



SUBMISSION TO  
DEPARTMENT OF ENVIRONMENT,  
CLIMATE AND COMMUNICATIONS  
in respect of the  
Revised Energy Poverty Action Plan

Clare Public Participation Network

13th May 2024

**Abstract**

Submission for consideration in response to the public consultation on  
the Revised Energy Poverty Action Plan

CLARE PUBLIC PARTICIPATION NETWORK

[sarah@clareppn.ie](mailto:sarah@clareppn.ie)

**Clare PPN** is a network of 416 community & voluntary, environmental and social inclusion groups from Clare. Clare PPN has three ‘Colleges’ which gather the member groups in terms of their interests and activities – these are environmental college, social inclusion college and community and voluntary college. Clare PPN exists to facilitate the formal participation by the community sector in Clare County Council’s decision-making structures and to serve as a support and information sharing network for the Community and Voluntary Sector in Clare. It is funded jointly by the Department of Rural and Community Development and Clare County Council but is autonomous and its activities are directed by its members through an elected secretariat. Clare PPN’s website is [www.clareppn.ie](http://www.clareppn.ie) and we are on [facebook.com/clareppn](https://facebook.com/clareppn) and Instagram [@ClarePPN](https://instagram.com/ClarePPN)

## **Introduction**

Clare PPN welcomes this opportunity to provide input towards the Revised Energy Poverty Action Plan. Energy poverty is at crisis levels in Ireland. Here in Co Clare, this is something that many member groups of our network are acutely aware of.

Access to adequate levels of energy is a precondition to the realisation of many rights, impacting our lives, health and living standards.

We are currently in a crisis situation in Ireland, due to continued high energy costs driven by dependence on fossil fuels, the highest level of energy poverty on record, and a rapidly worsening climate crisis. The government must urgently prioritise solutions that address the structural causes of these interlinked problems.

Inequalities arising from the transition to a low-carbon economy and society such as energy poverty and food insecurity, intersect and overlap with pre-existing issues, compounding inequality and negatively impacting mental health.

Almost half (48%) of Ireland’s housing stock is energy inefficient, with poorly insulated homes locked into fossil fuel dependence. Energy inefficient housing stock is one of the main contributors to Ireland’s high greenhouse gas emissions, accounting for 19.8% of Ireland’s carbon emissions. In order for Ireland to meet internationally-agreed climate targets, and to mitigate our contribution to the climate crisis, it is essential that we tackle energy poverty. Tackling energy poverty is a key part of decarbonisation that ultimately helps to safeguard the rights of all citizens – not only those experiencing energy poverty.

## **Retrofitting**

Among the groups consulted as part of the research carried out in 2023 by TASC for Clare PPN's project, 'Fair Clare: Securing Socio-economic Rights & a Just Transition in County Clare', the majority did not feel they were in a position to avail of the grants available through the Sustainable Energy Authority of Ireland (SEAI) for retrofitting. While those living in Local Authority Housing will have their homes retrofitted over time, our research indicated that significant challenges remain for renters, those on HAP, those on halting sites, owners of older one-off housing, low-income older people living alone and low-income, single-parent families.

Clare PPN recommends that the SEAI should provide broader access, including to those on low and middle incomes, to its Fully Funded Energy Upgrade Scheme – in other words a grant for 100% of the cost of a home retrofit.

We also recommend the provision of grants and loans to protect the living conditions of structurally vulnerable groups in Clare. In the case of those living in private rented accommodation, we would like strong safeguards put in place for tenants, such as legislative protection introduced to protect their tenancies during retrofitting by landlords, in addition to upholding the commitment in Ireland's national housing plan, Housing for All, to introduce a minimum Building Energy Rating (BER) for rental properties, beginning in 2025 (Government of Ireland, 2021b).

Furthermore, Clare PPN recommends expanding collective or neighbourhood-based approaches to retrofitting and we recommend directing funding towards them to allow for economies of scale and remove some of the administrative burdens from individuals. Reducing fossil fuel dependency at home supports a fairer transition by delivering reductions in carbon emissions while also improving homes, health and lowering energy costs for those who benefit. State-funded retrofitting schemes are also an opportunity to develop sustainable livelihoods.

## **Energy democracy**

The quest for energy democracy aims to reclaim to the public sphere aspects of the energy economy that have been privatised; to facilitate ownership of energy projects by the communities living near them; and a restructuring of the energy system in order to massively scale up renewable and low-carbon energy, aggressively implement energy conservation, ensure job creation and

local wealth creation, and assert greater community and democratic control over the energy sector.

In simple terms, Clare PPN advocates that energy infrastructure and resources in Ireland should be owned either by local communities or by the State. Giving communities a say and a stake in local energy sources is an essential part of a just transition. The rapid decarbonisation of our society and economy requires community buy-in and will not happen without community involvement.

Clare PPN recommends actively endorsing inclusive community ownership of transition-related assets. This includes considering partial or full ownership by local communities of renewable energy generation projects such as solar farms, wind farms and related supply chain businesses. Similarly, neighbourhood groups should be facilitated in setting up small-scale, collectively owned energy generation and battery storage networks, and in selling power back to the grid. Currently only individual households are permitted to do this - groups are precluded from doing so.

Clare PPN recommends that consideration be given to the nationalisation of Ireland's energy system. The energy crisis is an opportunity to consider how we can transition our energy system in a way that is fair, while ensuring energy security, and delivering social and ecological benefit. Nationalising our energy system and bringing it under democratic control could allow the government to prioritise energy efficiency, develop renewable energy and end energy poverty.

## **A rights-based approach to energy poverty**

Access to affordable energy is essential to social inclusion. It is essential therefore that energy poverty is addressed through a rights-based approach that makes clear to the public what the responsibilities of all levels of government are to people, particularly marginalised and vulnerable groups.

A rights-based approach can facilitate coherence and coordination across law and policy, enabling an integrated and whole-of-government approach, which is essential, given that energy poverty falls within the remit of multiple Departments.

The Irish Human Rights and Equality Commission (IHREC), in their Policy Statement on a Just Transition published in April 2023, underscores the importance of anchoring a Just Transition in a rights-based framework to protect and realise the socio-economic rights of structurally vulnerable groups.

Clare PPN recommends that the Government should consult and collaborate 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.

## **System of financial supports**

The energy credits given to households during the recent cost-of-living crisis have been given to all houses, regardless of means and regardless of how many houses the customer owns. Clare PPN recommends that this system be reformed so that:

- Means testing is used to ensure that energy credits and other similar payments are targeted at low- and middle-income households.
- Energy credits are only given in respect of a person's first home, not for holiday homes.

While we appreciate the initiatives by energy providers to make it easier for customers in arrears to pay their bills – such as staggered payments etc – none of these schemes addressed the fundamental cause of households' inability to pay their bills, namely that the cost was too high. None of the initiatives made the energy cheaper.

Access to energy must be reframed as a socio-economic right at which there is a baseline, below which people's socio-economic rights are being denied.

## **Large industrial users**

Irish government policy regarding energy development prioritises the needs of industrial and commercial sectors, most notably the data centre sector. The most recent figures from the CSO show that data centres consume 18% of Ireland's electricity, a figure that is rapidly increasing. This excessive electricity consumption is placing severe pressure on Ireland's national grid; is indirectly putting upward pressure on household energy bills; and is counterproductive to the goal of decarbonising our economy and society.

Clare PPN recommends that the prioritisation of 'large energy users', i.e. data centres, in government policy should be reviewed.

We further recommend that a national moratorium be imposed on the development of data centres pending an in-depth assessment of what is needed to meet our carbon budgets carried out.

## **Conclusion**

Clare PPN/CEN welcome this opportunity to make submissions in respect of the Revised Energy Poverty Action Plan. We welcome any queries about any aspect of this submission. We wish to state in conclusion our commitment to working collaboratively to maintain and improve the sustainability of our communities in a manner that seeks to include and consider every member of the population in Clare and the future generations to come.

Any queries in relation to this submission can be directed to Sarah Clancy, Clare PPN Coordinator, for the attention of the Secretariat of Clare PPN:

Email: [sarah@clareppn.ie](mailto:sarah@clareppn.ie)

Tel: 087-1617375