

# Fuel Poverty Coalition Northern Ireland



## Response to Department for Communities: Consultation on a new Fuel Poverty Strategy for Northern Ireland

The Fuel Poverty Coalition (FPC) Northern Ireland is united by our ambition to highlight the need for urgent action to eradicate fuel poverty in Northern Ireland. There is clear need for a strategic, cross-departmental, and cross-sectoral approach to tackle NI's fuel poverty crisis. [Polling](#) conducted for National Energy Action NI in September 2024 revealed that as many as 40% of households are now living in fuel poverty<sup>1</sup>.

In 2023, the FPC published a [joint report](#) outlining what we considered should be the key strategic priorities and action points for a new Fuel Poverty Strategy for NI<sup>2</sup>. Since then, members have continued to advocate for action on fuel poverty and engaged extensively with the Department for Communities (DfC) and the wider Executive.

As such, the FPC sincerely welcomes the publication of this draft strategy and consultation. Comments on each section of the draft strategy are provided below. This is not intended to be an overly detailed response, as some FPC members also intend to submit individual organisational responses, highlighting their organisation's specific priorities and expertise.

**In summary, the FPC welcomes the draft strategy's key objectives, proposed outcomes, and actions but is disappointed by the absence of specific, measurable targets – especially a clear target for reducing fuel poverty. We also urge for the finalised strategy to be backed by comprehensive funding and a detailed action plan for effective implementation.**

### Vision and Principles

The proposed vision – 'A warm, healthy home for everyone' – is clear and aspirational. It succinctly conveys that fuel poverty is a cross-departmental and cross-sectoral challenge, encompassing issues relating to energy, health, housing, equality, social deprivation, and the environment.

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<sup>1</sup> National Energy Action Northern Ireland, (2024). '[NEA and LucidTalk Poll 2024](#)'.

<sup>2</sup> Fuel Poverty Coalition Northern Ireland, (2023). '[A New Fuel Poverty Strategy for Northern Ireland](#)'.

In 2023, the FPC identified seven overarching principles that we agreed should be embedded into the design, development and implementation of a new Fuel Poverty Strategy to ensure it delivers effectively for fuel poor homes<sup>3</sup>. We are encouraged that the draft strategy's four proposed principles closely reflect our recommendations.

We agree with the proposed 10-year strategy period (2025 – 2035), as this establishes long-term direction for stakeholders. A mid-term review in 2030, alongside annual indicators, annual reporting, and an annual Ministerial Statement, is a welcome approach for accountability and adaptability.

### **Make Homes More Energy Efficient**

The FPC wants to see improved housing quality across all tenures. We support the draft strategy's objective to improve energy efficiency for vulnerable households.

- **Update Housing Fitness Standards by 2030:** We support this commitment, including the need for a clear and robust definition of “thermal comfort”. However, we believe updated standards are long overdue and should be delivered sooner.
- **Minimum Energy Efficiency Standards (MEES):** We strongly endorse introducing MEES for the Private Rented Sector (PRS) by 2027, but call for the final strategy to include specific, measurable targets for MEES implementation and reducing fuel poverty. Our 2023 joint report recommended a target to reduce fuel poverty to 20% by 2027 and eradicate it by 2035, ensuring no low-income households live in homes with an EPC rating below Band C.<sup>4</sup>
- **Useful Data for MEES implementation:** This includes up-to-date Energy Performance Certificates (EPCs), records of energy efficiency upgrades, records of complaints, and information relating to property type, heating systems, and energy costs.
- **Potential barriers to MEES implementation:** For effective MEES implementation, barriers to overcome include landlord resistance due to costs, enforcement gaps, potential tenant displacement during upgrades, and affordability for small-scale landlords.
- **Rural Properties:** As well as the PRS, there is a need to prioritise energy efficiency support for rural properties, which face additional challenges, such as reliance on oil heating and restricted access to low-carbon heating technologies.
- **Sliding Scale of Support:** We endorse a sliding scale approach to funding for home energy schemes, ensuring funding is distributed according to need, and that low-income and vulnerable households are prioritised.

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<sup>3</sup> For more information see: Fuel Poverty Coalition Northern Ireland, (2023). *'A New Fuel Poverty Strategy for Northern Ireland'*, pp. 6.

<sup>4</sup> For more information see: Fuel Poverty Coalition Northern Ireland, (2023). *'A New Fuel Poverty Strategy for Northern Ireland'*, pp. 11.

- **Alignment across Government Domestic Energy Efficiency Schemes:** We support aligning all government domestic energy schemes with the Fuel Poverty Strategy principles. A coordinated approach across all schemes is essential to maximise impact, prioritise those in need, and prevent gaps in support.

### **Collaborate and Build Capacity**

The FPC endorses the objective of increasing access to trusted energy efficiency advice, measures and support for low-income, vulnerable households, through partnership working.

- **Collaboration and Referral Pathways:** We strongly agree that DfC should build on and utilise existing partnerships and referral pathways between Government, local Government, health professionals and the Voluntary and Community Sector, to support a more coordinated and holistic support system for people struggling with fuel poverty. This should include DfC strengthening its own partnerships with statutory bodies, including the Utility Regulator, NI Housing Executive, and Consumer Council for NI.
- **One Stop Shop:** The draft strategy highlights the Department for Economy's commitment to establish a One Stop Shop, however, it remains unclear when this will be the case, who will deliver it and how it will operate. Simplifying referral processes, making access to services less bureaucratic, and working with trusted organisations and networks is crucial to ensure timely and appropriate assistance reaches those who need it.
- **Energy Communities:** We strongly support the proposal to establish a taskforce to develop frameworks for Energy Communities. This should consider ways to empower individuals and communities to engage in energy projects and address barriers to participation. Building community resilience is essential in the transition to sustainable energy. The taskforce should engage with existing community energy projects, such as the Sustainable Energy Communities NI project, to learn from their experiences and insights.
- **NICE NG6:** It's been nearly 10 years since NG6 was endorsed in NI. We strongly recommend a review to assess the effectiveness of current implementation and identify areas for improvement, to prevent excess winter deaths and illness associated with cold homes.
- **Emergency Support:** We fully support the objective that DfC will work with organisations that provide emergency support, to seek a consistent approach across NI and the inclusion of a referral to a long-term solution. However, the draft strategy lacks detailed policy proposals on *how* this will be achieved. This needs to be addressed.
- **Changes to the Winter Fuel Payment:** FPC members remain deeply concerned about the changes to the Winter Fuel Payment eligibility, which leave many low-income, vulnerable pensioners – especially those just above the threshold – without support, increasing their risk of living in cold, damp homes. Older people can also face additional energy expenses due to disability or care needs, and they are more likely to have larger heating bills due to

living in poorly insulated homes with inefficient heating systems. While further analysis of the changes' impact should be conducted, it won't address the immediate issues for next winter. Urgent action is needed to plan and provide support for affected pensioners now and in the years ahead.

### **Protect Consumers**

The FPC supports the ambition of informed, protected consumers that have access to essential, sustainable and affordable energy. However, we believe this section of the draft strategy, in particular, requires more tangible actions and a clearer demonstration of how this objective will be achieved.

- **Consumer Understanding of Energy:** DfC and DfE should work with and support organisations that provide information, training and tools to help consumers better understand and manage their energy usage and support a Just Transition to Net Zero.
- **Targeted Affordability Support:** Households remain in crisis over energy bills. The FPC supports the introduction of an energy social tariff to support low-income and vulnerable households with unaffordable energy bills. We agree that DfC should investigate targeted affordability support further, including how those with higher energy needs will be supported – and believe this exploration should be happening already.
- **Identifying Vulnerable Households:** Vulnerability is fluid, and any consumer can be at risk given a particular set of circumstances. In identifying vulnerable households, consideration needs to be given to households with older people, babies and young children, pre-payment meter users, those with physical, sensory or learning disabilities or medical conditions, digitally excluded households, PRS tenants, rural residents, and those for whom English is not their primary language.<sup>5</sup> Energy suppliers need to be more proactive in identifying and supporting vulnerable customers, including better promotion of customer care registers.
- **Consumer Protection across Energy Efficiency Schemes:** Government should adopt a common quality assurance standard or framework across all energy efficiency and low carbon heat grant schemes, ensuring installer certification, workforce growth, and a coordinated approach to enhance consumer confidence and protection.

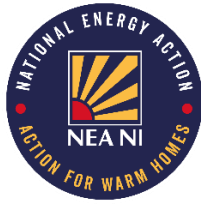
### **Governance and Accountability**

- **Basket of Indicators Approach:** We sincerely welcome this approach and the commitment to better utilise data and research from other organisations, to build a clearer picture of fuel poverty and energy wellbeing and inform the design and delivery of targeted policies.

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<sup>5</sup> For further information see: Fuel Poverty Coalition Northern Ireland, (2023). *'A New Fuel Poverty Strategy for Northern Ireland'*, pp. 9 – 10.

- **Set Statutory Fuel Poverty Targets:** NI is the only region in the UK without such targets, contributing to lagging progress in monitoring and intervention. We are deeply concerned that the draft strategy lacks measurable targets for reducing fuel poverty. To support effective delivery and cross-departmental collaboration, the strategy must be supported by legislative targets that align with the NI Climate Change Act and the Energy Strategy for NI.
- **Coordination across Strategies and Departments:** Effective cross-departmental and inter-departmental collaboration is crucial to deliver the goals of this strategy and related strategies, including the Energy Strategy and Housing Supply Strategy. It is imperative that DfC urgently delivers an Anti-Poverty Strategy for NI.



*Note: This consultation response reflects the overarching views of the Fuel Poverty Coalition Northern Ireland. Some organisations may be submitting their own response on behalf of their respective organisations. In some instances, there might be minor variances in opinion on the finer details between those organisations, but broadly-speaking, the collective view of the coalition is represented here.*