

# Submission on the Development of Ireland's Social Climate Plan

**To: Department of Climate, Energy and the Environment**

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## Introduction

The Society of St Vincent de Paul (SVP) welcomes attention to the impacts that the energy transition has and will have on vulnerable groups, most particularly those in poverty. We are a member-led organization with over 10,000 members in communities across Ireland. Our members visit people in their own homes and provide support rooted in dignity and autonomy—the unique insights of our members form the basis for this submission. In 2023, we provided €43.6 million in direct supports to households in need. Difficulties with energy costs are continuously among the most common reasons individuals request our support.

This submission primarily addresses ‘*vulnerable households*’ and ‘*vulnerable transport users*’. We address vulnerability in the context of energy poverty, as in those in energy poverty are most vulnerable to carbon pricing and other energy price increases.

## Energy poverty and existing schemes

In Ireland, energy prices have risen by 69% and 102% since January 2021<sup>1</sup>. CSO SILC deprivation data shows a continued rise in energy hardship<sup>2</sup> and CRU data finds rising levels of arrears and a growing average value of those arrears<sup>3</sup>. These trends are mirrored in requests for assistance from SVP. Several groups are disproportionately affected by high energy prices: one parent households, renters, people who are unemployed, and people with disabilities. CSO SILC data from 2024 suggests 13% of one parent households and 11.4% of those unable to work due to long-term health issues have been unable afford to keep the home adequately warm in the last year. 13.2% of renters have gone without heating in the last year.

Research suggests this hardship has long-term social and health implications. Cold and energy-inefficient homes contribute to higher rates of respiratory and cardiovascular sickness. At the extreme, these issues contribute to excess winter mortality in Ireland. Recent research among children has found that energy poverty has negative cumulative effects on children’s mental health and educational results<sup>4</sup>.

Transport poverty lacks a coherent definition. Broadly, it refers to a combination of lack of services, inaccessibility, and unaffordability. Transport poverty is often linked to energy poverty, in part because of the costs of private vehicle use or of accessing public transportation.

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<sup>1</sup> CRU (2025) CRU Decision on Additional Customer Protection Measures for Household Electricity and Gas Customers 2025/26. <https://www.cru.ie/publications/28754/>

<sup>2</sup> Central Statistics Office (2025) Key Findings on Survey on Income and Living Conditions (SILC): Enforced Deprivation 2024. <https://www.cso.ie/en/releasesandpublications/ep/p-silced/surveyonincomeandlivingconditionssilcenforceddeprivation2024/>

<sup>3</sup> CRU, *ibid*.

<sup>4</sup> Da Silva Pedroso, M., Winston, N. Dingley, O. et al. (2025). Improving Child Wellbeing: The Effects of Transport and Residential Energy Poverty on Education and Mental Health of Children and Adolescents. *Child Indicators Research*. <https://doi.org/10.1007/s12187-025-10284-0>

We note that though there is a lack of official data on the rates of energy poverty and transport poverty in the Traveller community, studies from the MOBILISE project and MABS suggest that Travellers experience high rates of energy poverty and have greater reliance on fossil fuels, making them more vulnerable to energy price increases<sup>5</sup>. Travellers are currently excluded from many existing support schemes.

The EU Social Climate Fund is an opportunity for Ireland to support groups that are under-targeted by our existing 'just transition' and energy poverty measures. Unfortunately, several of these groups, particularly renters, are under-targeted by existing programmes such as the National Home Energy Upgrade Scheme and the Warmer Homes Scheme. Though the Warmer Homes Scheme expressly targets low-income households for complete financing of energy renovations, this is only available to homeowners in receipt of social welfare benefits. Many individuals are excluded as they cannot afford home ownership. The high upfront costs of the One Stop Shop further exclude low-income households.

A focus on energy efficiency in national programmes also fail to address energy poverty in its entirety. Recent research by the ESRI suggest that improvements to buildings' energy efficiency yield only modest results in addressing overall energy poverty, and a more robust framework tackling inequality and income adequacy is needed<sup>6</sup>. Improvements to energy efficiency are essential, however, they only form one part of the picture. As was recently highlighted by NESC, energy poverty is about a "focus on people, in all their various circumstances, as much as it is about improving buildings, networks and reducing emissions"<sup>7</sup>.

Unless programmes are developed to adequately target those most impacted by higher energy costs, Ireland's energy transition risks exacerbating existing inequality. Recent Pobal research demonstrates that communities with greater shares of these vulnerable groups are 'the least likely to benefit from household renewable energy sources'<sup>8</sup>. Affluent areas, meanwhile, see the greatest uptake in household renewable energy. Renewable energy in Ireland therefore 'acts as an additional layer of protection for an already affluent population'.

## The EU Social Climate Fund

Our submission to this consultation on the Draft Social Climate Plan is made with this existing energy poverty context in mind. The impacts of carbon taxes and any associated

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<sup>5</sup> National Traveller Money Advise & Budgeting Service (MABS) (2019). Accommodating Ethnicity: Addressing Energy Poverty Among Travellers Living in Mobile Homes and Trailers.

[https://www.citizensinformationboard.ie/downloads/social\\_policy/MABS\\_Energy\\_Poverty\\_Report\\_2019.pdf](https://www.citizensinformationboard.ie/downloads/social_policy/MABS_Energy_Poverty_Report_2019.pdf)

<sup>6</sup> Estévez, Andres and Miguel Tovar (2024). ESRI Working Paper: Empowering Homes? Unravelling the Connection Between Energy Efficiency and Well-being.

<https://www.esri.ie/system/files/publications/WP784.pdf>

<sup>7</sup> Johnston, Helen (2025). Energy Transition as an Opportunity to Eliminate Energy Poverty. National Economic & Social Council, Secretariat Paper No. 36. <https://www.nesc.ie/publications/energy-transition-as-an-opportunity-to-eliminate-energy-poverty/>

<sup>8</sup> Pobal (2025). Renewable Energy and Deprivation. <https://www.pobal.ie/wp-content/uploads/2025/09/250298-Renewable-Energy-Research-Report-2025-FINAL-190925.pdf>

changes to Ireland's energy infrastructure will be felt most by those already experiencing energy poverty. These are households least able to make behavioural changes to adapt to carbon pricing. The EU Social Climate Fund explicitly targets energy poverty. Ireland's Social Climate Plan should therefore target energy poverty across its supports and mechanisms.

Vulnerable groups in the Social Climate Fund are more simply be identified as those who spend a larger share of their income on energy and/or transport; do not have access to adequate and/or affordable alternative transport; and do not have the financial capacity to invest in low-carbon options in response to higher fossil fuel prices. Within Ireland, vulnerable households/transport users are therefore those groups identified above: renters, lone parent households, households with a disability, and the unemployed. Vulnerable groups are those at greatest risk of energy poverty.

Our recommendations for the Draft Social Climate Plan are:

1. The Plan should specifically target energy poverty within its measure of 'vulnerability' to ensure Funds support those at greatest risk of harm from rising energy prices.
2. That it should target groups who are currently not targeted by existing energy transition schemes, or who under-participate in these schemes despite attempted targeting.
3. The Plan should include supports that do not rely on home ownership for eligibility and address landlords' 'split-incentives'.
4. Learnings from existing schemes should be considered and applied in the development and implementation of this Plan.
5. Broadly, that the Plan and its associated funds be used as an opportunity to address current gaps and barriers in the 'just transition' through evidence-based, targeted supports.

## **Prioritising Vulnerable Groups**

### **Identifying Vulnerability**

SVP recommends that 'vulnerable groups' be defined explicitly in terms of energy poverty, as those in energy poverty are most vulnerable to increases in energy costs as a result of carbon pricing.

These groups should be identified based on outcome and experience with energy, not energy efficiency or income alone. Those most vulnerable to increased energy prices are those already in or at risk of energy poverty; energy poverty is ultimately about going without the energy needed to stay safe, warm, and healthy due to cost. The CSO's SILC data on deprivation, for example, provides a helpful measure of those groups most vulnerable to increases in energy costs. SILC data repeatedly suggests that unemployed people, one parent families, renters, and people unable to work due to ill-health are most likely to go without heating and/or be unable to keep the home adequately warm.

In conceptualising vulnerability broadly across households, the Social Climate Plan must pay due attention to income, housing tenure and quality (including BER ratings), household types

(people with disabilities, lone-parent households, older people living alone), and marginalised groups such as the Traveller community. We appreciate attention to differences between urban and rural households, who ordinarily face higher household energy costs and greater transport costs.

Identifying vulnerability through energy poverty cannot rely on high energy expenditure or energy inefficiency alone. Households who self-ration energy out of a fear of bills and inability to afford adequate heat, as well as others who lack the funds to spend a high amount on heat, should be recognised as vulnerable within the Plan. Additionally, though low-energy efficient homes are associated with greater costs and higher rates of energy poverty, low-income households may be unable to afford energy even in high-efficiency homes. Identification and targeting of vulnerable households within the Social Climate Plan cannot be based on energy efficiency alone.

#### *Targeting Vulnerable Groups (Effective mechanisms etc)*

The Social Climate Plan should, where possible, make use of existing mechanisms targeting energy poverty. Fuel Allowance eligibility and eligibility for other social welfare payments, for example, should be used as criteria for support under the Plan.

SVP encourages the Plan to avoid mechanisms that prevent vulnerable groups' participation in existing schemes. In particular, we strongly suggest the Plan develops mechanisms that do not rely on homeownership. Many of those most vulnerable to price increases are also more likely to be renters: one parent families, for example, are more likely to live in rented accommodation. The current model of home ownership required by existing schemes also excludes much of the Traveller community. Given measures adopted under this Plan must, under EU guidelines, be *additional* to existing initiatives, we stress that this Plan should avoid replicating barriers in current programmes.

### **Prioritisation of Vulnerable Groups**

We acknowledge that the consultation asks for a prioritisation of vulnerable groups and propose an alternative prioritisation that provides more specific targeting of vulnerable households.

- 1. Vulnerable households: currently unsupported/untargeted by existing schemes.**  
Social housing tenants; lone parent households; private renters; people with disabilities; Travellers.
- 2. Vulnerable households: in need of greater targeting.**  
Low-income owners (pensioners currently well targeted).
- 3. Vulnerable transport users.**  
We place this after the above groups, given the risks associated with a cold home. The relationship between household energy poverty and transport poverty should be stressed, as those unable to afford transport are often themselves members of the households above.
- 4. Vulnerable micro-enterprises.**

The aim of the EU Social Climate Fund, to be distributed according to this Plan, is to address the vulnerability of those in energy poverty. Households and transport users should therefore be given priority.

#### *Prioritisation within the provided framework*

Within the prioritisation framework proposed, SVP's preference is the same across Urban & Rural households, transport users, and micro-enterprises. Light and warmth in households is paramount. While we acknowledge that rural households are more vulnerable to high transport costs, we also acknowledge that these households face higher household energy costs.

The geographic distribution of energy efficiency and renewable energy uptake should be considered. We note that renewable energy uptake is lower in rural areas, particularly in the North West of Ireland<sup>9</sup>. However, most metropolitan areas in Ireland have similarly limited uptake of renewable energy, particularly in the 'core' city. These discrepancies align with existing location-based deprivation measures. Though our prioritisation is the same across Rural and Urban groups, any proposed supports must address differences between these groups to ensure adequate targeting. Areas 'left behind' in these schemes will be more vulnerable to energy poverty and carbon pricing.

#### *Rural Prioritisation*

- 1. Rural Vulnerable Households:** Rural households see higher electricity prices and greater reliance on oil than their urban counterparts, resulting in higher energy costs overall. Further, rural areas often have older, less energy efficient housing stock.
- 2. Rural Vulnerable Transport Users:** rural households continue to rely on private transport as a minimum essential need given the limited and inadequate public transport provision in rural areas. This is a marked difference between rural households and urban households, which the Minimum Essential Standard of Living (MESL) Research Centre finds are able to meet minimum transport needs through use of a Leap card.
- 3. Equal priority for all groups:** Though SVP encourages a clear prioritisation of groups to ensure the needs of households are met before those of micro-enterprises, our preference would be for equal prioritisation above a prioritisation of micro-enterprises.
- 4. Rural Vulnerable Micro-Enterprises:** Energy poverty, which should be prioritised in this Plan, is a household and individual issue. That said, we acknowledge the need to provide supports to micro-enterprises, who may otherwise pass on costs to their customers, or shut down and place employees at greater risk of energy poverty.

Rural households face greater household energy costs because of older, less efficient housing stock and higher baseline costs of heating the home. Higher home energy costs for rural households are driven by higher electricity costs and higher costs associated with home heating oil.

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<sup>9</sup> Pobal (2025). Renewable Energy and Deprivation. <https://www.pobal.ie/wp-content/uploads/2025/09/250298-Renewable-Energy-Research-Report-2025-FINAL-190925.pdf>

As a result of inadequate public transportation, rural households see higher transportation costs. Within MESL research, private vehicles are a minimum need for rural households; this is not true of their urban peers. High fuel costs therefore will have a greater impact on rural households, with households in energy poverty at even greater risk.

Rural vulnerable households and rural vulnerable transport users should be given priority above rural vulnerable micro-enterprises. Households and the people in them, not enterprises, suffer from energy poverty, and should therefore be the target of measures to reduce the impact of carbon pricing and other energy transition measures. Vulnerable transport users are also members of households: greater transportation costs impact on the affordability of keeping the home warm, and vice versa. Priority has been given to households over transport users because of the long-term health impacts of inadequately heated homes.

#### *Urban Prioritisation*

- 1. Urban Vulnerable Households:** Energy poverty is primarily a household issue, experienced as an inability to adequately heat the home and keep lights on. These groups are most vulnerable to increased energy prices and must be given priority. Urban areas see many living in the private rental sector, placing them at greater risk of energy poverty. This includes groups such as lone parent households, who are more likely to rent.
- 2. Urban Vulnerable Transport Users:** In contrast to their rural counterparts, MESL research suggests urban households are often able to meet their transport needs through use of public transport Leap cards. However, individuals in shift work and people with disabilities may still face high transport costs and limited access. In addition, we note that under the definition of urban area (a population of more than 1,500), many 'urban' transport users may face high transport costs as a result of infrequent and inadequate public transport services.
- 3. Equal priority for all groups:** Again, SVP supports prioritisation of households and transport users first, as they are the groups most at risk of energy poverty and the related long-term risks of inadequate heating and connection. However, we would favour equal prioritisation in lieu of a plan that prioritised micro-enterprises over these most vulnerable groups.
- 4. Urban Vulnerable Micro-Enterprises:** Again, we stress that given the EU guidelines for the Social Climate Fund target energy poverty, absolute priority should be given to vulnerable households and transport users. However, we acknowledge that without support, micro-enterprises may pass costs on to customers or face closure, risking local employment.

As with our prioritisation of vulnerable groups in rural areas, SVP recommends that urban vulnerable households and urban vulnerable transport users be given priority above vulnerable micro-enterprises. Though micro-enterprises are understandably vulnerable to increased energy prices and play important roles in local employment, this Plan should prioritise groups at risk of energy poverty. Household energy costs (both because of baseline costs and low-efficiency homes) and transportation costs both contribute to an

inability to afford energy. Because of the long-term impacts of inadequately heated homes on health, and associated mortality risks, priority must be given to households over transport users. Measures to improve costs of household energy use will be of benefit to transport users, who are part of households.

## **Prioritisation of Measures and Investments in Rural Areas for Vulnerable Groups**

### **Rural Vulnerable Households**

#### *Prioritisation of Suggested Supports*

1. Building retrofit supports for vulnerable households in local authority social housing.
2. Building retrofit supports for vulnerable households in approved housing body social housing.
3. Building retrofit support for vulnerable households in old energy poor buildings.
4. Building retrofit supports for vulnerable households in privately owned dwellings.
5. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in privately owned dwellings.
6. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in social housing.
7. Support for One-Stop-Shop Energy Efficiency Information Hubs for vulnerable households
8. Build new social housing units for local authorities for vulnerable households.
9. Conversion of vacant and derelict commercial properties into social housing for vulnerable households.
10. Support development and provision of appropriate funding instruments in line with the Social Climate Plan's goals (e.g. low-cost retrofit loans) for vulnerable households
11. Other measure or investment for the building sector.

#### *Explanation of Preference*

Among the measures proposed, retrofit schemes for vulnerable households in local authority social housing and approved housing body (AHB) social housing should be prioritised. These households are less able to 'choose' to participate in existing schemes as non-owners of their dwellings. These are followed by retrofit supports for energy poor households in old energy poor buildings and in privately owned dwellings. SVP stresses that any supports to landlords must be contingent on security of tenure for their tenants.

Integrating renewable energy solutions should be prioritised after the above and where possible should be implemented alongside retrofit measures to achieve their intended effects. Within this, priority should again be given to households in social housing, AHB social housing, as households most at risk of energy poverty. As with retrofit supports, attention will need to be paid to implementation for private renters to ensure that incentives for landlords are conditional on security of tenure.

Within these supports, we suggest that attention is paid to ensuring that the renewable technologies and energy efficiency measures adopted are appropriate to the needs of the household. For example, heat pumps are often incompatible with prepay meters in situations where self-disconnection (due to inability to 'top-up') are likely. Any measures must be appropriately communicated to households to ensure they are properly adopted, avoiding inefficient usage and unaffordable energy bills. One-Stop-Shop Energy Efficiency Information Hubs offer significant support in this regard, ensuring targeted households have access to information on funding and can receive support for new technologies. These hubs should be integrated in communities and have contact with energy suppliers to ensure vertical cooperation.

New builds are much needed to address the housing crisis; costs associated with housing restrict households' ability to afford energy bills. Retrofit schemes and renewable energy solutions are prioritised above these measures because they more specifically target energy poverty and have the most immediate impact.

SVP would not support schemes offering loans to households in energy poverty. Any measures should be grants-based. Households are already in high rates of arrears for electricity and heating and should not be put in additional debt to improve the efficiency of their homes.

We note that the suggestions concerning vulnerable households in 'privately owned dwellings' are unclear: schemes must differentiate between energy poor renters and owners in energy poverty to ensure vulnerable groups are well-targeted. Renters should be prioritised as more likely to experience energy poverty, with many of the most energy poor groups (lone parents, for example) being more likely to be in privately rented accommodation. Owners of privately-owned dwellings are already eligible for the existing Warmer Homes Scheme.

### *Other Measures*

#### **1. Measures for renters.**

The majority the households SVP supports with energy costs are social and private renters. These households are less able to improve the energy efficiency of their homes and are often struggling both with high rents and high energy costs. Many may fall into both rent and energy arrears as a result.

Measures to address the 'split-incentives' between landlords and renters & ensure improved energy efficiency does not result in 'renovictions' are needed within the Plan. Any such measures must incorporate learnings from, for example, the tax incentive for landlords, which has seen low uptake and lacks targeting to landlords with tenants in energy poverty.

Any measures that improve energy efficiency or introduce renewable energy to private rented homes must be designed to prevent evictions following improvements. Landlords' incentives must be conditional on an enhanced security of tenure for their tenants. For

example, SEAI grants could be extended to landlords who provide properties to HAP tenants, conditional on a minimum 5-year lease.

## **2. Measures targeting households with children**

Measures such as retrofitting grants must target households with children, particularly given the long-term health and psychological impacts of an inadequately heated home. Current schemes offer retrofits to homeowners, excluding families with children experiencing energy poverty, who often do not own their home.

Children were a focus of the Warmth and Well-Being Pilot, which included those living in social housing. Learnings from this pilot could be incorporated into measures targeting children under the Social Climate Plan. Further, measures under this plan must form part of an overall strategy by the DCEE and the Department of an Taoiseach's Child Poverty and Well-Being Programme Office.

## **3. Measures targeting individuals with a disability.**

Priority within structural schemes should take account of disability, as individuals with a disability often have greater energy needs for assistive medical equipment and often must use more energy to stay warm.

In addition to broader targeting for this group, simple extensions to existing programs would provide greater support for individuals with a disability. Currently, recipients of the Disability Allowance are only eligible for free energy upgrades if the household has a child under the age of 7. Though targets to address children in energy poverty are needed, this is not the solution. Free energy upgrades should be available to all households in receipt of Disability Allowance.

## **4. One-Stop-Shop Energy Efficiency Information Hubs should provide information and support beyond energy efficiency as part of a wrap-around energy advice service.**

In a report commissioned by SVP in 2023, 'Keeping the Lights On: Pathways through energy hardship and support', SVP found that access to energy-specific advice is extremely limited and that not all energy customers know of their options or have the confidence to choose better options (e.g: switching between tariffs or providers)<sup>10</sup>. Bills are difficult to understand, particularly as tariffs become increasingly complex. Combined, these factors leave those experiencing energy poverty scared of engagement with suppliers and unsure of larger changes for energy efficiency.

## **Rural Vulnerable Transport Users**

### *Prioritisation of Suggested Supports*

1. Improve availability and accessibility of Public Transport for vulnerable transport users

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<sup>10</sup> Society of St Vincent de Paul (SVP) (2023). Keeping the Lights On: Understanding Pathways Through Energy Hardship and Support. [Keeping-the-Lights-On.pdf](#)

2. Improve performance, scale and frequency of existing Public Transport for vulnerable transport users.
3. Financial incentives for using and making public transport more affordable for vulnerable transport users
4. Support public, private and community entities in providing sustainable mobility options such as mobility hubs and on-demand shared services including shared bikes, e-scooters and electric vehicles for vulnerable transport users.
5. Support for private and commercial bicycles, electric bikes, and cargo bikes and related facilities for vulnerable transport users.
6. Support for private and commercial zero/low emissions vehicles and related infrastructure for vulnerable transport users
7. Other measures or investment in the transport sector.

### *Explanation of Preference*

Structural measures should be given priority over individualised solutions to transport poverty. Without reliable, frequent, and widespread public transport, rural transport users are more reliant on private vehicles and therefore more vulnerable to increases in fossil fuel prices. The primary barrier rural vulnerable transport users face is the non-existence of services. Improving availability, accessibility, scale, and frequency of existing Public Transport is therefore most important to provide a real alternative to costly private vehicle usage. This should be accompanied by financial incentives to make public transportation more affordable.

In addition to improving and expanding public transportation, space must be given to alternative solutions in areas where public transportation is impractical. This is particularly true of remote communities. Community-based mobility hubs and shared services may play an important role in these areas and allow flexibility for communities facing gaps in public transportation.

### *Other Measures*

The above measures should include supports to ensure accessibility for the elderly, for people with disabilities, and for shift workers who may work late hours which fall outside of standard public transportation timetables. These groups experience greater energy poverty and would most benefit from affordable public transportation.

Additional measures include improved public transportation connections, including cycling and walking connections.

## Prioritisation of Measures and Investments in Urban Areas for Vulnerable Groups

### Urban Vulnerable Households

#### *Prioritisation of Suggested Supports*

1. Building retrofit supports for vulnerable households in local authority social housing.
2. Building retrofit supports for vulnerable households in approved housing body social housing.
3. Building retrofit support for vulnerable households in old energy poor buildings.
4. Building retrofit supports for vulnerable households in privately owned dwellings.
5. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in privately owned dwellings.
6. Integrating renewable energy solutions for generation, storage and consumption for vulnerable households in social housing.
7. Support for One-Stop-Shop Energy Efficiency Information Hubs for vulnerable households
8. Build new social housing units for local authorities for vulnerable households.
9. Conversion of vacant and derelict commercial properties into social housing for vulnerable households.
10. Support development and provision of appropriate funding instruments in line with the Social Climate Plan's goals (e.g. low-cost retrofit loans) for vulnerable households
11. Other measure or investment for the building sector.

#### *Explanation of Preference*

As with rural vulnerable households, retrofit schemes and integrated renewable energy solutions should be prioritised. These schemes can be more focused to support households in energy poverty and yield more immediate solutions. Households in social housing, in AHBs, and in the private rental sector should be prioritised within these schemes.

Any new technologies must be tailored to the needs of the household to ensure alignment between energy use, affordability, and the technology in question. A 'one-size-fits-all' approach risks delivering higher energy bills for households. To support these measures, One-Stop-Shop Energy Efficiency Information Hubs should be established in collaboration with local community groups and have clear lines of communication with energy suppliers, the SEAI, and relevant Departments.

Any schemes relating to vulnerable households in 'privately owned dwellings' should distinguish between renters and owners. Renters are excluded from current structural schemes and should be given priority in any new schemes funded through the EU SCF.

Though new builds are critical to addressing the housing crisis, retrofit schemes & renewable energy solutions should be given priority because these measures more specifically target energy poverty.

SVP does not support loans to households in energy poverty. The CRU is already reporting high levels of arrears in domestic electricity and gas accounts. Households should not be placed in additional debt to improve the efficiency of their homes.

### *Other Measures*

#### **1. Measures for renters.**

The majority the households SVP supports with energy costs are social and private renters. These households are less able to improve the energy efficiency of their homes and are often struggling both with high rents and high energy costs. Many may fall into both rent and energy arrears as a result. We therefore welcome measures targeting households and AHBs. However, greater attention will need to be paid to targeting private renters, for whom structural changes to the home carry risk, even where landlords choose to participate in programs.

The Plan should adopt measures that address the ‘split-incentives’ between landlords and renters and prevent ‘renovictions’. Landlords’ incentives must be conditional on an enhanced security of tenure for their tenants. For example, SEAI grants could be extended to landlords who provide properties to HAP tenants, conditional on a minimum 5-year lease. Measures should not be adopted where they risk security of tenure and benefits to the landlord would not be passed on to renters in energy poverty.

#### **2. Measures targeting households with children**

Measures should target households with children to prevent the long-term health and psychological impacts of an inadequately heated home. Current schemes exclude many households with children by limiting inclusion to homeowners.

Any measures targeting children should be part of wider strategy from the DCEE and the Department of an Taoiseach’s Child Poverty and Well-Being Programme Office. Learnings from the Warmth and Well-being Pilot should be incorporated into these supports.

#### **3. Measures targeting individuals with a disability.**

Individuals with a disability often have greater energy needs to stay warm and for assistive medical equipment. Any schemes should take due account of these energy needs. Measures may include expansion of existing retrofit programs to include all recipients of the Disability Allowance.

#### **4. One-Stop-Shop Energy Efficiency Information Hubs should provide information and support beyond energy efficiency as part of a wrap-around energy advice service.**

Energy efficiency is only one facet of energy poverty: energy costs themselves and relationships with suppliers is another. Research commissioned by SVP in 2023 found that access to energy-specific advice is limited and that bills are difficult to understand. These factors, among others, leave those in energy poverty unable to engage confidently with suppliers and reduce their participation in energy efficiency schemes. A wrap-around energy

service would ensure a clear throughline of support, directly targeting energy poverty as an experience and outcome.

## Urban Vulnerable Transport Users

### *Prioritisation of Suggested Supports*

1. Improve availability and accessibility of Public Transport for vulnerable transport users
2. Improve performance, scale and frequency of existing Public Transport for vulnerable transport users.
3. Financial incentives for using and making public transport more affordable for vulnerable transport users
4. Support public, private and community entities in providing sustainable mobility options such as mobility hubs and on-demand shared services including shared bikes, e-scooters and electric vehicles for vulnerable transport users.
5. Support for private and commercial bicycles, electric bikes, and cargo bikes and related facilities for vulnerable transport users.
6. Support for private and commercial zero/low emissions vehicles and related infrastructure for vulnerable transport users
7. Other measures or investment in the transport sector.

### *Explanation of Preference*

Structural measures to improve and expand existing Public Transport should be given priority over private, individualised solutions. Given some smaller ‘urban’ areas may still see a lack of public transportation, improved availability should be a continued priority for urban areas. Improved accessibility, availability, performance, and affordability must include improved access for shift workers, older people, and people with disabilities, who face barriers to public transport use even in urban areas where public transport is more frequent and widespread.

Community-based measures such as mobility hubs may provide flexibility to fill gaps in public transportation.

### *Other Measures*

The above measures should provide affordable, accessible public transportation to people with disabilities, older people, and those in need of services outside of ordinary hours (e.g.: shift workers). Additional measures may be needed to provide necessary supports to these groups. Further measures may include improved public transportation connections, particularly walking and cycling connections.

## General Comment (1500 word limit)

### 1. Governance and stakeholder structures

Recent guidance from the EU highlights that Member States' plans must not only introduce measures to address vulnerability to price increases but must establish clear structures to ensure funds are effectively used for targeted groups<sup>11</sup>. This includes clear governance, monitoring, and stakeholder structures. This must include coordination across departments and with civil society, as well as the use of clear indicators to track progress within the Plan.

We stress that the EU Social Climate Fund Regulation (Regulation 2023/955) requires:

- An identification of vulnerable households, vulnerable micro-enterprises, and vulnerable transport users;
- Clear, evidence-based assessment of existing challenges for vulnerable households, transport users, and micro-enterprises;
- Criteria for the identification of eligible final recipients;
- A quantitative and qualitative justification for how measures are expected to reduce energy poverty, transport poverty, and the vulnerability of households to an increase in the price of road transport and heating fuel;
- Targets, indicators, and milestones for reducing vulnerable groups, to include justification for the choice, clear methodology and sources, and goals;
- The projected impact of the Plan on vulnerable groups;
- Demonstrate additionality, showing that measures are new or scaled up, not a rebranding of existing programs.

Given the detail required by the Plan and the systems required, SVP emphasises that in addition to this consultation, the Draft Social Climate Plan itself must be subject to an inclusive consultation process. The Draft must be sufficiently clear for transparent consultation on the targeting and identification of vulnerable groups.

### 2. Direct income supports

Up to 37.5% of Social Climate Funds may be used for time-limited, transitional direct income support. These potential supports are absent from this consultation. While it is understandable to prioritise long-term, stable initiatives, direct income supports have an important role to play in addressing the increased risks that carbon pricing and related measures have on those in energy poverty.

Inadequate income is an important part of energy poverty. Many groups most at risk of energy poverty in Ireland, and therefore most vulnerable within the terms of the SCF, receive income support through social protection that is inadequate to meet their needs. This inadequacy places households in the unacceptable position of choosing between heating

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<sup>11</sup> European Commission (2025). Commission Notice: Guidance on the Implementation of the Social Climate Fund. [Brussels, 9.10.2025 C\(2025\) 6732 final](#).

their homes or buying food. Any measures targeting energy poverty must address both structural causes and energy costs for these households.

Given the time-limited nature of any direct income supports under the Fund, SVP recommends that direct income supports be incorporated into the Plan as complements to proposed structural and transport schemes. For example, direct income supports could be provided to households on waiting lists for structural supports. Direct income supports could be implemented through the existing social protection payment system. Any such support must be blended across the Department's various schemes to prevent cliff-edges and allow flexibility where there are delays in retrofit or renewable energy provision.

### **3. Support to the Traveller community**

Traveller communities are structurally excluded from existing schemes and supports addressing energy poverty; this exclusion is facilitated and compounded by their invisibility in existing statistics. This is a group that experiences inadequate incomes and high unemployment, making them more vulnerable to increased energy prices. Most Travellers spend an average of €120 a week on fuel and electricity<sup>12</sup>. Further, they rely more on fossil fuels which are most affected by carbon taxes. Energy efficiency measures and direct income supports are needed to address the vulnerability of this group. This must be accompanied by greater engagement between the Department and Traveller communities to ensure that any programmes are sensitive to Travellers' experiences.

Because SEAI's homeowner grants—such as the Better Energy Homes and Warmer Homes schemes—require ownership of a permanent dwelling, they explicitly exclude mobile homes, caravans, and other temporary structures that comprise much of Traveller accommodation. This structural exclusion conflicts with the Public Sector Equality and Human Rights Duty<sup>13</sup>, which obliges public bodies to assess and address equality impacts across all functions. Without targeted measures for Traveller accommodation, strategies such as the SEAI's Equality, Diversity and Inclusion Strategy 2023-2025<sup>14</sup>, its energy poverty analyses, and Community Energy Grants demonstrate only partial compliance with this obligation. Responsibility for retrofitting Traveller group housing and halting sites currently falls to local authorities under Traveller Accommodation Programmes<sup>15</sup>; without coordinated funding and technical guidance from SEAI, these dwellings are effectively beyond national retrofit efforts.

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<sup>12</sup> National Traveller Monetary Advice & Budgeting Service (MABS) (2022). Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities. <https://www.ntmabs.org/images/resources/publications/policy/mobile-homes-energy-efficiency-report-2022.pdf>

<sup>13</sup> Government of Ireland (2014). Irish Human Rights and Equality Commission Act 2014, s.42 (Public Sector Equality and Human Rights Duty). *Irish Statute Book*. <https://www.irishstatutebook.ie/eli/2014/act/25/section/42/enacted/en/html>

<sup>14</sup> Sustainable Energy Authority of Ireland (SEAI) (2023). Equality, Diversity and Inclusion Strategy and Action Plan 2023–2025. <https://www.seai.ie/sites/default/files/publications/SEAI-EDI-Strategy-and-Action-Plan-2023-2025.pdf>

<sup>15</sup> Department of Housing, Local Government and Heritage (2023). Guidelines for the Preparation, Adoption and Implementation of Local Authority Traveller Accommodation Programmes 2025–2029 (issued with Circular Housing 46/2023). [Available here](#).

To fulfill its statutory duty, SEAI should undertake a formal equality impact assessment on Traveller accommodation, pilot appropriate retrofit measures in partnership with councils, and publish outcome data within its annual Public Sector Duty reports to ensure the energy transition does not perpetuate existing inequalities<sup>16</sup>.

Any targeting of the Traveller community must include a retrofit and renewable energy scheme tailored to the needs of mobile or temporary dwellings. Results from the MOBILISE project suggest that context-specific retrofit solutions such as insulation upgrades, more efficient heating systems, and solar panel installation should be developed and implemented<sup>17</sup>. Further measures could include supports for the purchase of energy efficient mobile homes, which research suggests are the main route to addressing the accommodation dimension of Travellers' energy poverty<sup>18</sup>. Costs for such units may be mitigated through buy-assistance or rent-to-own schemes. Measures adopted under the Plan to target the Traveller community should be developed through direct engagement with Travellers themselves to ensure accessibility and uptake.

#### **4. Microgeneration**

Research from SVP's MESL Research Centre has examined the minimum energy needs of different household types across varying BER levels and found that though increased energy efficiency reduces energy poverty, for many household types energy poverty continues even at high BER levels<sup>19</sup>. Increased energy efficiency alone is not enough to address households' vulnerability to increased energy prices. Measures such as microgeneration may provide fuller solutions to energy poverty for many households.

We suggest solar panels are included as a measure in any retrofit schemes adopted under the Plan, as well as in the existing Warmer Homes Scheme. This would align with EU recommendations on energy poverty<sup>20</sup>. Existing models suggest that where solar panels are installed in social housing, tenants may see an immediate lowering of energy bills<sup>21</sup>.

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<sup>16</sup> National Traveller Monetary Advice and Budgeting Service (MABS) (2022). Research on the Energy Efficiency of Mobile Homes for Irish Traveller Communities

<https://www.ntmabs.org/images/resources/publications/policy/mobile-homes-energy-efficiency-report-2022.pdf>

<sup>17</sup> O'Keeffe et al. (2025). Building trust and warmth: Co-designing energy solutions with Travellers and displaced communities in Ireland. *Societal Impacts*, vol. 6, December 2025.

<https://doi.org/10.1016/j.socimp.2025.100149>

<sup>18</sup> MABS, *ibid*.

<sup>19</sup> O'Carroll, N. (2023). The Cost of Adequately Heating the Home: Examining the Variation in Minimum Household Energy Needs by Level of Dwelling Efficiency and Exploring an Alternative Approach to Supporting Households at Risk of Energy Poverty. Vincentian MESL Research Centre.

[https://www.budgeting.ie/download/pdf/the\\_cost\\_of\\_adequately\\_heating\\_the\\_home.pdf](https://www.budgeting.ie/download/pdf/the_cost_of_adequately_heating_the_home.pdf)

<sup>20</sup> European Commission (2023). Commission Recommendation on Energy Poverty (EU) 2023/2407 Section VI 18. [https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L\\_202302407](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202302407)

<sup>21</sup> Van Elst, S. & Michielssens, M. (2023). How to fight energy poverty while meeting climate goals: free solar for social housing. World Economic Forum. <https://www.weforum.org/stories/2023/08/fight-energy-poverty-climate-goals-free-solar-panels-social-housing-a6e2532544/>

Research into the use of solar panels in council housing in England suggests that any programme including solar panels must incorporate knowledge-building for users<sup>22</sup>.

## **5. Incorporation of Lived Experience**

Throughout this submission, we have stressed the need to understand energy poverty and vulnerability as an experience and outcome, not as a straight-forward issue of energy efficiency or low income. Customers may self-ration energy and therefore fall outside of traditional 10% measures of energy poverty, yet still be vulnerable to increased energy prices and unable to afford to adequately heat the home. We have recommended targeting specific groups such as lone parent households, people with disabilities, older people, and marginalised groups such as Travellers. Addressing these points within the Social Climate Plan will require attention to energy poverty as a lived experience. Research must be undertaken to understand how these groups use energy, the barriers they face adopting new technologies, and the impact of retrofits & new technologies on their energy use.

In addition to the household types and groups mentioned above, examples of areas in need of greater engagement with Lived Experience are:

- How households in energy poverty adapt to heat pumps.
- Households in energy poverty using group/district heating.
- Barriers pre-pay customers face in accessing retrofit schemes and other supports.

## **6. Integration across existing supports**

Under the EU Social Climate Fund, Ireland can receive a maximum of €663 million. The Fund is an opportunity for Ireland to address the growing gap between affluent households and households in energy poverty which widening as a result of the energy transition. Though significant, the funds available are not sufficient to fully address energy poverty in Ireland.

We encourage the Department to ensure that any programs funded by the SCF are well-integrated across existing programmes, including through providing the resourcing necessary to continue and expand existing initiatives as needed to ensure alignment. While direct income supports are limited and given time restrictions under the Fund, the Department should continue to increase and expand eligibility for direct income supports such as the Fuel Allowance to groups at greatest risk of energy poverty.

Finally, we stress that programmes and initiatives funded through the SCF should not be siloed off or isolated from the wider system of supports in Ireland. This would risk inefficient barriers and cliff-edges in implementation. Rather, the Plan should explicitly link new supports with existing supports.

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<sup>22</sup> Fox, N. (2023). Are solar panels worth it for lower-income households? University of Brighton.  
<https://www.brighton.ac.uk/news/2023/are-solar-panels-worth-it-for-lower-income-households>