recognise the urgency of the threat of climate change and embrace robust policies in response.

Ireland's policy response to climate change must recognise the need to limit global warming to less than 1.5 degrees in order to mitigating the risks of climate change. As such, securing a just transition to a low-carbon economy and society as soon as possible should be a national priority.

[11] http://www.ipcc.ch/report/sr15/
[12] https://www.citizensassembly.ie/en/How-the-State-can-make-Ireland-a-leader-in-tackling-climate-change/Final-Report-on-how-the-State-can-make-Ireland-a-leader-in-tackling-climate-change/Climate-Change-Report-Final.pdf

Figure 1: Historic and projected CO2 emissions from the electricity generation, built environment and transport sectors



Source: Ireland's Greenhouse Gas Emissions Projections 2017-2035[13]

Ireland should plan its policies first in the long-term, acknowledging the targets we must meet by 2050, and work backwards to ensure that key milestones are met along the way. As the National Mitigation Plan points out, our reduction of non-ETS emissions by 2020 will fall significantly short of our target of 20% below 2005 levels. The EPA projections to 2030 are not positive in terms of reaching our targets. Figure 1 above illustrates the imperative of planning concrete milestones to 2050 and investing resources to ensure those milestones are reached. Otherwise, we face much more drastic and costly limitations on our economic activity over a shorter period of time.

Central to this long term planning must be an acknowledgement of the new reality we face in a low carbon society. The transition will be profoundly transformative, but whether the outcome of that transformation is a fairer, more equal society, with security and prosperity, depends on the depth and breadth of our response. In many respects, Irish people will have to find new ways of living. Local and regional decision-making must be at the heart of planning for and developing such new

[13] http://www.epa.ie/pubs/reports/air/airemissions/ghgprojections2017-2035/EPA_2018_GHG_Emissions_Projections_Summary_Report.pdf

pathways, particularly in relation to energy production; there is no “one-size fits all” approach for a cooperative transition to a low carbon economy. The Citizens’ Assembly offered one possible model for citizen participation in shaping a low carbon transition.

We need to think differently about how we live, given that our high and growing levels of consumption are not compatible with a low carbon economy. There are lessons to be learned from the Tiny House movement,[14] which offers potential solutions to our current housing crisis as well as the incompatibility of our current housing model with a low carbon society.

To reduce emissions from the non-ETS sector, Ireland should be a global leader in the green economy. Our potential as an incubator for new green energy technologies is as yet largely untapped. Given that emissions from agriculture are projected to remain untenably high up to 2030, it is essential that we consider alternative models for rural development that do not rely on such high-emission production and that help to remove GHG emissions from the atmosphere, including through peatland restoration.

There is scope for public-private partnerships at local and regional levels, particularly in developing cooperative renewable energy projects in hydro and wind energy. Fossil fuel subsidies should be ended and the funds used instead for developing such projects and securing increased employment in the green economy in the future. It is imperative that fossil fuel exploration ceases immediately if we are to keep global warming well below 2 degrees and aim for 1.5 degrees, in line with our commitments under the Paris Agreement.

5. Renewable energy

Question 2: How do you believe Ireland’s national contribution towards the EU’s 2030 renewable energy target of 32% should be determined? Please include your reasoning.

Taking into account the latest scientific findings from the IPCC “Global Warming of 1.5°C” report,[15] the EU target of a 32% share of renewable energy in consumption by 2030 is insufficient in order to limit global warming to 1.5°C. Given the severe differences for life on Earth between a warming of 1.5°C and 2.0°C that are outlined in the IPCC report, both the EU and each of its member states need to step up their mitigation efforts significantly.

Specifically, the IPCC states in its summary for policymakers:

[14] https://news.un.org/en/story/2018/07/1014982
[15] http://www.ipcc.ch/report/sr15/

> In 1.5°C pathways with no or limited overshoot, low-emission energy sources are projected to have a higher share, compared with 2°C, particularly before 2050 (*high confidence*). In 1.5°C pathways with nor or limited overshoot, renewables are projected to supply 70-85% (interquartile range) of electricity in 2050 (*high confidence*).[16]

Ireland as a developed country of the global north has both the financial and technological means and the responsibility to rapidly develop a low-carbon economy, so that developing countries may follow its lead. Therefore, we propose a minimum overall goal of 50% of renewable energy consumption by 2030. In order to have a chance of staying below 1.5°C warming globally, Ireland should implement a renewable energy target of at least 90% for 2040 thereafter.

Other parts of the world have already declared even higher goals. Wales, for example, is aiming for a share of 70% renewables by 2030.[17] Germany has pledged to have a share of 65% of its electricity consumption stemming from renewables by 2030.[18] We acknowledge the differences between the available options for each country in reaching a 100% renewable energy supply, but given the aforementioned examples, a 50% share by 2030 for Ireland is both technologically and financially feasible. By adopting the proposed target, Ireland would send a strong signal not only to the EU, but to businesses and society, that the time for renewable energy deployment has come.

Question 4: What policies and measures do you believe Ireland should adopt to achieve its renewable energy contribution and what are the grounds for your recommendations?

Ireland should look at the aims and strategies used by other countries to help instruct its National Energy and Climate Plan 2021-2030. Germany has provided many examples of laws and policies that Ireland could implement in the aim of significantly increasing renewable energy use. For example, Germany passed a law (Elektromobilitätsgesetz) giving e-cars special rights and privileges, for example, for parking, in order to increase their use, lowering or waving parking fees, and exempting electric vehicles from certain access restrictions.[19] This is one small step that Ireland could make to encourage the use of electric vehicles.

Another country that is an example of how to approach renewable energy is Sweden. The World Economic Forum recently published an article explaining that Sweden is well on its way to meeting its 2030 renewable energy target, possibly by

[16] http://www.ipcc.ch/report/sr15/, p.21
[17] https://gov.wales/newsroom/environmentandcountryside/2017/170928-lesley-griffiths-high-on-ambition-for-clean-energy/?lang=en
[18] https://reneweconomy.com.au/germany-lifts-2030-renewable-energy-target-65-12576/
[19] https://www.bmu.de/en/topics/air-mobility-noise/mobility/electric-mobility/

the end of this year. One of the main contributors to this was the significant focus that Sweden put on Wind Turbines: “By the end of 2018, Sweden will have installed 3,681 turbines, with a capacity of 7,506 MW and an estimated annual production of 19.8 TWh”.[20]

Ireland, with its unique geography on the western edge of Europe, has an advantage over other European countries with regards to wind and solar power potential. Investment in wind power in Ireland isn’t just economically and environmentally rewarding, it’s also inevitable. Communities should be centrally involved in the transition to renewable energy, including through community ownership and other models of involvement in the development of future renewable energy. Promoting energy citizenship in this way promises to ameliorate some of the concerns that some existing development of renewable energy has provoked.

Ireland needs to make a significant transition to renewable energy over the next 12 - 22 years, creating targets of at least 90% renewable energy by 2040. This is a transition that would not just decrease our impact on climate change, but would also provide Ireland with a limitless renewable source of energy. The need to transition to renewable energy is hugely supported by the Irish population, as seen in a number of the recommendations of the Citizens’ Assembly:[21]

- “96% of the Members recommended that the State should immediately take many steps to support the transition to electric vehicles.”

- “99% of the Members recommended that the State should enable, through legislation, the selling back into the grid of electricity from micro-generation by private citizens (for example energy from solar panels or wind turbines on people’s homes or land) at a price which is at least equivalent to the wholesale price.”

- “100% of the Members recommended that the State should act to ensure the greatest possible levels of community ownership in all future renewable energy projects by encouraging communities to develop their own projects and by requiring that developer-led projects make share offers to communities to encourage greater local involvement and ownership.”

- “97% of the Members recommended that the State should end all subsidies for peat extraction and instead spend that money on peat bog restoration and making proper provision for the protection of the rights of the workers impacted; and 6 (b) 61% recommended that the State should end all subsidies on a phased basis over 5 years.”

[20] https://www.weforum.org/agenda/2018/07/sweden-to-reach-its-2030-renewable-energy-target-this-year
[21] https://www.citizensassembly.ie/en/How-the-State-can-make-Ireland-a-leader-in-tackling-climate-change/Final-Report-on-how-the-State-can-make-Ireland-a-leader-in-tackling-climate-change/Climate-Change-Report-Final.pdf

The Irish state should accelerate the elimination of subsidies of peat burning, including through co-firing with biomass, as recommended by 97% of the members of the Citizens' Assembly. This should be enacted on a phased basis over a five year time horizon, as recommended by 61% of the Citizens' Assembly. The money saved through ending the state subsidisation of peat burning should be used to support peat bog restoration as well as a just transition and climate action, including through retraining of workers affected by the measure and, as appropriate, allowing early access to pensions for those workers close to retirement.

Ireland is the location for data centres serving all of Europe and is therefore responsible in terms of emissions accounting for the total carbon footprints of those data centres. Data centres are project to constitute a significant share of Ireland's electricity consumption to 2040 under all of the scenarios prepared by EirGrid as part of its "Tomorrow's Energy Scenarios Report 2017".[22] It stands to reason that if these tech companies, which produce huge amounts of greenhouse gases, are located in Ireland then they should be responsible for their contribution to Ireland's carbon footprint. A green tax should be implemented on these companies so that they may be accountable for their greenhouse gas contribution.

6. Energy efficiency

Question 5: Bearing in mind Ireland's current state of progress on energy efficiency, what contribution do you believe Ireland should make to the EU indicative energy efficiency target of 32.5% by 2030, and why?

Between 2009 and 2016 Ireland's energy efficiency rose by 12% and looking at the public sector alone this increase was 21%. Although the national target of 20% for 2020 is considered to be unlikely at this stage[23] that leaves a lot of space to further optimise all areas of potential improvement. An excellent example of energy efficiency is the Kilbarrack Fire Station which has reduced electricity consumption by 80%.[24] Moreover, the GreenPlan was conceived and tested at the station and has since been implemented across communities in Ireland.[25]

Considering that Ireland won't hit the 2020 targets, it is recommended that Ireland aim for more than the EU target of 32.5%. According to a 2012 report by the Department of the Environment, Community and Local Government, "There was an estimated 2,012,0003 million dwellings in Ireland as at end 2010 of which some 52% were built before the Building Regulations 1991 first came into operation on 1st June

[22] http://www.eirgridgroup.com/site-files/library/EirGrid/EirGrid-Tomorrows-Energy-Scenarios-Report-2017.pdf
[23] https://www.dccae.gov.ie/documents/NEEAP%204.pdf, p.8
[24] https://www.dublincity.ie/sites/default/files/content/WaterWasteEnvironment/DublinFireBrigade/Documents/Green%20Plan%20Kilbarrack%20Fire%20Station%20Information%20leaflet.pdf, p.2.
[25] http://thegreenplan.ie/what-we-do/

1992".[26] Here again we see the scope of renovation and improvement that is possible. Through renovation and implementation of schemes, such as The GreenPlan, job growth can be achieved. Taking into consideration the transition from fossil fuel intensive industries that is needed to cut emissions, and job losses that are inevitable because of this, the potential benefits of job creation in renovation can help mitigate the costs of scaling down other industries.[27]

Question 7: What policies and measures do you believe Ireland should adopt to achieve its energy efficiency contribution and what are the grounds for your recommendations?

The example of Dublin Fire Brigade above is but one of many local initiatives that could drastically improve energy efficiency across the country. Carlow and Kilkenny Energy Agency and Kilkenny County Council have also upgraded parts of their local areas with the Streetlight EPC initiative. This project enabled streetlight refurbishment with Energy Performance Contracting (EPC). The results of the project were significant and suggestions from the post project analysis report should be taken into consideration. Twice the SEAI Triple E register was called out as a barrier for being "too slow and cumbersome" and also financially as the range of products on the register is limited.[28]

The SEAI has a huge role to play in making Ireland more energy efficient and to that end needs to as much as is possible simplify the process for businesses and citizens to access information and take advantage of grants and schemes which they may be eligible for. National public information through TV, radio and leaflets are all effective ways of raising awareness to such programmes as well as local community awareness campaigns such as the recent "Be Winter Ready" Campaign.[29] Around the country there are many great examples of community action to become more energy efficient. The Templederry Community Wind Farm, in Tipperary, is a great example of how informing a community of the benefits of transitioning to low carbon energy efficient practices is possible and can have multiple benefits including local job creation. Paul Kenny, the Chief Executive Officer of Tipperary Energy Agency, claims that "community ownership is critical to the future of wind farms in Ireland".[30]

A carbon tax is an important policy instrument to promote efficient use of energy. For instance, in Canada the federal government is implementing a new carbon tax in 2019. The revenue from the tax will go back to individuals and so the burden of cost will not fall solely on citizens. As stated by the Canadian government, "Most

[26] https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/BuildingStandards/FileDownLoad,42487,en.pdf, p.5.
[27] https://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/DevelopmentandHousing/BuildingStandards/FileDownLoad,42487,en.pdf, p.5.
[28] http://www.streetlight-epc.eu/fileadmin/redakteure/Streetlight-EPC/Project_outputs/WP2/Analysis_Report/Analysis_report-Carlow_Kilkenny_County-EN.pdf, pp.2 & 3.
[29] https://www.winterready.ie/en
[30] https://tippenergy.ie/projects/templederry-community-wind-farm/

households in those provinces will receive more in Climate Action Incentive payments than the increased costs they incur from carbon pollution pricing. This incentive will benefit those who adopt practices that lead to less carbon pollution".[31] Rewarding citizens who make cleaner energy choices, as in the Tipperary example where surplus electricity is sold back to the grid, or by financially incentivising those that cut down on dirty emissions and therefore changing behaviour, as Canada hopes to do, is the type of positive action that is essential. Measures like these strengthen government leadership in climate change actions and send a clear message to investors and businesses the future direction of policies which in turn creates a more stable economy.

The carbon tax in Ireland is currently set at €20 p/tonne and the advice of the Climate Change Advisory Council to increase this to €30 p/tonne in 2019 was not heeded.[32] The Citizens' Assembly also supported higher carbon taxes that increased year on year and stipulated that "Any increase in revenue would be only spent on measures that directly aid the transition to a low carbon and climate resilient Ireland".[33]

7. Energy poverty

Question 16: Ireland currently has an energy poverty strategy 2016-2019. Do you believe that a new strategy is required to cover the period up to 2030 and what objectives should it contain?

Energy poverty is a social justice issue, and should be at the heart of climate and energy policy. It has been estimated that 28% of households in Ireland could be in energy poverty.[34] Of these, some households are spending up to 25% of their income on heating and energy. The Strategy to Combat Energy Poverty 2016–2019 does much to target this. A new energy poverty strategy covering the period to 2030 should focus on the following themes.

Upgrade of the housing stock: Building regulations ensure new buildings are energy efficient, but if the living standards of all citizens are to be raised, current measures to support retrofitting of homes should be extended. Stamps and fuel allowances (about €22 per month) help those living in poverty to pay energy bills, but they do not help to reduce carbon emissions from the housing stock. One of the keys to targeting this is to upgrade the fuel efficiency of the homes of those living in

[31] https://www.canada.ca/en/environment-climate-change/services/climate-change/pricing-pollution-how-it-will-work/putting-price-on-carbon-pollution.html
[32] http://www.climatecouncil.ie/media/CCAC_AnnualReview2018.pdf, p.5.
[33] https://www.citizensassembly.ie/en/News/Publication-of-Citizens-Assembly-Final-Report-on-How-the-State-can-make-Ireland-a-Leader-in-Tackling-Climate-Change.html
[34] https://www.dccae.gov.ie/en-ie/energy/publications/Documents/5/A%20Strategy%20to%20Combat%20Energy%20Poverty%20-%20Web%20Version.pdf

energy poverty**.** Emissions from housing in Ireland are 58% higher than the EU average.[35] The Better Energy Warmer Homes scheme was established in 2002 and delivers free energy efficiency improvements to the homes of people who are in receipt of certain welfare payments. The scheme is projected to result in 590 GWH of energy savings by 2020.

Fuel types: Research commissioned by the (then) Department of Communications, Energy and Natural Resources show that those using oil and solid fuel are more likely to be in fuel poverty.[36] Recent research has shown that even though households may have access to the gas network, they will choose the solid fuel for heat. This is because they can budget week to week, despite the fact that heating with gas may be less costly in the long run. Fear of disconnection/engagement with energy providers is common and should be addressed, possibly by the energy provider.[37]

Implications of electrification of heating: Natural gas is less polluting than coal and peat. The Energy Policy White Paper includes issues such as examining greater use of the gas network.[38] This may be part of the solution to fuel poverty, but in the long run, we will need to electrify, at least some of the heating system**.** Decarbonisation of heat will be very challenging, will require significant network upgrades, and there may be limits to what is viable. ESB Networks is the distribution system owner in Ireland and plans to develop heat electrification. A study of the implications of this should be part of an energy poverty strategy for 2030.

Demographics: Those referred to as the 'squeezed middle', paying tax and eligible for few supports, may also be in fuel poverty. Those paying high mortgages or rents, while being forced into long commutes, may have to spend a considerable amount of their weekly income on petrol or diesel in addition to heating their home. This demographic should be recognised as being disadvantaged, and should be a focus of a future energy poverty strategy.

Education: More education and awareness initiatives such as the Green Schools initiative should be promoted as part of a future energy poverty strategy. Such an approach will lead to better understanding of energy efficiency in the community, and will influence people towards better behaviours.

[35] https://www.seai.ie/resources/publications/Energy-in-the-Residential-Sector-2018-Final.pdf
[36] https://www.dccae.gov.ie/documents/An%20Objective%20Analysis%20of%20Energy%20Poverty%20in%20Ireland.pdf, p.15.
[37] https://www.esri.ie/publications/the-timing-and-other-determinants-of-gas-central-heating-adoption/
[38] https://www.dccae.gov.ie/documents/Energy%20White%20Paper%20-%20Dec%202015.pdf

Question 17: What policies and measures do you believe Ireland should adopt to achieve its energy poverty objectives and what are the grounds for your recommendations?

Lone parents and those living alone that are not in receipt of social welfare payments could be included in the group of those eligible for a fuel allowance or more help. Studies by St Vincent de Paul[39] and the ESRI[40] found those living alone and lone parents to be some of those particularly at risk. These demographics may not necessarily fall into existing categories of those eligible for assistance. A study by ESRI researchers found that inadequate resources as opposed to poor quality housing alone was a consistent factor for those in fuel poverty.[41] The eligibility of lone parents for help will be subject to 'ongoing review', according to the current Strategy.

Local authorities are responsible for 144,000 homes in Ireland. Work is ongoing to upgrade this housing stock. The "Better Energy Communities Scheme" targets clusters of homes, and has proven successful. Good will, local buy-in, and an efficient area-based approach contribute to its success. For example, in a pilot scheme of this nature in Dundalk, Electric Ireland retrofitted 124 homes in 8 weeks, at a cost €4000 per house. This allowed the energy provider to work towards meeting its obligation to target residential properties (20 %) and those in fuel poverty (5%). This scheme should be scaled up, possibly with an increase in the obligation of energy providers to target those in fuel poverty.

In the private rented sector, a minimum BER rating should be a requirement. Grants are in place to help home owners improve energy efficiency and insulation. This includes those that provide private rented accommodation. However, there is no mandatory obligation to ensure that rental accommodation is of a standard that will prevent fuel poverty, such as a minimum BER rating. According to St. Vincent de Paul, there is "little incentive for private landlords or tenants to improve dwelling efficiency".[42] The Strategy to Combat Energy Poverty mentions a plan for 'consideration' of minimum energy efficiency standards after 2020, and views are sought on grants specifically for landlords. From a social justice view point, this should be more than just a consideration. It should be compulsory, and should be discussed sooner rather than later so that lead-in times for uprates are fair and practicable.

[39] https://www.svp.ie/getattachment/b4943724-b62c-41b8-be64-cd19c76a1cf0/Policy-Links-Energy-Poverty.aspx
[40] https://www.esr.ie/article/view/342/110
[41] https://www.esr.ie/article/view/342/110
[42] https://www.svp.ie/getattachment/b4943724-b62c-41b8-be64-cd19c76a1cf0/Policy-Links-Energy-Poverty.aspx