



Action for Warm Homes

Northern Ireland

**National Energy Action NI
Response to the Department for the
Economy's Transposition of the
2019 Electricity (Recast) Directive
Consultation**

October 2020

About NEA

NEA is the national fuel poverty charity working to secure affordable warmth for disadvantaged energy consumers. NEA's strategic aims include influencing and increasing strategic action against fuel poverty; developing and progressing solutions to improve access to energy efficiency products, advice and fuel poverty related services in UK households and enhancing knowledge and understanding of energy efficiency and fuel poverty.

NEA seeks to meet these aims through a wide range of activities including policy analysis and development to inform our campaigning work, rational and constructive dialogue with decision-makers including regulatory and consumer protection bodies, relevant Government Departments, the energy industry, local and national government and we develop practical initiatives to test and demonstrate the type of energy efficiency programmes required to deliver affordable warmth.

NEA is primarily concerned with energy policy whilst maintaining a watching brief on social justice policies including income inequalities and levels of poverty in Northern Ireland.

Protecting vulnerable customers is our key aim so we work both reactively and proactively to ensure policy makers and regulators recognise the needs of the vulnerable in its widest sense. With tighter household budgets it is more important than ever that consumers are getting the best deal. Paying for domestic energy makes up a substantial portion of total household expenditure, so it is of specific concern to us but is often relegated in the ever-busy policy environment.

Fuel Poverty in Northern Ireland

Based on the 2016 House Condition Survey (HCS), Northern Ireland has a rate of fuel poverty at 22%. It is also estimated that there are approximately 43,800 households in extreme fuel poverty which means they need to spend over 15% of their total income to heat their homes. Additionally, one in five households in Northern Ireland are living in relative poverty and 19% of working age adults in the private rented sector spend more than a third of their income on housing .

Poor housing standards are responsible for the impaired physical and psychological health of millions of UK households. The links between low indoor temperature and poor health have been well understood for many years. Cold homes increase the likelihood, repetition and the severity of respiratory and cardiovascular illnesses hence leading to increased excess winter death rates. Between August 2017 – July 2018 there were 1,500 excess winter deaths in Northern Ireland. According to the World Health Organisation (WHO), a third of these deaths are directly attributable to living in cold damp homes.

The links between dampness and mould growth on asthma and allergies are also well known and understood as well as the impact that a cold home has on poor mental health, low self-esteem, educational performance and social isolation.

Additionally, and unique to Northern Ireland, 68% of all households are reliant on home heating oil, a non-regulated fuel.

Improved insulation and heating standards are seen as the most rational and sustainable means of mitigating heating price increases and ensuring affordable warmth. While we must decarbonise our energy system, we must also ensure that the needs of those on lower incomes and experiencing fuel poverty should be protected.

Our Response

While we understand that, at present, the key focus for the Department is to ensure that the Single Electricity Market (SEM) is maintained and fully operational after the implementation period. We also note that issues such as retail, consumer vulnerability and fuel poverty issues are an integral part of the Electricity Directive and Clean Energy Package as a whole and the translation of these issues have been paused and are to be considered under the new energy strategy. The delay in transposing these articles is concern to NEA and we would like to seek an assurance from the Department that these issues are fully translated into the energy strategy.

As outlined above, fuel poverty remains a scourge on our society and we need to draw on all policy levers to mitigate and ultimately eradicate the problem. We look forward to hearing from you at your earliest convenience.

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