



SVP Response to the Draft National Mitigation Plan March 2017 April 2017

St Vincent de Paul welcomes the opportunity to input into the draft of Ireland's first National Mitigation Plan. We have focused our input on the third chapter of the plan which considers energy efficiency in the built environment, as most relevant and connected to the experience of our members on the ground.

Energy Efficiency in the Built Environment	
<p>1. What further practical measures could be introduced to encourage and enable householders in undertaking deep energy efficiency renovations to their homes?</p>	<p>We suggest the following measures to encourage and enable householders in undertaking energy efficiency renovations to their homes.</p> <ul style="list-style-type: none"> a) We suggest that DCCAE should pilot 'Community Energy Advisors' to advise and inform hard to reach energy users who would most benefit from energy efficiency and advice programmes. Having advisors based at the local level, who have local understanding and knowledge, could be an effective way to help support the uptake of schemes. b) Given the multitude of initiatives / schemes, we are keen to understand what initiatives are proving most effective, including identify barriers to uptake of schemes. We welcome the establishment of a Behavioural Economics Unit in SEAI in 2017. We understand its aim is to better understand the important role that behavioural economics and psychology plays in decision making and to encourage and facilitate more people choosing energy efficient and sustainable options. This will provide input to policy development and coordinate with the use of this discipline across wider government policy formation. The unit will trial and test interventions including how best to communicate effectively with target groups to achieve the desired outcomes and will assess impacts. We propose that one of the groups that should be targeted for analysis by this unit is those in energy poverty. While this group can be difficult to identify with total clarity there are many proxies for such households. We believe that with analysis by this unit, more appropriate and tailored dissemination and outreach

	<p>initiatives/campaigns towards the vast number of households in energy poverty could be more successful.</p> <p>c) Finally, in posing the question specifically referring to ‘undertaking deep energy efficiency renovations’, it would be useful and important to clarify whether the Government is precluding measures to continue to improve energy efficiency on a more incremental basis for those that can afford to do so?</p>
<p>2. How should the Government support those who do not have the financial means to engage in renovations, for example those in energy poverty?</p>	<p>As part of the Energy Efficiency Obligation Scheme (EEOS), energy suppliers are obliged to achieve energy savings each year to 2020 of at least 1.5% of annual energy sales to final customers. This has further been allocated by sub-sector, with 5% allocated to those at risk of energy poverty in the residential sector. The sub-sectors of the EEOS should be reconsidered, recognising that it can be used as a mechanism to financially support energy measures in the residential sector. Additional costs, however, should not be passed onto the consumer through higher energy bills.</p>
<p>3. How can we motivate the construction industry to promote deeper energy renovations to their clients?</p>	<p>While we do not have specific experience on motivating the construction industry to promote energy renovations, we would echo concerns raised at last year’s conference in Brussels: <i>Ending Energy Poverty in Europe: Towards an Inclusive Energy Union</i>, in July 2016. A key note speaker identified the need to upskill and improve the energy knowledge and skills of the professions in the construction sector to ensure quality low energy construction. They further maintained that the construction industry in Europe is currently incentivised to be low cost and low tech. The only relevant initiative outlined in the National Mitigation Plan is the Green Building Council whose role is promote up to date skills and knowledge in the construction sector to deliver a high standard of build and best practice in energy efficiency.</p> <p>While we support this initiative, our concern is that the rapid expansion of retrofit schemes without the appropriate levels of skills, knowledge and proper standards compliance carry the risk that such investment will not be effective especially for vulnerable households.</p> <p>In relation to Approved Housing Bodies and other housing associations that receive government funding such as Capital Advance Leasing Facility (CALF) and Capital Assistance Scheme (CAS) to undertake construction, cognisance should be given to the additional and higher cost associated with improved energy efficiency measures for homes.</p>

<p>4. For those householders and businesses that have carried out energy efficiency improvements, how should we encourage the adoption of low carbon heating solutions, including those that would facilitate the decarbonisation of electricity generation?</p>	
<p>5. How could the regulatory regime be developed to best complement Government incentives and supports for the residential and commercial sectors post-2020?</p>	<p>Recognising that those living in rented accommodation are twice as likely to live in a home with a poor energy efficiency rating than a homeowner, one of the key means of support the Government can provide to those in energy poverty is the provision of minimal standards for the rental sector. Such households do not have the financial means or legal right to engage in renovations, and the divergent incentives present in the rental sector mean that energy efficiency investment is much lower in the Private Rental Sector than among homeowners. It is important that the research and planned accompanying consultation paper on minimum energy efficiency in the rental sector are published as soon as possible, recognising that it will take time for landlords to carry some of the work involved. When so doing, consideration should be given to the protection against unintended consequences which might encourage landlords to exit the rental market. Legislation should be balanced with incentives to encourage and support landlords to reach new minimum energy efficiency standards.</p> <p>At the same time, the inspection capacity of Local Authorities will need to be strengthened, and the requisite resources ensured, in order to increase the number and frequency of inspections.</p> <p>In addition, much of response to Q1 above applies here as well. We believe that better analysis/understanding of what initiatives are proving most effective and identifying barriers to uptake of schemes is needed. Based on this analysis, an appropriate and tailored dissemination and outreach initiative/campaign can be designed to target the vast number of households that are eligible to avail of the Warmer Home Scheme. Having advisors, based at the local level could be an effective way to help support the uptake of schemes. Such measures may need to be supported and followed up by additional regulation to reach unaware or disengaged consumers. A recommendation proposed in the SEAI 2015 report 'Unlocking the Energy Efficiency Opportunity' of introducing 'consequential improvements' regulations for all domestic and non-domestic buildings, should also be explored further.</p>

